

OBJECTION DETAILING HOW THE SCOTTISHPOWER RENEWABLES' EIA FAILS TO ASSESS RISK TO THE ROSS OF MULL & IONA
SUBMITTED BY A ROSS OF MULL COMMUNITY MEMBER

I wish to formally object to the proposed MachairWind Offshore Wind Farm.

I want to begin by making clear that I am not opposed to renewable energy or offshore wind in principle. I recognise the need for Scotland to generate more renewable electricity.

My objection is to this development, at this scale and in this location, and to what I consider to be fundamental weaknesses in the way some of its impacts on the Ross of Mull and Iona have been assessed.

Having spent considerable time reading the Environmental Impact Assessment, particularly Chapters 16 and 18, and corresponding with the developer through Mull Community Council, I have become increasingly concerned that the assessment does not adequately capture what is actually at risk.

At the centre of my concern is a relatively simple issue:

The environmental effects are concentrated on the Ross of Mull and Iona, yet the socio-economic assessment repeatedly broadens the assessment to the whole of Mull.

That matters enormously.

1. The Ross of Mull is the affected area – not the whole Isle of Mull

Chapter 18 itself states that:

“Significant landscape and visual effects have been identified on receptors in southwest Mull at distances of 21–24 km.”

It acknowledges that these effects may affect beaches and outdoor spaces in southwest Mull. However, it then reasons that other parts of the island, including the east, north and “areas with a greater level of tourism infrastructure, such as Tobermory” will not be affected. Because the “majority of features” remain unaffected, the tourism impact is assessed as low.

I consider this a serious weakness in the methodology.

The affected community is the Ross of Mull. Yet the impact upon that area is effectively diluted by including parts of Mull which will experience little or none of the identified effect.

Tobermory is not the Ross of Mull. Duart Castle is not the Ross of Mull.

The fact that a visitor can continue to visit an unaffected attraction elsewhere on a large island does not reduce the alteration being experienced by the community and visitor economy in the southwest.

If an environmental impact is geographically concentrated, surely the socio-economic assessment should examine the economy and community of the **area experiencing that impact**.

I therefore ask the Marine Directorate to consider whether “Mull” is an appropriate geographical receptor for the tourism assessment at all, when Chapter 18 itself identifies the significant visual effects specifically in southwest Mull.

This is particularly important because the Ross of Mull is not simply an arbitrary geographical corner of a larger tourism destination. It is a destination in its own right and the gateway to Iona and Staffa.

Fionnphort, Erraid, the Sound of Iona, the Iona ferry crossing, west-facing beaches, coastal walks and the journeys to Iona and Staffa are fundamental parts of the visitor experience.

Indeed, Chapter 16 selects **Erraid, the Mull-Iona ferry and Dun I on Iona as specific assessment viewpoints**.

I therefore question whether unaffected attractions elsewhere on Mull should have any material role in reducing the assessed magnitude of a tourism impact concentrated on the Ross of Mull.

2. The assessment confuses the continued existence of an attraction with the continued quality of the experience

There is a further problem with the reasoning in Chapter 18.

It identifies individual tourism features—wildlife, heritage, beaches, Tobermory and so on—and asks which of them will continue to exist.

But that is not necessarily how visitors experience a place.

A white-tailed eagle does not cease to exist because turbines appear behind it.

Staffa does not disappear.

Iona Abbey remains standing.

A beach remains a beach.

But that does not mean the **experience of visiting those places remains unchanged**.

Someone travelling across the Sound of Iona is not simply consuming a ferry service. Someone watching wildlife is not simply consuming a wildlife species. Someone sitting on an Atlantic-facing beach is not simply consuming sand.

They are experiencing the landscape, seascape, weather, wildlife, history, tranquillity and remoteness together.

The EIA itself describes the view from the Mull-Iona ferry as having **uninterrupted views across the Sound of Iona**, with longer-distance views looking **“out across the Atlantic”** towards the development.

That is exactly what I fear the socio-economic methodology fails to capture.

3. Sense of place cannot adequately be reduced to a matrix

There is something deeply human about looking towards an open horizon.

For generations, the landscapes and seascapes of the Highlands and Islands have been written about, painted, photographed and sung about. That is not accidental.

An open seascape invites the eye to travel.

People stand on these shores and look for Staffa, Tiree, Coll, Colonsay or distant hills. They watch boats appear and disappear over the horizon. They watch weather coming in from the Atlantic. They look for whales, dolphins and seabirds. They watch sunsets. At night, the same horizon disappears into darkness and the sky takes over.

Part of the experience is precisely **what is not there**.

That absence of development has value.

The open horizon, darkness, remoteness and uncertainty about what might appear in the distance form part of the sense of place.

The proposed turbines are not simply isolated “objects at a distance”. Up to 144 turbines would create a large industrial array occupying sections of that horizon.

Chapter 16 itself describes the 144-turbine layout from various viewpoints as turbines spread across the skyline and recognises significant effects from locations including Erraid and Dun I. At Dun I, for example, the assessment concludes that the operational visual effect would be **moderate and significant**.

I therefore find it difficult to reconcile the acknowledgement of significant landscape and visual change with the conclusion in Chapter 18 that the consequences for tourism are minor simply because other tourism features remain available.

4. John Urry and the “Tourist Gaze”

There is an established body of tourism scholarship which helps explain why this distinction matters.

John Urry's concept of the “**tourist gaze**” recognises that tourists seek places and visual experiences which are different from those encountered in ordinary everyday life.

This seems particularly relevant to the Highlands and Islands.

Visitors do not travel to Mull and Iona simply to tick individual attractions off a list.

They come partly because the place feels different.

The journey matters. The landscape between destinations matters. The absence of urbanisation matters. The views matter. Remoteness matters.

In that context, the landscape is not merely the setting in which the tourism economy operates.

The landscape is part of the tourism product.

That distinction should be central to an assessment of a development whose primary local effect is landscape and visual change.

5. Engagement is not evidence

SPR has responded to questions raised through Mull Community Council by emphasising its extensive engagement with local communities and organisations.

I acknowledge that engagement.

The developer has held drop-in sessions, attended community council meetings and events and engaged with organisations including MCC, Iona Community Council, SWMID and MICT.

But **community engagement and primary evidence are not interchangeable**.

Holding an exhibition tells people about a development and allows them to express views.

It does not in itself establish:

- why people visit the Ross of Mull;
- how they value its landscape;
- how important uninterrupted seascapes are to visitor experience;
- the economic importance of the affected areas;
- how local tourism businesses depend upon those characteristics;
- whether visitors would change where they stay, how long they stay or whether they return;
- or how residents value the landscape in which they live.

SPR's response states that the local baseline was developed using ferry passenger numbers and tourism features, after which empirical evidence from **other UK coastal areas with existing offshore wind farms** was applied to that baseline.

That is not the same as gathering empirical evidence from the receiving community.

6. The comparator evidence needs much greater scrutiny

Chapter 18 relies heavily on evidence from other offshore wind developments to support its conclusion that MachairWind is unlikely to have a significant effect on tourism.

For example, the assessment refers to research examining tourism and visitor responses around existing offshore wind farms and concludes that there is generally no evidence of adverse effects on tourism employment or visitor behaviour.

I accept that evidence from operational wind farms is relevant. However, before applying those findings to the Ross of Mull and Iona, there needs to be much greater scrutiny of whether the developments being relied upon are genuinely comparable.

The research cited includes visitor studies associated with offshore wind farms around **Aberdeen, Brighton, Great Yarmouth and North Wales**. Many of these developments involve turbines dramatically smaller than those proposed for MachairWind.

For example, Rampion's turbines are approximately **140 metres to blade tip and 3.45 MW**, while Scroby Sands uses **2 MW turbines**. By contrast, MachairWind's design envelope allows for **up to 144 turbines approximately 280 metres to blade tip**, or a smaller number of turbines reaching approximately **335 metres**.

Distance from shore also varies considerably between comparator projects. This is important because neither turbine height nor distance can sensibly be considered in isolation.

A 100–140 metre turbine viewed from one distance cannot simply be assumed to provide evidence about people's response to a 280–335 metre turbine at another distance.

Nor is the height of an individual turbine the only consideration. The visual experience of an offshore wind farm is affected by:

- turbine height and rotor diameter;
- number and density of turbines;
- distance from the receptor;
- horizontal extent of the array across the horizon;
- atmospheric conditions;
- aviation and navigation lighting;
- and, critically, the character of the landscape from which it is being viewed.

Chapter 16 itself recognises that the 144-turbine scenario creates greater turbine density across the horizon, even where individual turbines may appear somewhat smaller than under the alternative layout.

This distinction is particularly important in the Ross of Mull and Iona because the receiving environment is an open Atlantic seascape characterised by comparatively little development.

There is also a fundamental difference between asking whether an offshore wind farm affected tourism in Aberdeen, Brighton or Great Yarmouth and asking whether an industrial development of this scale could influence visitor experience in the Ross of Mull and Iona.

The relevant question is therefore not simply:

"Have previous offshore wind farms caused measurable reductions in tourism?"

It is:

"Is there reliable evidence from developments sufficiently comparable in turbine scale, array scale, distance, lighting, landscape character and tourism dependency to allow their outcomes to be transferred to the Ross of Mull and Iona?"

I do not believe Chapter 18 adequately demonstrates that comparability.

I therefore ask the Marine Directorate to require the applicant to demonstrate the relevance of the comparator developments relied upon, including their **turbine height, rotor diameter, number of turbines, horizontal extent, distance from relevant receptors, aviation-lighting regime and the characteristics of the receiving tourism economy**.

Without that comparison, there is a danger of treating all offshore wind farms as equivalent when they plainly are not.

7. Aviation lighting and the loss of darkness

My greatest individual concern is aviation lighting.

Chapter 16 explicitly acknowledges that aviation and marine lighting can cause potentially significant effects where there are few existing artificial lights and where **“darkness or dark skies are an integral and valued aspect”** of the landscape or seascape.

That description could scarcely be more relevant to the Ross of Mull and Iona.

At Erraid, the EIA states that red flashing aviation lights and yellow flashing marine navigation lights would be visible approximately 21 km away in an **“otherwise dark seascape.”**

Under the 2,000 candela scenario, the EIA itself assesses the night-time effect at Erraid as **moderate and significant**. It only falls to minor/not significant under the assumed 200 candela scenario.

At Dun I on Iona, the same distinction occurs: the 2,000 candela scenario produces a **moderate and significant** night-time effect, whereas the assumed 200 candela scenario is assessed as minor.

That difference is extremely important.

The conclusion therefore depends heavily upon the eventual lighting specification and operating regime.

Yet the final detailed Lighting and Marking Plan has not been agreed.

I do not believe a visualisation based upon an assumed lighting arrangement can provide sufficient certainty about the final effect if the lighting scheme that will actually be constructed remains subject to later agreement.

This should not be treated as a minor technical detail to be resolved after consent.

Darkness is part of the existing environmental baseline.

Once regular flashing aviation lights are introduced across an Atlantic horizon, that baseline has fundamentally changed.

8. Construction is not simply “temporary” to the people living through it

I am also concerned about the treatment of construction effects.

Chapter 16 describes construction effects as short-term and reversible, involving marine traffic, construction activity and the progressive appearance of partly constructed turbines and platforms.

In EIA terminology, that may be described as temporary.

For a resident or tourism business, however, several years is not insignificant.

It is several tourist seasons.

It is several summers.

It is a period of children's lives and people's working lives.

The Marine Directorate should consider construction effects from the perspective of the communities actually living through them, including vessel activity, construction lighting, changing views, disturbance and the cumulative experience as an industrial development of this scale gradually occupies the horizon.

9. The economic value of the landscape must form part of the balance

I also believe there is a danger in presenting renewable-energy development as an economic benefit while treating the landscape affected by that development primarily as an aesthetic or environmental consideration.

The landscape of Scotland is itself an economic asset.

Tourism is one of Scotland's major industries. VisitScotland reports that the visitor economy generates approximately **£10.8 billion in visitor spending and supports around 245,000 jobs**. The Highlands alone recorded approximately **1.79 million overnight tourism visits in 2024, generating around £756 million in visitor spending**.

Perhaps even more relevant to this assessment is *why* people choose Scotland.

VisitScotland's Scotland Visitor Survey found that approximately **70% of visitors cited scenery and landscape as a reason for choosing Scotland**.

That is important evidence.

The landscapes and seascapes of the Highlands and Islands are therefore not simply beautiful places which must occasionally be sacrificed in pursuit of economic development. **They are productive national economic assets in their own right.**

That should fundamentally affect the way the competing benefits are considered.

Chapter 18 also identifies where many of the direct economic benefits associated with the project are expected to occur. Major beneficial effects are associated with marshalling, assembly, operations and maintenance locations including Hunterston, Oban, Kishorn, Campbeltown and Machrihanish, as well as wider Scottish supply-chain benefits.

The geographical distribution is therefore important.

The **Ross of Mull and Iona experience significant landscape and visual effects**, while substantial employment and investment benefits identified by the EIA are expected elsewhere.

At present, there is also no clearly defined long-term community benefit package for the Ross of Mull and Iona proportionate to the scale and duration of the impacts being accepted.

Nor does generating approximately 2 GW of renewable electricity mean that households in the Ross of Mull will receive cheaper electricity.

That distinction matters to me.

I believe most people understand that achieving net zero will require compromises. I also believe many communities would be prepared to accept some loss or change to landscapes they value if they could see a clear and compelling wider public benefit — particularly if that transition delivered things such as greater energy security, lower household energy costs and tangible benefits for the communities bearing the environmental impacts.

But that social bargain cannot simply be assumed.

This is a commercial energy development. The electricity enters the national transmission system, while the economic benefits and environmental impacts are distributed very differently geographically.

The Marine Directorate should therefore consider not only the **gross economic benefit generated by the project**, but the distribution of that benefit alongside the distribution of its environmental and socio-economic costs.

The question is not whether renewable energy has economic value. Clearly it does.

The question is whether sufficient weight has also been given to the economic value of the landscape being changed and to the communities whose relationship with that landscape will be altered for decades.

For these reasons, I object to the MachairWind Offshore Wind Farm in its current form and ask that these matters are given substantive consideration before any consent is granted.