

This Supplementary report is a recommended response to the Scottish Government's Marine Directorate (MD-LOT) Section 36 Consultation on the proposed Machair Offshore Wind Farm.

Reference No:	26/01100/S36 and MD-00012385 / MD-00012386
Applicant:	Scottish Power Renewables/MachairWind Limited
Proposal:	A project design envelope approach comprises 91 335m blade tip height turbines or 144 280m blade tip height turbines above lowest astronomical tide within the Wind Development Area (WDA), offshore substation platforms, inter-array cabling, and associated infrastructure. The turbines will have a combined rated capacity of approx. 2GW.
Site Address:	15km northwest of Islay and 12.4 west of Colonsay within the W1 Plan Option Area with a total area of 448 km2

SUPPLEMENTARY REPORT NO. 1

1. INTRODUCTION

This application is to be presented to the Planning, Protective Services and Licensing (PPSL) Committee on 15th September 2026. Following the publication of the Report of Handling, it has become evident that two consultation responses submitted to the Council have been omitted from the report in error. These are summarised below and are available in full on [the Council's public access system](#).

Jura Community Development Trust (summary of response dated 14.8.2026): Recognises the need to increase renewable energy generation and supports principle of investing in sustainable, low-carbon energy. Neither supports or objects to the proposal and raises the following points:

- **Consultation and community participation:** Recognises the time and effort spent engaging with local communities throughout the development of the proposal – however consultation sits relatively low on the ladder of participation and for developments of this scale and significance, the ambition should be to move towards genuine partnership, shared influence and community empowerment.
- **Scale and Proportionality:** Machair is a nationally significant infrastructure project that will have implications for the surrounding islands for decades. Large scale projects should be judged on whether they leave host communities stronger, wealthier and more resilient by ensuring a greater share of economic value remains within rural and island economies.
- **Transparent Framework for Community Benefit:** If consent is granted the focus must shift towards securing the highest possible level of community participation, ownership and long-term benefit by establishing an accountable framework for community benefit. This should include a clear methodology for how community benefit is calculated, transparent arrangements for allocating funds between communities, locally accountable governance structures, meaningful community representation in

decision-making, community priorities driving investment decisions, regular public reporting on funds received, investment decisions and outcomes and periodic review over the lifetime of the project.

- **Beyond Annual Community Benefit Funds:** If consent is granted, a development of this scale should include opportunities for community ownership or equity, strategic investment in community infrastructure, affordable housing, community owned renewable energy and local energy resilience, transport and digital connectivity, skills, apprenticeships and long-term employment pathways, economic diversification and local enterprise and capital investment that generates sustainable future income.

Islay Community Council (summary of detailed response 25.8.2026):

Seascape, landscape and visual impacts: The two coastlines nearest the development are those which the applicant's own consultants find to be significantly and adversely affected. From Loch Gruinart the applicant calculates that the Project would occupy up to some 65 degrees of the horizon, and it records that the turbines would appear on the skyline behind the northern Rhinns peninsula and *"may therefore be perceived as an onshore wind farm rather than an offshore development"*. The applicant does not present these effects as capable of being reduced. In the operational assessment for CCA 20 it states that the introduction of the Project into views out towards the open sea would adversely affect the sense of being at the edge of the British Isles, and that views along the coast towards distinctive features including the Dun Bheolain headland would also be adversely affected. Policy 30 of the Local Development Plan supports renewable energy development only where it can be adequately demonstrated that there would be no unacceptable environmental effects on local communities, landscape character and visual amenity; that demonstration has not been made for these coastlines. The Community Council submits that the proposal is in conflict with NPF4 Policy 4(d), with the concession relied upon in Policy 11(e)(ii), with GEN 7 of the National Marine Plan and with Policy 30 of the Local Development Plan; that the conflict is established on the applicant's own evidence; and that it is a conflict of substance rather than of form, because it concerns significant adverse effects, along the entire length of two designated coastlines, which the applicant proposes to do nothing to reduce.

The setting of Islay's coastal monuments: The coastlines which the applicant assesses as significantly affected are also where the coastal monuments of western and northern Islay stand. The setting of a heritage asset is capable of being harmed by development at a distance, without any physical interference with the asset itself. A study area of the development area with a 50 km buffer was agreed with Historic Environment Scotland for the purpose of assessing effects on the setting of designated assets. Within that 50 km there are 178 scheduled monuments, distributed across Tiree, Coll, Iona, Mull, the Garvellachs, Colonsay and Islay. The relevant Islay assets are not incidental features. The applicant's own coastal character baseline describes the west coast of the Rhinns as rich in ancient monuments, and records forts at Dun Bheolain and Beinn a' Chasteil, standing stones at Ballinaby and a chapel at Kilchiaran, together with the remains of a chapel and an unmanned lighthouse on the offshore island of Orsay; on the northern coast it records the lighthouse at Ruvaal. Historic Environment Scotland identified likely significant effects on its historic environment interests. It advised that the proposed development was likely to affect the setting of a number of scheduled monuments, and in particular those of early Christian character whose cultural significance depends upon a sense of isolation, a position at the edge of the land and a relationship with the open sea. Among the assets it named were two on or immediately off Islay: Beinn a' Chaisteil promontory fort and associated remains (SM13213) on the north-west coast, and the monastic site, chapel, burial ground and associated remains on Nave Island (SM3233) identification of Dun Bheolain fort on Islay as a further asset likely to be significantly affected. On the recorded advice of the statutory adviser, the effect of this development upon the setting of at least one scheduled monument on Islay is capable of being fundamental, and capable of raising issues of national importance. That advice was given at

a stage when redesign was said to remain possible, and no redesign responsive to it appears on the record. If the Ministers find substantial harm to a designated asset, GEN 6 permits consent only exceptionally and only where the harm is outweighed by the benefits which the development is necessary to deliver, which returns the decision to the reduced weight properly attaching to the claimed benefit, and to the absence of any assessed benefit of local importance.

The location, advice given and alternatives rejected: The harm described is a function of two variables only: how far the turbines stand from the island, and how large they are. Both were the subject of express advice from the Scottish Ministers' own statutory adviser before this site was fixed, and both were the subject of alternatives which the applicant examined and rejected. The nearest turbines would stand approximately 15 km from Islay, which is under half the advised separation, and the tallest would reach 335 m, which exceeds the advised ceiling by more than two thirds. Reliance upon the [Sectoral Marine] Plan and the lease does not answer the objection as the is not the statutory marine plan for the purposes of the Marine (Scotland) Act 2010; and it is against that Scotland's National Marine Plan that these marine licence applications fall to be determined. The plan-level assessment which accompanied the Sectoral Marine Plan expressly deferred project-level scrutiny of effects to the consenting stage, which is this stage. And the grant of a seabed lease by Crown Estate Scotland confers no entitlement to consent; the Scottish Government's offshore wind ambition is itself expressly subject to rigorous project-level consenting and impact assessment. The two variables which produce the harm were both examined as alternatives, and both were rejected for a stated reason. The applicant has produced a chapter dealing with site selection and alternatives and the applicant's Without Prejudice Derogation Case sets out six Project Objectives against which alternatives were appraised. The sixth is to optimise the W1 Plan Option Area and maximise the generation capacity of the available Scottish seabed. Measured against those objectives, a reduced development area and a reduced number of turbines were both considered and both discounted.

The Community Council submits that where harm to a designated landscape is the consequence of a design choice made in preference to available and less harmful alternatives, that harm falls to be weighed as a chosen harm, and the second limb of Policy 4(d) becomes correspondingly harder to satisfy: benefits said to outweigh the harm must outweigh a harm which need not have been incurred at the level proposed. Beyond the five-metre adjustment already discussed, the EIAR identifies no mitigation of the seascape and visual effects on Islay. The Ministers are accordingly considering a proposal in which conceded significant adverse effects on a designated landscape area attract no mitigation at all.

Islay and an affected island community: The applicant's socio-economic consultants, BiGGAR Economics, recorded that there are potential impacts on habitability for island communities in particular. Habitability, in that context, means the capacity of an island to remain a place where people continue to live and work. Chapter 18 of the EIAR and its technical appendix do not then examine that question for Islay. Islay appears within the assessment, by reason of its potential role as a direct project location, that is, as a place where project activity might be based. It is not assessed as an affected island community whose exposure to the development has been measured. The employment and Gross Value Added benefits of the Project are quantified at Scotland and United Kingdom level, and at that level only. Not one of those figures is given for Islay, for the Inner Hebrides, or for Argyll and Bute.

The two coastlines which the applicant finds to be significantly affected are not empty ground. CCA 20 contains the settlements of Portnahaven and Port Wemyss, scattered farmsteads and houses, a distillery at Kilchoman near Machir Bay, and a coastline which the applicant itself records as a surfing venue at Machir Bay and as rich in ancient monuments. The island's economy rests on distilling, agriculture and tourism, and its visitor economy is founded on the coastal landscape, the birds and the beaches. Whether significant adverse change to those

coasts would affect the island's visitor economy, its businesses and its working population is precisely the question the applicant's consultants raised and which Chapter 18 of the EIAR does not answer. The Community Council notes the absence of assessment in line with Marine Directorate guidance to the effect that local study areas should reflect the appropriate impacts and be understandable to the communities they describe. A proposal which has not assessed the affected community cannot demonstrate that local and community benefit has been maximised. The local balance of benefit and harm is unquantified on both sides. ICC further invites Argyll and Bute Council to exercise its power under section 14 of the Act to request a retrospective island communities impact assessment of the Sectoral Marine Plan for Offshore Wind Energy.

Officer comment: please see response in the Report of Handling in relation to Island Communities Impact Assessments.

The marine environment: The Community Council adopts the representations of NatureScot, RSPB Scotland and the other specialist bodies so far as consistent with this objection and asks that substantial weight be given to that evidence.

Commercial fisheries and displacement of fishing effort: Fishing effort excluded from 448 km² of sea does not cease; it relocates. The consequences of relocation, being gear conflict and increased pressure on adjacent grounds, are borne by the same small fleets, and they are consequences which the applicant's own chapter identifies.

Navigation, lifeline connectivity and safety at sea: The applicant's shipping and navigation chapter assesses seven impacts. They include reduced access to local ports and harbours and a reduction of emergency response capabilities. The ferry services operated by Caledonian MacBrayne are among the navigational receptors identified, which is to say that the lifeline services upon which Islay depends for passengers and freight are within the assessed zone of effect. The Community Council draws attention to the scale of the vessel activity which would accompany the development, because it bears directly on both matters. On the applicant's realistic worst case the construction programme would involve 117 vessels and 5,699 vessel return trips over five years, with vessels assumed to be operating 24 hours a day within the development area, followed throughout the operational phase by some 423 vessel movements and 576 helicopter movements each year.

Habitats regulations: The applicant's Report to Inform Appropriate Assessment concludes that no adverse effect on the integrity of any European site would arise, and the applicant maintains that no derogation is required. In the same application, however, the applicant has lodged a Without Prejudice Derogation Case together with a Without Prejudice Guillemot Compensation Plan, both directed at a single feature of a single site: the guillemot of the North Colonsay and Western Cliffs Special Protection Area. Its stated reason for doing so is that the competent authority "may not reach the same conclusion" as the applicant. The applicant has judged it necessary to plan for a conclusion of adverse effect on the integrity of that site in respect of that feature. Where a well-advised promoter, in possession of the full survey and modelling record, considers that the competent authority may properly reach the opposite conclusion on the science, the question is not one from which reasonable scientific doubt has been excluded.

If the Ministers were to conclude that there would or might be an adverse effect on site integrity, consent could be granted only if three cumulative tests were satisfied: that there is no alternative solution, that there are imperative reasons of overriding public interest, and that the necessary compensatory measures are secured. The second concerns compensation. The applicant records that the Regulations governing compensatory measures came into force in May 2026 and apply to this Project, and that the Scottish Government's statutory guidance supporting those requirements has not yet been published. The Community Council

submits that the adequacy, deliverability and long-term security of any compensatory measure would require to be established on evidence before consent could be granted, and that the absence of the governing guidance is a matter the Ministers should weigh when considering whether that has been achieved.

Claimed climate benefit: the Project emits some 2.81 million tonnes of carbon dioxide equivalent more than the 'do nothing' scenario against which it is measured. The reported benefit of 2,851,685 tonnes is the result of subtracting the operational phase emissions alone, 1,904,549 tonnes, from the whole 35-year Do Nothing total of 4,756,234 tonnes. Construction, decommissioning and the transmission infrastructure, amounting together to 5,658,469 tonnes, or 75% of the Project's own footprint, are absent from one side of the comparison. Construction alone accounts for approximately 66% of the WDA's lifecycle emissions, and the applicant records that 88% of the construction figure is embodied carbon in materials. The applicant's own intensity figures disclose the same difficulty from a different direction, and this comparison is made on a consistent basis. Chapter 19 reports the whole Project's carbon intensity as 32.9 g CO₂e per kWh. The emission factor from which the Do Nothing baseline is constructed is 20.7 tonnes CO₂e per GWh, which is 20.7 g CO₂e per kWh. Per unit of electricity delivered, the Project as assessed is therefore more carbon-intensive than its own counterfactual, by a margin of approximately 59%.

The response also raises matters in relation to Raeshaw Farms Limited v Scottish Ministers; Aviation lighting and the night-time environment; other marine users, major accidents and pollution risk; climate resilience of the development itself; blue carbon; inter-related and combined effects and securing mitigation.

Islay Community Council requests that the Scottish Ministers **REFUSE** consent under section 36 of the Electricity Act 1989 and **REFUSE** the associated marine licence applications.

2. CONCLUSION

These matters do not raise any new concerns that have not already been addressed in the Report of Handling and PPSL Committee Report where relevant to the Council's areas of interest to this consultation response. On matters where other statutory consultees are better equipped to respond in terms of expertise, Argyll and Bute Council would defer to their advice to the Scottish Government Marine Directorate.

Author of Report: Shelley Gould
Reviewing Officer: Peter Bain

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Fergus Murray
Head of Development and Economic Growth