



Objection to the proposed MachairWind Offshore Wind Farm, Section 36 application reference 00012385 and marine licence application reference 00012386, associated case reference ECU00004704, submitted by MachairWind Limited (ScottishPower Renewables)

Dear Sir or Madam,

I am writing as acting Chair of Visit Mull and Iona, the Destination Marketing Organisation for the islands of Mull and Iona, to formally object to the above applications for consent under section 36 of the Electricity Act 1989 and for a marine licence under Part 4 of the Marine (Scotland) Act 2010. I request that this objection be formally recorded and that I am notified of the outcome of both applications.

Visit Mull and Iona represents 150 member businesses operating around 190 tourism enterprises across Mull and Iona, and our marketing activity also benefits a further 200 or so tourism businesses on the islands who are not members. Tourism is the predominant driver of the island economy, and our members have a direct and immediate interest in the outcome of these applications.

The proposed development would install between 91 and 144 turbines with a blade tip height of up to 335 metres, within a Windfarm Development Area of around 448 square kilometres to the northwest of Islay and west of Colonsay. At its closest point the site lies approximately 21 kilometres, or around 13 miles, from Iona and the Ross of Mull, and around 12 kilometres from Colonsay, placing turbines of this scale far closer to inhabited coastline than is typical for offshore wind development of this size elsewhere in the United Kingdom. A turbine of 335 metres is taller than the Eiffel Tower, and objects of this height and number, sited this close to shore, would be visible as a continuous engineered feature across what is currently an undeveloped Atlantic horizon.

Landscape, Seascape and Visual Impact

The defining quality of Mull and Iona's coastline is its openness and the absence of large-scale development, and it is precisely this quality that draws the visitors on whom our members depend. The proposed turbines would be visible not only from the coastline but from elevated ground across Mull, including Ben More and Burg, and would be seen directly behind Staffa and within the setting of the Loch na Keal National Scenic Area, a designation covering some 44,250 hectares of land and sea recognised for its bold, rugged and wild character and the awe inspiring pattern of islands and indented coastline that reinforces a sense of remoteness.



National planning policy allows development affecting a National Scenic Area to proceed only where the area's integrity is not compromised, or where any harm is clearly outweighed by benefits of national importance; a wind farm whose electricity is destined for the grid in South Ayrshire and onward to Wales, rather than to the islands whose seascape absorbs the harm, cannot meet that test.

The applicant's own assessment appears to systematically discount the magnitude of change to sensitive receptors beyond around 20 kilometres, applying what functions as an unstated distance threshold regardless of a receptor's sensitivity or national importance. On this basis Staffa, at around 35 kilometres from the site and just beyond the distance for which NatureScot requested assessment, is found to experience only small-scale change with no significant effect, notwithstanding that the same assessment separately acknowledges Staffa's panoramic maritime qualities as among the most celebrated in Europe. Ulva, a community owned island within the same National Scenic Area and at an early stage of its own regeneration, receives no dedicated assessment at all, despite that island's recovery being closely tied to the preservation of its unspoilt setting. A methodology that reduces the perceived significance of harm simply because of distance, rather than assessing the true extent of change experienced by the communities and landscapes affected, does not provide the Scottish Ministers with a reliable basis for decision making.

The visual assessment itself rests on static photomontages, which cannot represent the lived experience of the visitors and residents who encounter this seascape from moving boats, including the crossing between Mull and Iona, and it omits critical visitor viewpoints such as St Columba's Bay and Càrn Cùl ri Èirinn entirely, leaving the Scottish Ministers without evidence to assess effects on two of the area's principal cultural viewpoints. The applicant has to date produced only a single photomontage from Iona itself, and it is well recognised that this standard visualisation method understates the perceived scale and visual prominence of turbines of this size. Beyond the visual effect during daylight, the high intensity aviation and maritime safety lighting required across a turbine field of this scale would introduce continuous light pollution into what is currently a dark sky environment valued by residents and visitors alike.

Taken together, these effects amount to a fundamental change in the character of a nationally and internationally significant seascape, not a marginal or reversible one, and the harm falls squarely within the areas of greatest landscape and seascape sensitivity in the west of Scotland.



Historic and Cultural Heritage

Iona's international significance rests on a continuous religious and cultural history stretching back to the founding of a monastery there by Saint Columba in 563 AD, from which Christianity spread across Scotland and much of northern Britain, and which produced one of the great works of early medieval European art. The abbey and the adjoining nunnery, the most complete surviving nunnery complex in Scotland, are scheduled monuments, and the wider island retains an unbroken pattern of pilgrimage that continues to this day.

This is not a heritage confined to a set of buildings: it is a heritage of setting, defined by the crossing to the island, the open Atlantic horizon visible from the abbey grounds and from historic routes such as the road linking the village to the abbey, and the sense of remoteness and simplicity that has drawn pilgrims, scholars and visitors for fourteen centuries.

A wind farm of this scale, height and proximity would be visible directly behind and beyond this historic setting, introducing a permanent, repetitive industrial skyline into sightlines that have remained substantively unchanged since the early medieval period. This is precisely the kind of harm the setting protections attached to scheduled monuments and nationally important cultural landscapes exist to prevent, and the applicant's assessment, resting as it does on a single photomontage from Iona and no dedicated seascape assessment of the island's historic viewpoints, has not demonstrated that this harm has been properly identified, still less that it has been avoided. Approval of a development on this scale within sight of one of Scotland's most important religious sites would also set a precedent with implications well beyond this application, for how much protection any nationally and internationally significant heritage setting on Scotland's west coast can be expected to retain against future industrial development at sea.

Ecological and Marine Disruption

The site lies close to internationally important concentrations of breeding seabirds. The Treshnish Isles are designated a Special Protection Area for nationally important nesting seabird populations, including an internationally important breeding population of storm petrel, and support tens of thousands of guillemot, razorbill, puffin, kittiwake, fulmar, shag and skua at colonies such as Dun Cruit on Lunga; Staffa supports its own puffin colony. Both island groups, together with Iona and Mull, are also known for the corncrake, a rare and strictly protected species whose presence is itself a significant draw for wildlife tourism.



The applicant's assessment is understood to have omitted the corncrake despite the area's recognised importance for this species, and local wildlife tour operators, drawing on ornithological advice, have raised concern that corncrake migratory flight paths cross the site at heights that intersect the turbines' rotor swept zone. Any assessment that does not properly address this risk cannot be relied upon to inform a decision affecting a species of this conservation importance.

The site also lies within an area of recognised importance for marine mammals. The Sea of the Hebrides Marine Protected Area, immediately adjacent to the site, was designated in 2020 to protect minke whale and basking shark, the first Marine Protected Area for minke whales in the United Kingdom and the first for basking sharks anywhere in the world, while the Inner Hebrides and the Minches Special Area of Conservation protects harbour porpoise in the same waters.

Dolphins, porpoises, minke whales and basking sharks are regularly sighted by wildlife tour operators working from Mull and Iona, sightings have increased in recent years, and humpback whales, absent from the area for over sixty years following the end of Hebridean whaling, have begun to return. Construction of a wind farm of this scale would require prolonged pile driving and vessel activity across the site: pile driving is capable of injuring or deafening marine mammals at close range and disturbing their behaviour at considerable distance, and harbour porpoise in particular, among the most acoustically sensitive of cetacean species, are known to be displaced by vessel activity even before piling begins. Where a Likely Significant Effect on a protected site cannot be excluded, the Habitats Regulations require a proper Appropriate Assessment and, where adverse effects on site integrity cannot be ruled out, satisfaction of a strict alternatives and imperative reasons test before consent can be granted; nothing in the information available to residents and members of this organisation demonstrates that this test has been met for either the seabird colonies or the protected marine mammal populations surrounding this site.

The loss or disturbance of this wildlife would not be a purely ecological harm. Wildlife tourism, built around seabird colonies, corncrakes and marine mammal sightings, is a significant and growing part of the visitor economy our members depend upon, and any material decline in these populations would directly damage the businesses this organisation represents.



Socio-Economic Impacts

The visitor economies of Mull and Iona are overwhelmingly dependent on tourism, drawing visitors from pilgrims and nature lovers to outdoor sports enthusiasts, seafood lovers, artists and photographers, all attracted by the unspoiled natural environment, rare wildlife and unique cultural heritage this application would place at risk. No reliable baseline statistics exist for the specific importance of tourism to the economies of Mull and Iona, since Argyll and Bute wide statistics are not representative of these islands, but the scale of ferry passenger numbers relative to the resident population makes clear that tourism is the dominant component of the island economy.

A development of this scale required a bespoke, place based socio-economic assessment of Mull and Iona, and none was undertaken. No input was sought from residents, businesses or visitors on either island; the applicant's own consultant has confirmed that Iona's economy was considered too small a sample size for their standard research methods and has instead relied on proxy data drawn from existing wind farm developments elsewhere to predict how tourism employment might change here. On this flawed basis, the assessment assigns Mull's tourism economy a "low sensitivity" rating, implying it could absorb industrial change of this kind without fundamental loss, a conclusion that bears no relation to the reality of a fragile, landscape-dependent island economy.

The assessment also fails to address the interdependence of Iona, Staffa and the Treshnish Isles with the wider economy of Mull: ferry statistics indicate that at least a third of Mull's visitors are travelling to see these outlying islands, meaning any harm to their appeal is, in practical terms, harm to the whole of Mull's visitor economy. Despite this, the applicant did not approach Visit Mull and Iona or any hospitality business on Mull or Iona directly, and its drop in consultation events were confined to Fionnphort and Buessan, disregarding the island wide, economically interdependent nature of the tourism offer.

This falls well short of the standard required by national policy. The National Marine Plan, at general policy GEN 19 and paragraph 4.81, requires that decisions be founded on robust socio-economic evidence and that a precautionary approach be taken wherever that evidence is insufficient; NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 together require island communities' interests to be properly assessed and weighed through meaningful engagement from the earliest stages of a proposal to its conclusion.



The applicant has itself acknowledged that island communities warrant particular scrutiny yet has not carried out the assessment needed to understand this proposal's effects on them. In the absence of that assessment, the compatibility of this proposal with the sustainability of Mull and Iona's communities has not been demonstrated, and the statutory duty owed to those communities has not been discharged.

Community Benefit and Equity

The electricity generated by this development would be exported by subsea cable to a grid connection in South Ayrshire and distributed onward towards Kilmarnock and Wales; no electricity would be supplied to the island communities that would bear the visual, ecological and economic cost of hosting it. Both Scotland and Wales are already net exporters of electricity, and constraint payments to existing wind farms, including reported payments of around £65 million to Scotland's largest offshore wind farm in 2024 alone to reduce its output, raise a legitimate question as to why a development of this scale and impact is necessary in this particular location at all.

Community benefit from offshore wind development is voluntary rather than mandatory, and the applicant has confirmed it cannot indicate what, if any, benefit will ultimately be offered.

The indicative measures raised to date, a small donations fund of grants up to £500, five apprenticeships spread across the whole of Argyll and Bute, and a proposed capacity fund of £500,000 across the twenty five year lifespan of the project, equivalent to around £20,000 a year across the entire council area, bear no meaningful relationship to the scale of harm this development would cause to Mull and Iona specifically.

There is no local return for the loss of the scenic beauty upon which these fragile island economies depend, and the site itself was selected, on the applicant's own account, on the basis of ease of development rather than any assessment of harm to the communities nearby.

This sits uneasily alongside the planning restrictions these same island communities operate under themselves, where even modest community renewable proposals, including a small-scale community wind turbine for Iona, have been refused on height and visibility grounds that a development of this magnitude would dwarf many times over.



Mental Health and Wellbeing

The people of Mull and Iona are deeply invested in the landscape, wildlife and tranquillity of their environment, both for its own sake and because it provides their livelihoods. The applicant's own consultants identified habitability as a significant risk pathway for island communities, yet no place specific assessment was undertaken of how the changes this development would bring might affect the long-term viability of living and working on these islands. A development of this scale carries a real risk of harming mental health and wellbeing among residents, through threats to livelihood, the loss of a cherished and unspoiled landscape, and a sense of powerlessness in the face of decisions taken by government and industry with little meaningful local consultation. Many residents act as informal custodians of the bird and marine life this application places at risk, and the prospect of witnessing the decline of species they have long protected is itself a source of genuine distress that this application does not address.

Conclusion

For the reasons set out above, this application fails to meet the standards required by the National Marine Plan, the National Planning Framework, the Habitats Regulations and the statutory duties owed to island communities under the Islands (Scotland) Act 2018. The socio-economic evidence base is inadequate, the landscape and seascape assessment systematically understates harm to nationally and internationally important designations, the ecological assessment leaves unresolved risks to protected seabirds and marine mammals, and the benefits offered to the communities that would bear this harm are wholly disproportionate to it. I urge the Marine Directorate and the Scottish Ministers to refuse both applications. I would be grateful if you could acknowledge receipt of this objection.