

National Trust for Scotland Objection to MachairWind Offshore Windfarm

12th August 2026

1. Introduction

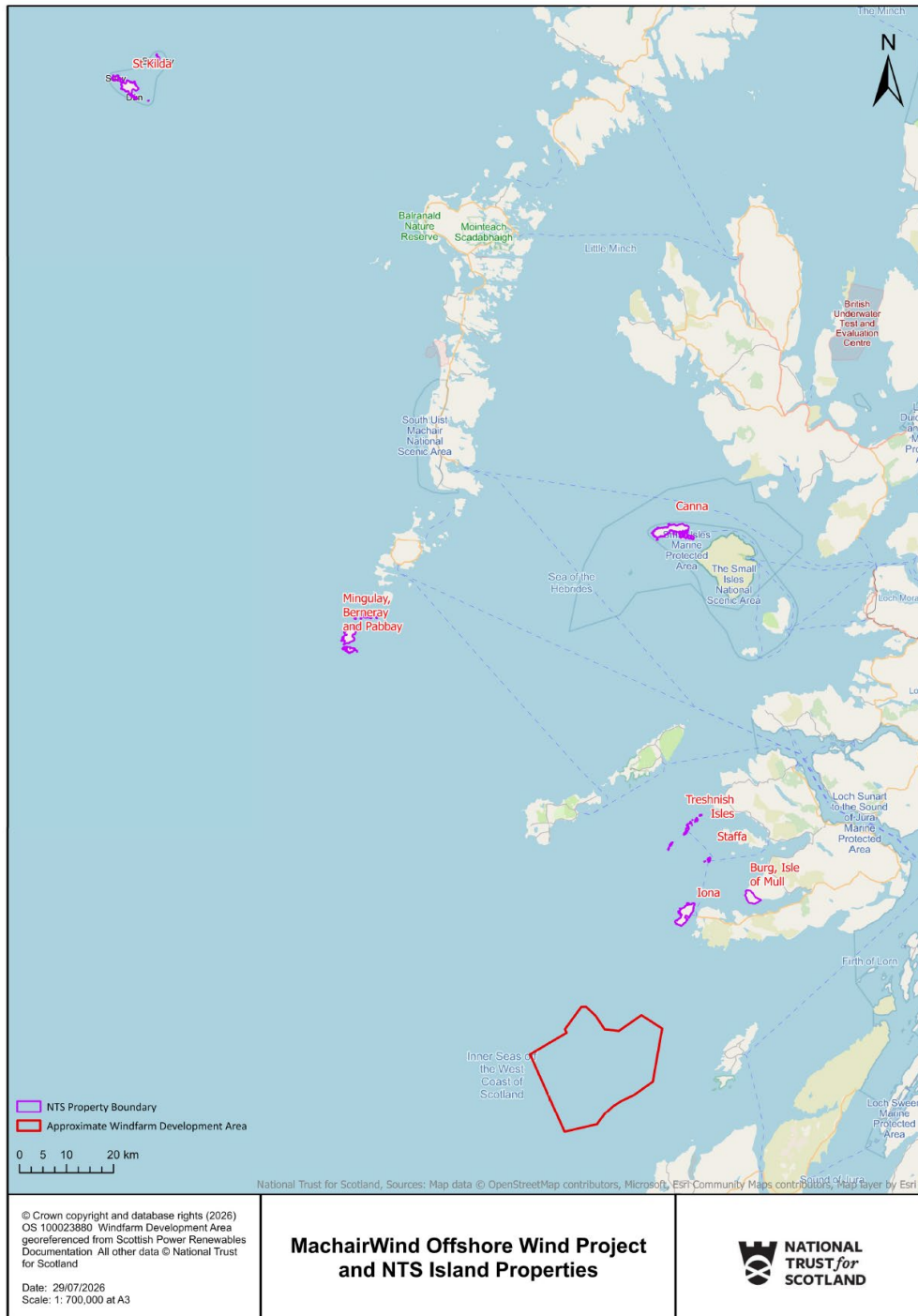
The National Trust for Scotland (the Trust) supports the transition from fossil fuels to renewable energy, which is needed to both address climate change and to help restore nature. However, renewable energy schemes must be at the right scale and in the right location to minimise negative impacts on communities, heritage and nature.

The Trust does not agree that the MachairWind Offshore Windfarm is in the right location due to the scale and magnitude of impact it will have on island communities, landscape, marine mammals and cultural heritage. We are also concerned about the impacts it may have on seabird colonies. The Trust owns Canna and Sanday, Iona, Burg on Mull, Staffa, the Treshnish Isles and St Kilda World Heritage Site. The impacts of the development will be acutely felt in relation to Iona, Staffa and the Treshnish Isles. It may also have impacts on other Trust owned islands that are home to seabird colonies.

For these reasons, the Trust **objects to the proposed development.**

2. Geography of site

The MachairWind Offshore Windfarm is a 2GW development NW of Islay; SSW of Iona, the Treshnish Isles and Staffa; and W of Colonsay. The Trust owns Iona, Burg, the Treshnish Isles and Staffa. Iona is home to around 170 permanent residents, and post Covid has had a steadily developing visitor base, with 110,000 people visiting in 2024.



3. The Trust's position on offshore renewables

The development of offshore wind is vital to increasing Scotland's renewable energy generation capacity to meet the Scottish Government's targets of net zero by 2045. The Trust welcomes the ambition behind the expansion of offshore wind, but this must not come at the expense of nature, heritage and Scotland's communities. We support offshore wind, *at the right scale and in the right location*. By choosing more appropriate locations, negative impacts on communities, cultural heritage, local economies, marine life, and bird life will be minimised.

4. The Trust's objection

The Trust supports offshore windfarms at the right scale in the right location. We do not believe the MachairWind Offshore Windfarm meets this criterion due to the negative impact it will have on the tourist economy, habitability, landscape, marine environment and cultural heritage of Iona, Staffa and the Treshnish Isles, all of which are all Trust owned sites.

We are also concerned about the ornithological impact of MachairWind and the accuracy of the baseline data. The Trust requests more time to examine Chapter 11 and would flag ornithological impacts as an area which should be closely examined by NatureScot in the assessment of this application.

Finally, the Trust disputes the accuracy of the conclusions about the socio-economic impact of the development as they are based on the conclusions of Chapter 16, which vastly underestimates the landscape impact.

For these reasons, the Trust **objects to the proposed development**.

a. Landscape and seascape

The Trust objects to the development due to the landscape and seascape impacts identified in Chapter 16 of the EIAR. We are objecting to the development because of the known impact, as well as because the impact has not been fully explored by the applicant- key viewpoints from all three Trust properties are missing from the application meaning we do not have a comprehensive understanding of the landscape impacts, at this point in time.

It is important to understand that landscape cannot be considered in isolation. The impacts on landscape have a direct knock-on effect on the socio-economic health of surrounding islands, and the seascape is an intrinsic part of the islands' history, cultural heritage and how it is understood and enjoyed. The islands around the array area are special precisely because of the landscape in which they are situated and the seascape they look out on.

Below we outline our concerns in relation to each individual Trust property:

i. Iona

The Trust's Property Statement for Iona reads:

"The island is... recognised for its scenery, the clarity of the air, its sense of space and tranquillity, each adding to the very special atmosphere of the place and providing inspiration to those who live there and visit. It is the mix of these values and the continuing spirit of community that sets Iona apart..."

A less tangible, but no less important, aspect of the island's landscape and scenic value is the remarkable clarity of the light that seems to bathe the island, enhancing the intensity of the colours and scenery. W H Murray said of it "what Iona does have is a purity of light and colour that seems to excel that of other islands" (National Trust for Scotland, Iona Property Statement, 2014).

The Property Statement sets out the huge importance landscape and seascape have on Iona. They are of the highest value as they create Iona's special qualities as a place of spirituality, remoteness and tranquillity. The feelings these perceptual qualities evoke attracts visitors and contributes to its unique cultural heritage.

Given the significance of landscape and seascape to Iona, we do not believe the visual assessment in Chapter 16 has been adequate for the island. We believe more viewpoints must be considered before any judgement can be made on the application. Key viewpoints that must be fully assessed are:

- St Columba's Bay and Carn Cul ri Eirinn, which both embody strong connections to Ireland and Iona's unique heritage as the birthplace of Scottish Christianity.
- The view from St Mary's Chapel towards Ireland, as highlighted by historic Environment Scotland as an important view in Chapter 15.
- The Marble Quarry, a scheduled monument that would look directly at the array.

In addition to a need for further viewpoints to be assessed before a judgement is made on the application, the Trust objects to the application based on the conclusions that have been drawn about the viewpoints that were included in the EIAR.

The Trust disagrees strongly with the applicant's assessment that the landscape impact on Iona (viewpoint 22 Dun I) will be of medium magnitude of impact and that the effect significance of the windfarm when operational would be "moderate and significant".

Chapter 16 uses an element of professional judgement to arrive at the conclusions about viewpoint 22. The magnitude of impact has been judged as medium due to distance from the array, the maximum horizontal angle of the view, and the fact the development is in open sea. This gives disproportionate weight to the distance between the turbines and Iona and not enough weight to the impact the turbines will have on the character of seascape, relationship between islands and open sea, importance of the horizon, the distinctive characteristics of the area, and perceptual qualities like openness and remoteness.

NatureScot guidance highlights that the above factors should be included when assessing impact, and the distance between the turbines and viewpoints should not be the standalone consideration (*Scottish Natural Heritage, offshore renewables- guidance on assessing the impact on coastal landscape and seascape, 2012*). Similarly, GVLIA3 states magnitude should not be determined by distance alone but also “the size and scale of change, its geographical extent, and duration and reversibility” (p38, *Landscape Institute, Guidance for landscape and Visual Impact Assessment v3, 2013*).

In essence, how the character of a place will be changed matters as much as how visible the turbines will be.

The assessment of viewpoint 22 from Dun I clearly shows the negative impact the array will have on the character of Iona. The view from Dun I is a defining panoramic of the Sea of the Hebrides and out to the Atlantic. It is a key contributor to Iona’s scenic character. When built, the windfarm will become a focal point in the view and create a break in the seascape. This will have a huge impact on people’s experience of the island, particularly because visitors naturally look west to the horizon and the setting sun. In Iona the westward view towards Ireland also has important cultural significance and is a key part of the pilgrimage trail, as Iona is where Columba landed after travelling from Ireland.

In addition to not agreeing with the weighting given to how the character of the landscape will be impacted, the Trust also believes that viewpoint 22 (Dun I, Iona) should have been assessed to be of high magnitude of impact and major and significant effect significance in line with the conclusions drawn about viewpoint 14 (B8086 south of Lower Kilchattan, Colonsay) and viewpoint 13 (Oronsay Priory, Colonsay)

The different conclusions the applicant has arrived at for the viewpoints on Colonsay and the viewpoint on Iona seem to be based on the distance of the development from the landmass and the maximum horizon angle. The developer states the turbines will be a defining characteristic of the seascape as viewed from Colonsay because the distance is shorter (12km) and there is a greater maximum horizon angle (which will make the turbines appear taller). In contrast, Iona is 20km away with a lesser maximum horizon angle, and this seems to have led to the conclusion that because the turbines will appear smaller, they will not be a defining characteristic of the seascape.

The Trust does not agree the distance from the turbines from Colonsay and from Iona merit differing conclusions of magnitude and effect significance. Although the turbines will appear smaller when viewed from Iona compared to Colonsay, the character of the view from both islands is similar and the impact on character matters as much as the size of the turbines. For both Colonsay and Iona the windfarm will:

- Create a continuous line of turbines across the Atlantic horizon
- Interrupt the westward view of sunset
- Create a substantial industrial feature in undisturbed landscape

The Trust believes that by focussing on distance, the applicant has vastly underestimated the impact of the MachairWind Offshore Windfarm on the character of the seascape, relationship between Iona and the sea, and the perceptual qualities of openness, remoteness and wildness.

We disagree with the decision to focus on distance and not on character, and the conclusion of medium magnitude of impact and moderate and significant effect significance this has led to.

i. Staffa and the Treshnish Isles

Staffa and the Treshnish Isles are in the Loch na Keal National Scenic Area (NSA). The special qualities of the NSA include:

- *“Highly distinctive seaways and shores*
- *A voyage from enclosed sea loch to the open Atlantic*
- *Views of an island-studded sea*
- *A vast natural world, dwarfing human settlement”*

Expanding on the special quality of ‘a vast natural world, dwarfing human settlement’, Scottish Natural Heritage (SNH) state *“Within this vast, natural landscape, ranging from the heights of Ben More to the distant Treshnish Islands, settlement is sparse... the eye is swept down from the hills, along the coastline of Loch na Keal and out to sea. This increases the drama and accentuates the feeling nature is dominant, impervious to humans and their actions.”* (Scottish Natural Heritage, the special qualities of the National Scenic Areas. SNH Commissioned Report No.374., 2010).

The Trust believes these special qualities as described by SNH (now NatureScot) would be compromised by the MachairWind Offshore Windfarm as the array will be visible from the Treshnish Isles and Staffa over the Ross of Mull. We disagree with the conclusion in Chapter 16 that the magnitude of impact on Staffa would be low and the effect significance would be minor and not significant.

This conclusion appears to have been reached partly because of the greater weighting given to distance, which has led to an underappreciation of the impact on character. On pg 70 of Chapter 16, with reference to the impact on the *Landscape Character Type 45 Stepped Cliffs and terraces – Argyll* the applicant writes:

“Viewpoint 21 – Staffa (Figure 16.2.21 of Appendix 16.4 SLVIA Visualisations) is representative of these views. In these views the Project would be seen in the distant seascape. Intervening landform in the far south-west of Mull would partially break up views of the Project. Islands and views of the sea contribute to the character of this LCT. Views of a distant offshore windfarm would influence these characteristics. However, and given the viewing distance (generally beyond 30 km distant) the scale of change is judged to be small”

As with the case of Iona, the Trust fundamentally disagrees that distance should be given greater weighting than character. The character of the view from Staffa will be massively altered which will compromise the qualities of the NSA.

The applicant has not produced photomontages for viewpoints from Staffa and the Treshnish Isles (although has included a viewpoint from Staffa). There are also no viewpoints considered from the Treshnish Isles. There is a wire diagram showing the view from Fingal's Cave, which shows the turbines will appear taller than the Abbey and Dun I, which is the highest point in Iona. The Trust strongly feels that to fully assess the application photomontages need to be produced for key viewpoints on Staffa and the Treshnish Isles, and a viewpoint needs to be produced from the Treshnish Isles. These should include:

- View from the top of the island above Fingal's Cave, Staffa
- View from the top of the island of Lunga in the Treshnish Isles

b. Socio-Economic impacts

Iona's economy is highly dependent on tourism to the island, which is closely tied with its cultural heritage and landscape value. The island's atmosphere, spirituality, sense of serenity and tranquillity, its natural heritage, scenery, light, colours, land and seascapes and views are key to its tourism industry. Likewise the economies of Mull and Iona are dependent on the Treshnish Isles and Staffa as important ecological, geological and cultural attractions. Iona attracts between 20-30k visitors per year, and almost 100k people visit Staffa per year (*National Trust for Scotland, 2026*).

Chapter 18 assumes tourism is not affected because Chapter 16 concluded the impact on Iona's visual amenity would be of medium magnitude of impact and moderate and significant effect significance. The Trust echoes the Iona Community Council's concerns about this 'downward bias of evidence', whereby because the conclusions in Chapter 16 were underestimated, Chapter 18 has drawn inaccurate conclusions about the impacts on tourism on Iona.

The Trust also disagrees with the logic in Chapter 16 that because the islands near the array area have many individual features that attract tourists (visual, wildlife, cultural, history etc), degradation of one of the features alone will not be of detriment to the visitor economy. The landscapes and seascapes of Iona, Staffa and the Treshnish Isles are an integral part of the tourism offering and intrinsically tied up in the cultural and spiritual offering of the islands. Degrading the visual amenity will degrade the other aspects of the tourism offering. This means that it cannot be assessed as an 'individual feature'.

We also disagree that the feeling of remoteness that is attractive to so many would remain, and although only west coast beaches would be affected, the westward view is the one that most draws the eye and is of most importance to the island.

As stated in the Trust's Property Statement for Iona: "*visitors are an ever-present reminder of the island's historical legacy and its popularity, and the great numbers that come provide a valuable and essential element in the island's economy, with many jobs reliant on tourism... Visitors have been a feature of the Iona landscape for centuries... inspired by the multitude of images and*

descriptions of the island's scenery and atmosphere, its beautiful white beaches and the spectacular seascapes, its remarkable light and the peace and serenity that seems to envelop the island." (National Trust for Scotland, Property Statement for Iona, 2014).

The Trust is deeply concerned that how reliant and intertwined tourism on Iona, Staffa and the Treshnish Isles is with the landscape, that the MachairWind Offshore Windfarm would impact visitor numbers creating a negative knock on effect on the local economy.

c. Habitability

There has been a community on Iona for at least 3500 years. BiGGAR economics, on behalf of the applicant, identified there could be a potentially significant effect pathway on habitability of island communities, yet no dedicated habitability assessment was undertaken for Iona. The lack of assessment meant the applicant concluded there are no significant effects on the long-term habitability of the island. The Trust agrees with the Iona Community Council that a habitability assessment for Iona is critical and until this has been done no judgement should be made on the application.

d. Cultural heritage impacts

The landscape and seascape are intertwined with the cultural heritage of Iona. The island's history and culture is understood and experienced through the series of monastic sites, the interplay between sea and land, and the westward view which draws the eye. The island is also spirituality important. Iona was where modern Christianity spread from in Scotland and has a strong sense of place and living heritage, with pilgrimages still part of island life for visitors and residents.

Historic Environment Scotland (HES) advice for this application was that Iona's cultural importance is derived from the relationships and interplay of individual monuments and places rather than their individual merit. The interplay between sea and land was particularly emphasised. HES emphasised concerns about: the development reducing the sense of isolation associated with the monastery; the views towards Ireland being negatively affected; and the experience of how visitors experience the pilgrimage landscape being undermined.

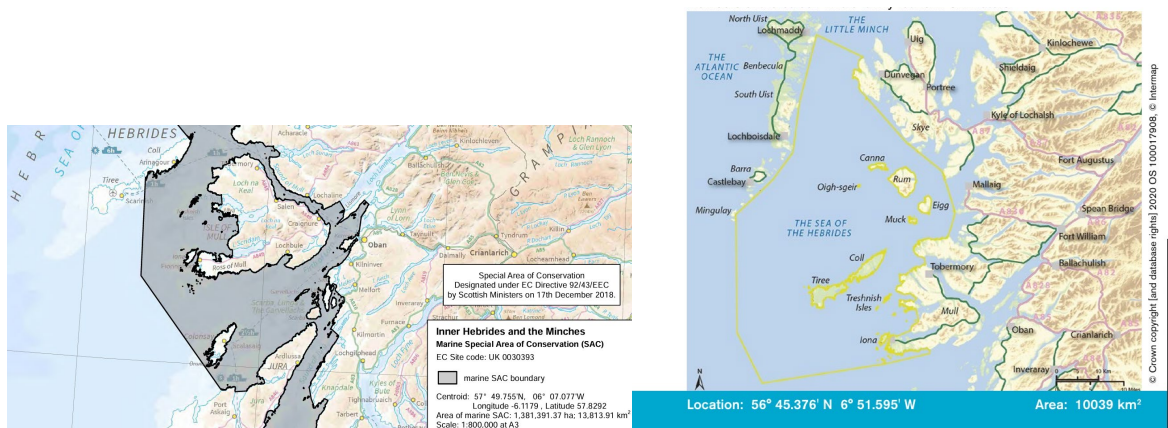
Although the applicant acknowledged there would be significant adverse effects on the setting of the built heritage, it concluded that *"core cultural significance, understanding, appreciation and experience of Iona would be retained, the Abbey would remain the dominant feature, and the integrity of the monastic landscape would not be lost"*. The Trust is concerned that the turbines would in fact detract from the Abbey as the focal point. This would reduce the sense of isolation associated with the monastery, negatively impact the westward view, and undermine the pilgrimage landscape which will severely harm the cultural heritage of the island.

In their objection, Iona Community Council raised issue with the treatment of Iona through static viewpoints, rather than understanding it through how people move through the landscape. In Chapter 14 (on Offshore Archaeology and Cultural Heritage) the approach to Iona from Mull is assessed as a series of disconnected and static views. In line with this, the applicant uses a single photomontage of the sea to represent the view from the ferry and argues

therefore the effect on the view of the Abbey is limited. However in reality, passengers will scan the horizon and see both the sea, the array area, and the Abbey as one cohesive view. The Trust believes the application needs to assess the monuments, views and landscape of Iona as an interconnected experience critical to its cultural heritage, rather than assessing them in isolation.

e. Marine mammals

The proposed development is on the boundary or close to the Inner Hebrides and the Minches Special Area of Conservation (SAC), designated for harbour porpoises, and the Sea of Hebrides Nature Conservation Marine Protected Area (NCMPA), designated for Minke Whale and Basking Shark. Both of these protected areas include the waters on the west coast of Mull and the waters directly around Iona, the Treshnish Isles and Staffa. The development is also close to the Loch Sunart to the Sound of Jura Marine Protected Area which has been designated for the protection of flapper skate and borders the east of Mull and the Treshnish Isles SAC which is designated for grey seal.



Maps of Inner Hebrides and the Minches SAC and Sea of the Hebrides NCMPA, showing Trust owned sites within and adjacent to the protected areas (NatureScot, 2026)

Chapter 10 of the EIAR concludes no significant effects on the protected sites, however we believe in addition to assessing this through a conservation lens they need to be assessed through a tourism lens.

The Seas of the Hebrides NCMPA is one of the most important minke whale observation sites. Iona, Staffa, Mull and the Treshnish Isles are widely recognised wildlife watching spots with whale and dolphin based tourism businesses operating out of Iona and Mull. We are concerned about the impact the windfarm will have on these businesses and on the islands' reputations for marine wildlife watching. Chapter 10 does acknowledge that construction noise may cause minke whales and grey seals in the NCMPA and SAC to temporarily exhibit disturbance behaviours and avoid haul out sites. Although the application concludes this will not have a population level impact due to the temporary nature of displacement during construction, even

a temporary impact on marine mammals could have a longer term detrimental reputational impact on tourism in the region.

5. Ornithological concerns

In addition to our objection, we would like to bring attention to our concerns about the ornithological assessment in the EIAR. The Trust has concerns about the baseline data used for some Special Protected Areas (SPAs). Accurate baseline data is of critical importance to ensure prediction models are accurate.

The application concludes the development will not affect the integrity of the affected SPAs. The Trust is surprised at this assessment given the scale of MachairWind and number of species within the affected SPAs.

We would like to bring attention to these concerns and encourage close assessment by NatureScot and the Marine Directorate Licensing and Operations Team of the EIAR's ornithological models and conclusions. Additionally, third sector organisations would benefit from additional time to understand and assess the EIAR further, as the length and technicality of it means substantial time and resource are required.

6. Concluding remarks

Climate change has a huge, negative impact on everything discussed above- it reduces the survival chances for our seabirds, makes it difficult for marine mammals to thrive, contributes to erosion of our islands and the heritage they hold, and negatively impacts communities' habitability, economic prosperity and safety. As a country we must tackle climate change and offshore wind is a critical part of how we do this.

However, offshore wind must not be delivered at the expense of our island communities, nature, or cultural heritage. Offshore wind must be placed in the right places and at the right scale where damage is most reduced. The Trust feels this is likely to be in locations further out to sea as the landscape, marine environment, seabird, and heritage impacts are likely to be vastly reduced the further turbines are from land.

The Trust objects to the MachairWind Offshore Windfarm. We do not agree that the EIAR is comprehensive; uses appropriate judgement about the impact on landscape character; and draws accurate conclusions, particularly with regard to socio economic impact, landscape impacts, and cultural heritage impacts.

We welcome dialogue with the applicant and Marine Directorate on these points.

With regards,

Clea Warner



Regional Director, Highlands and Islands

National Trust for Scotland