



Machair Wind Farm Seascape, Landscape and Visual Review DRAFT

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Argyll & Bute Council

Argyll & Bute Wind Farm SLVIA
31 August 2026





Machair Wind Farm
Seascape, Landscape and Visual Review
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Limitations/ Assumptions

1. *The sole purpose of the report is to inform Argyll & Bute Planning Officers about the potential significant landscape and visual effects of the wind farm proposals.*
2. *The Section 36 Application documents sourced from the Applicant's website have been relied upon and presumed accurate in preparing the report, except where any inaccuracies or differences of opinion have been noted.*
3. *The assessments of likely significance not predicted in the EIAR but included in this report are provisional and based upon limited time and site survey and with further information may be subject to revision.*

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■ Introduction

This review of seascape, landscape and visual effects of the proposed wind farm has been undertaken by Argyll and Bute Council's consultant landscape architect, Jacobs. It has been based on examination of the Environmental Impact Assessment Report (EIAR) and in particular the Seascape, Landscape and Visual Impact Assessment (SLVIA) in Chapter 16 accompanying the Section 36 application 00012385 and submitted 25th June 2026, a site visit to Islay and knowledge of the area surrounding the proposal gained from previous visits.

■ Description of proposals

The proposal is located within the W1 Plan Option Area in the Atlantic waters west of the Inner Hebrides. The windfarm development area (WDA) lies predominantly within an open marine environment near Islay, Jura, Colonsay and Mull, with the nearest coastline located on Colonsay, approximately 12.4km to the east. The surrounding seascape is characterised by a complex arrangement of islands, skerries, sounds and channels, which include several nationally and locally designated landscapes.

The WDA covers approximately 448km², with water depths ranging from approximately 21.6m to 81.7m below Lowest Astronomical Tide (LAT).

The principal components of the proposal comprise:

- Up to 144 offshore wind turbine generators (WTGs);
- Inter-array cabling connecting turbines within the WDA;
- Fixed-bottom offshore substation platforms and associated infrastructure;
- Offshore export cables with associated protection;
- Fixed-bottom foundations with associated scour protection;
- Fibre optic communications cables integrated or bundled with the offshore cables.

The project has been assessed using a design envelope comprising of two realistic worst-case scenarios:

- Up to 144 WTGs with a maximum blade tip height of 280m above LAT;
- Up to 91 WTGs with a maximum blade tip height of 335m above LAT.

These scenarios have been assessed for the purposes of the EIAR and SLVIA.

The proposal also includes aviation lighting on selected turbines in accordance with aviation safety requirements, the effects of which have been considered within the SLVIA.

The WDA is not located within any nationally or locally designated landscape. However, there is theoretical visibility that extends to several designated landscapes including the Jura National Scenic Area (NSA), Loch na Keal, Isle of Mull NSA, and Scarba, Lunga and the Garvellachs NSA, as well as several Argyll and Bute Local Landscape Areas (LLAs). Potential visibility from sections of the Ben More, Mull Wild Land Area (WLA) and Jura, Scarba, Lunga and the Garvellachs WLA has also been identified within the assessment.

■ Information submitted by the Applicant

The SLVIA set out in Chapter 16 appears to generally accord with the Guidelines for Landscape and Visual Impact Assessment Third Edition and other best practice for wind farm assessment. The Coastal Character Baseline and Assessment presented in Appendix 16.3 also appears to accord with NatureScot's Coastal Character Assessment – Guidance Note. The SLVIA is supported by a range of technical appendices, figures, wirelines, photomontages and ZTV analysis.

The landscape assessment is generally comprehensive and provides a substantial body of information from which to review the likely seascape, landscape and visual effects of the proposal. Whilst we agree with most of the landscape assessment conclusions, several judgements relating to magnitude and significance of effects appear somewhat conservative, particularly where the proposal influences perceptions of remoteness, wildness and the relationship between the landscape and sea. These are discussed further in the relevant sections of this review.

We have not agreed with all of the visual assessment and relevant commentary regarding this is presented in the visual assessment section.

The visualisations generally appear to accord with current best practice guidance and provide a reasonable representation of the proposal.

However, the ZTVs supplied in the ES Figures are extremely difficult to read due to the similarity between the faint yellow tint of the areas with most turbines visible and areas of no visibility which do not have a tinted background. Additionally, the main ZTV is not of a quality that detailed examination of visibility can be reviewed. More detailed ZTV information of the ZTV is supplied in the inset maps with the viewpoint figures, but these do not cover the entire Study Area, only the areas around the viewpoint locations. Consequently, it is impossible to establish the exact location of theoretical visibility accurately across the whole Study Area.

The assessment includes consideration of designated landscapes, landscape and coastal character, visual effects, aviation lighting effects and cumulative effects. Wirelines and photomontages have been provided for 30 viewpoints, which generally present a robust base of evidence from which to review the assessment. It is noted that photomontages of Viewpoints 18 (Scarba) and 24 (Staffa) have not been included within Appendix 16.4. Whilst accompanying wirelines are included, the absence of photomontages limits the ability to fully review the visual effects predicted from these locations and verify the findings in the assessment.

There are several presentational issues, inconsistencies and matters requiring clarification that have been identified through this review and are discussed in the relevant sections below.

■ Scoping

A turbine layout comprising up to 147 WTGs on fixed foundations with blade tip heights of 260m (smallest) or 340m (largest, 88 turbines), on a site of 510km² formed the basis of the EIA Scoping Report submitted to the Scottish Government in September 2024. Two public exhibitions were held, the first in Summer 2025 and the second in Autumn 2025.

Relevant extracts of Argyll and Bute Councils Scoping Opinion are summarised as follows:

- *It is noted from the Scoping Report that the potential effects of the proposed development on landscape character and visual amenity will be assessed through a Landscape and Visual Impact Assessment (LVIA), which will follow GLVIA, 3rd Edition and NatureScot advice/guidance on good practice for landscape and visual assessment of wind farm proposals. This is agreed as appropriate guidance for the assessment. All elements of a development are important to consider within any EIAR.*
- *it is welcomed that number of viewpoints as suggested by the local communities have been included in the methodology for the SLVIA.*
- *The boundary of 30km should be extended to include the Southwest and South and East LLAs of Islay which fall within the ZTV at distances of 30km to 40km.*
- *We are satisfied that all relevant consultees have been engaged. We would defer to the expertise of NatureScot on Seascape matters.*

NatureScot's Scoping Opinion notes that:

- *Whilst the Jura, Scarba, Lunga and the Garvellachs Wild Land Area (WLA 05) is proposed to be scoped out of the assessment, we consider that there is a clear commonality between some Special Landscape Qualities (SLQs) of the Jura National Scenic Area (NSA) and Wild Land Qualities (WLQs) of WLA 05, with WLQs providing additional information and context for the SLQs. Therefore, we advise that the relevant WLQs of WLA 05 be drawn upon to inform the assessment of effects on special landscape qualities (AESLQ).*
- *we would advise that viewpoint 10, representative of the west coast of Jura, be in visualisation format. This viewpoint should be sited further east to ensure that effects on the location specific SLQ of the inaccessible Loch Tarbet 16 be captured. This would also facilitate easier access for site viewpoint photography.*
- *In relation to capturing impacts on landscapes of National Importance, we are content that all relevant receptors have been identified.*
- *Based on the information provided, we would reiterate our previous advice (email sent 23 May 2024) and recommend that a 40km radius landscape and coastal character study area be adopted. This is due to the proposed height of the turbines currently being considered, at 340m to blade tip above LAT, and the subsequent pattern of visibility over sensitive coastal landscapes*
- *We would like to take this opportunity to highlight that there could be cumulative impacts with the Haven Offshore Array wind farm proposal in Irish waters and this should be considered within the CEA.*
- *We would like to take this opportunity to reiterate concerns raised in our advice dated 23 August 2023 and 23 May 2024 regarding design considerations as follows:...*
 - *3 national scenic areas (NSA's) curve around the north and east sides of W1. Achieving moderate amounts of theoretical visibility, at similar distances c. 30km which while distant,*

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given the large size of the proposed turbines and the nature of sea views with little screening, (height of turbines over topping Colonsay potentially?) causes us some concern;

- *The special qualities highlight the frontier character, open Atlantic views, vast natural world and outstanding views and distances over which these views can be obtained and strong maritime influence on these protected landscapes;*
- *Distinctive, strong, and diverse coastal character; and*
- *Proximity to Islay and Colonsay with sensitive visual and landscape receptors.*
- *It states in Paragraph 832 that the Applicant intends to confirm the final layout design post consent based on the findings of pre-construction surveys. We advise that where significant effects are identified, these should be resolved as far as possible through adequate consideration of mitigation options as part of the application process and not post-consent.*

The SLVIA reports that post-scoping consultations were undertaken with a number of community councils, NatureScot and Argyll and Bute Council to further agree the viewpoints and several aspects of the assessment.

■ Design evolution

Chapter 4: Site Selection and Alternatives, describes an iterative process that has been undertaken to refine the WDA and reduce and mitigate potential environmental effects. The proposal is located within the W1 Plan Option Area (POA) which was identified through the Scottish Governments Sectoral Marine Plan for Offshore Wind Energy. Prior to the adoption of the Sectoral Marine Plan, the size of the POA was reduced to lower potential visual impacts and increase the distance from land.

Following the ScotWind Award in 2022, further potential constraints were reviewed by the Applicant within the Option Agreement Area (OAA), that resulted in a reduction from approximately 754km² to 510km² for the EIA Scoping WDA. There were numerous factors informing the refinement, including seascape, landscape and visual considerations, notably *a minimum buffer of 12km from Colonsay and 15km from Islay* to reduce these effects.

Following the Scoping Opinion, further constraints were identified through several workshops/webinars, which were undertaken alongside stakeholder and statutory consultation events held on Colonsay, Islay, Jura, Ross of Mull and Iona. The consultations resulted in a reduction of the WDA to 448km², equivalent to a 12% reduction in total area. This is illustrated by Figure 4.8 in Chapter 4.

The key design changes to the seascape, landscape and visual impacts were as follows:

- Reduction in the northern boundary to reduce the horizontal spread of the WTG lessening the effects on sensitive views, including views towards Dubh Artach Lighthouse from Mull and Iona.
- Reduction of the eastern boundary (0.4km) following consultation feedback regarding seascape, landscape and visual effects on nearby islands communities, increasing separation distance between the WDA and the coast.
- Removal of the southern extent of the Scoping WDA to reduce the horizontal spread of turbines and minimise potential effects on Islay, Colonsay, Jura and nearby National Scenic Areas (NSAs).

In addition to the refinement of the WDA boundary, the Applicant prepared a design strategy in collaboration with NatureScot. This strategy establishes a series of landscape and visual design objectives intended to minimise likely significant effects on the Special Landscape Qualities (SLQs) of the Jura, Loch na Keal (Isle of Mull) and Scarba, Lunga and Garvellachs NSAs. There are four themes that comprise the objectives, which include *Project Scale, Project Extent and Orientation, Turbine Layout* and *Location Specific Measures*. Collectively these aim to reduce the apparent scale and visual influence of the proposal, whilst recognising some seascape, landscape and visual change is inevitable. The design strategy (outlined in Appendix 15) acknowledges that design development is an ongoing process and that the design objectives will continue to inform refinement of the final turbine layout during post-consent stage, in consultation with NatureScot as required.

Overall, the design evolution demonstrates that seascape, landscape and visual considerations have informed the development of the project throughout site selection and refinement process. Whilst these measures are likely to have reduced the extent of the effects, significant residual effects remain for several landscape, seascape and designated landscape receptors identified within the SLVIA.

■ Landscape effects

There would be no direct effect on landscape elements or features as the proposal would be located offshore. The assessment acknowledges any effects on the landscape receptors would be perceptual and occur because of changes to outward sea views during both construction and operation phase. Effects on landscape character during construction phase are predicted to be short term and reversible, with those in the operation phase long term, reversible and adverse. The sensitivity for each of the landscape receptors has been evaluated as *high*. The assessment for each LCT is in section 16.10.1.1 and the summary is presented in table 16.66 of the SLVIA (Chapter 16).

We agree with most of the conclusions presented within the SLVIA in relation to effects on LCTs, with the assessment generally supported by the ZTV analysis, viewpoint assessment and visualisations. However, there are locations where the magnitude of impact appears conservative, particularly LCT 42 (Rocky Moorland - Argyll) south of Loch Gorm and LCT 35 (Rugged Mountains) on Jura. In these instances, the extent of visibility and the influence of the proposal on perceptual characteristics such as wildness, remoteness, openness and the relationship with the sea would justify higher magnitude and significance judgements than those presented in the assessment.

For LCT 42 (Rocky Moorland) the SLVIA assesses the magnitude of impact from the coastal edge and hills northwest of Loch Gorm as high, reducing to medium on the hills south of Loch Gorm and low elsewhere. On review a medium magnitude of impact south of Loch Gorm appears somewhat conservative during both construction and operation phases. While the assessment identifies a reduction in the scale of change from large to medium for these areas, the ZTV (Figure 16.12) indicates extensive visibility from the coastal edge and adjoining hills. The assessment also acknowledges the proposal introduces a notable new offshore feature across the northwest seaward horizon and influence perceptual qualities associated with the remote character of the landscape. Although offshore views are not specifically identified within the description of the LCT, the *exposed and windswept* character of the landscape, its *rocky coastline* and presence of isolated farms all contribute to a strong sense of remoteness and close relationship with the sea. This is illustrated in Figure 16.2.3a-l (Appendix 16.4). Given the extent of visibility, alongside the scale of the proposal and influence on these characteristics, it is unclear why the magnitude of impact reduces immediately south of Loch Gorm. We consider that the magnitude of impact (and therefore significance of effect) has been underestimated.

On review, the low magnitude of impact would appear conservative for LCT 35 (Rugged Mountains) units on Jura during both construction and operation phase. As illustrated from Viewpoint 11 (Beinn an Oir) in Figures 16.2.11b (appendix 16.4) and the ZTV analysis presented in Figure 16.12, the proposal would be visually prominent over a wide arc of view northwest. As such the turbines would influence the *strong wilderness qualities* of the LCT and as such a medium magnitude of impact resulting in **moderate** and **significant** effect, would be appropriate to the Jura units.

■ Seascape Effects

There would be no direct effect on the coastal character areas (CCA) as the proposal would be located offshore, between 10-20km from the nearest CCA. Other than CCA 21 – Loch Indaal, Islay which is evaluated to be of medium sensitivity. All other CCAs have been evaluated to be high sensitivity. The assessment for each CCA is in Appendix 16.3 and supported by the ZTV analysis in figure 16.12 of the SLVIA (Chapter 16). In addition, a summary of potential effects during construction, operation and maintenance and decommission is presented in table 16.66 of Chapter 16.

Whilst we agree with the findings in much of the CCA assessment and consider it to be comprehensive and generally accord with the relevant guidance, we consider that the assessment underestimates the magnitude of impact and significance of effects on several CCAs, particularly where the proposal would influence key characteristics that relate to remoteness, wildness and openness and the relationship between the coast and the sea.

For CCA 7 – Ross of Mull, the assessment of a medium magnitude of impact, resulting in a moderate level of significance appears conservative. The ZTV (Figure 16.12) indicates extensive visibility along the southern coastline, particularly the western extent. Viewpoint 20 – Erraid, Mull which illustrates the scale of change that would be experienced from these areas and demonstrates that the proposal would become a notable feature in sea views. We consider that the assessment underestimates the scale of change. This is particularly relevant in relation to the key characteristics associated with *wildness* and *long views south across the Sea of the Hebrides*. Given the extent of visibility and the influence of the proposal on these characteristics, a high magnitude of impact, resulting in a **major** significance of effect, would be appropriate.

There appears to be an error for the assessment of CCA 14 – Rubha an t-Sailein to Glendebadel Bay, Jura. The assessment states the *area predominantly faces east and northeast*. However, the coastline is orientated west and northwest towards Islay and Colonsay.

For CCA 15 - Loch Tarbert, Jura, the assessment (Appendix 16.3, Table 2.24) of a medium magnitude of impact resulting in a **moderate** significance of effect appears conservative. The assessment does acknowledge the proposal would be visible across much of the western end of the CCA and would introduce *a notable new feature into views towards the open sea*. It also recognises that the proposal would *detract from the sense of wildness and the lack of modern human influence experienced in this area of coastline* and that *the channelled views along the loch towards the open sea would be affected*. These effects relate directly to several of the key characteristics of the CCA, including its orientation towards the sea, *dramatic seaward vistas* and *strong sense of remoteness*. Given the wide arc of view at the western end of the CCA, and the assessments acknowledgement that *in some views the turbines will fill the sound*, we consider that a high magnitude of impact and **major** significance of effect, would be appropriate. There is no reference in the assessment to Viewpoint 10 (Loch Tarbert, Jura) Which emphasises the scale of change the proposal would introduce to western views across the Atlantic from the CCA.

The colours used to delineate CCA 17 – Sound of Jura and LCT 55 - Coastal Parallel Ridges are very similar in Figure 16.12, making it difficult to distinguish between the two and accurately interpret the area under assessment. Consideration should be given to revising the colour palette to improve legibility and provide greater clarity regarding the extent of the CCA.

For CCA 18 – Sgairail, Islay, we consider that the magnitude of impact would be high, rather than medium, increasing the significance of effect from **moderate** to **major**. The proposal would be located predominantly within 20km of the CCA and, according to the ZTV analysis (Figure 16.12), would be visible across much of its

extent. Given the scale of the development, the extent of visibility and long- term nature of the effects, the degree of change to the CCA may be greater than reflected in the assessment. The introduction of the proposal has the potential to influence key characteristics, such as *strong sense of wildness* and *Expansive views towards the open sea and the islands of Oronsay, Colonsay, Mull and Jura*, the latter for which is noted.

For CCA 20 – Ardnave Point to Rhinns Point, Islay, the assessment of a medium magnitude of impact, and **moderate** significance of effect, appears conservative. The assessment (Appendix 16.2, Table 2.30) acknowledges that the proposal would be visible along most of the CCA and would affect multiple key characteristics, including the sense of being *at the outer edge of the British Isles* and *Open views out to the Atlantic Ocean*. The assessment also identifies a large geographical extent of effects and notes that the proposal would occupy a very wide horizontal angle of view of up to 71 degrees. It is also notable that the assessment of visual effects experienced at Viewpoints 1 (Ardnave Point), 2 (Saligo Bay) and 4 (Creag Bealach na Caillich), which are representative of views experienced along the CCA, are all assessed as being of **major** and **significant**. Given the widespread visibility of the proposal, its influence on multiple key characteristics and the large geographical extent, we consider that the overall magnitude has been underestimated and a high magnitude of impact and **major** and **significant** of effect would be appropriate.

■ Landscape designations

Landscape planning designations and WLAs within the SLVIA 60km Study Area are illustrated in Figures 16.13 and 16.14 in Chapter 16. A ZTV analysis, in conjunction with desk and field-based research, was used to determine which designated landscapes and WLAs may be scoped out of assessment because they are unlikely to experience significant effects. In agreement with statutory consultees six landscape designations were scoped into the SLVIA and have been assessed in detail in Appendix 16.2 and section 16.10.1.5 of the SLVIA. In addition, a study area of 40km for assessment of effects on landscape (LCT) and seascape (CCA) receptors as identified in the assessment methodology in Appendix 16.1 was agreed with NatureScot and Argyll and Bute Council. The SLVIA states that beyond 40km, effects on landscape designations are unlikely to be significant and this has been based on professional judgement and experience. The landscape designations within the assessment are listed below:

- the Jura NSA located approximately 25km southeast of the proposal;
- the Loch Na Keal, Isle of Mull NSA located approximately 31km northeast of the proposal;
- the Scarba, Lunga and the Garvellachs NSA located approximately 42km west of the proposal;
- the North and West Islay (Coast) LLA located approximately 15km southwest of the proposal;
- the Central, South and West Mull LLA located approximately 20km northeast of the proposal; and
- the Jura LLA located approximately 30km east of the proposal.

The landscape designations scoped out of the report include:

- the Knapdale NSA located approximately 45km east of the proposal. Scoped out due to the reduced perceptibility of the proposal at this distance;
- the Southwest Islay LLA, where the ZTV indicates theoretical visibility along northwest coastline located over 30km from the proposal. Scoped out due to significant effects considered unlikely;
- the South and East Islay LLA, where the ZTV indicates theoretical visibility on higher ground between 35-40km from the proposal, but not the coastline. Scoped out as significant effects are considered unlikely;
- the Knapdale/Melfort LLA, where the ZTV indicates theoretical visibility from the northern part of the LLA, at over 50km from the proposal. Scoped out as significant effects are considered unlikely;
- the Jura, Scarba, Lunga and the Garvellachs WLA which is predominantly over 30km from the proposal. Scoped out as significant effects on wild land attributes and qualities are not anticipated. The key qualities and attributes of the WLA have been used to inform the assessment of effects for the SLQs of the Jura NSA;
- the Ben More, Mull WLA is located at over 40km from the proposal. Theoretical visibility has been assessed as limited to the higher ground and as such has been scoped out as significant effects on wild land attributes and qualities are not anticipated. The key qualities and attributes of the WLA have been used to inform the assessment of effects for the SLQs of the Loch na Keal NSA.

Jura NSA

The Jura NSA is located approximately 25km southeast of the proposal at its closest point and includes the southern half of Jura. Figure 16.2.1 in Appendix 16.2 illustrates the blade tip and hub height visibility of the proposal from within the NSA. Areas within the NSA, from where turbines would be theoretically visible, range

in distance from 26km to 40km. The ZTV pattern reflects the underlying topography of the NSA, with the visibility primarily associated with elevated ground, western coastal areas and southern summits.

Viewpoints 10 (Loch Tarbert, Jura) and 11 (Beinn an Òir, Jura) are located within the NSA. Wirelines are provided in Appendix 16.4, (Figures 16.2.10a-d and 16.2.1a-e respectively). Viewpoint 10 is located approximately 34km from the proposal and is representative of views from the west coast of Jura towards Islay and Colonsay. Viewpoint 11 is located approximately 33km from the proposal and represents views experienced from the highest summit of the Paps of Jura.

An assessment of the effects on the Special Landscape Qualities (SLQs) of the Jura NSA is included within Appendix 16.2 It identifies five of the NSA's eight SLQs as having some potential to be affected by the proposal and assesses in detail. These SLQs include:

- *The distinctive Paps of Jura;*
- *A continually varying coast;*
- *Large tracts of wild land;*
- *An Island close yet remote; and*
- *The inaccessible Loch Tarbert.*

The remaining three SLQs are assessed as not experiencing significant effects:

- *Human settlement on the margins;*
- *The raised beaches of the west coast; and*
- *An Island of deer.*

The assessment states that the SLQs primarily relate to the physical and perceptual characteristics of the landscape. Effects are predicted to arise from the introduction of the proposed turbines and associated aviation lighting into views experienced from parts of the NSA, particularly the northwestern coastline and southern summits, with limited to no visibility from eastern areas.

The assessment concludes that the effects on the SLQs *The distinctive Paps of Jura*, *Large tracts of wild land* and *The inaccessible Loch Tarbert* would be significant and moderate, with *A continually varying coast* and *An island close yet remote* determined to be not significant and minor.

On review, for the SLQ *The distinctive Paps of Jura*, the assessment conclusion appears conservative. While the proposal would not affect the physical characteristics of the Paps, or their status as prominent landmarks, the assessment acknowledges that it would influence the *unparalleled views to the Inner Hebrides, the Mull of Kintyre and beyond* which form an integral component of the SLQ. Viewpoint 11 demonstrates that the proposal would occupy a notable portion of the northwest horizon and become a noticeable new feature within outward views from the summits of the Paps. Given the importance of the experience of the panoramic views, we consider a medium magnitude of impact and **moderate** and **significant** of effect within the SLVIA to be underestimated and a high magnitude of impact and a **major** and **significant** effect would be appropriate.

For the *An island close yet remote* SLQ, whilst the proposal would not affect the physical remoteness of Jura, it would influence perceptions of remoteness through the introduction of large-scale offshore infrastructure into views currently characterised by a strong relationship between the island and a largely undeveloped seascape. As remoteness is a fundamental component of this SLQ, we consider that the low magnitude of

impact and minor (not significant) effect identified within the SLVIA is an underestimate and a medium magnitude of impact, resulting in a **moderate** and **significant** effect, would be appropriate.

Loch Na Keal, Isle of Mull NSA

The Loch Na Keal NSA is located approximately 31km northeast of the proposal at its closest point. Figure A16.2.2 in appendix 16.2, illustrates the blade tip and hub height visibility of the proposal from within the NSA. Areas within the NSA, from where turbines would be theoretically visible, range in distance from 31km to 53km. The ZTV pattern reflects the underlying topography of the NSA, with the visibility primarily associated with elevated ground, notably the summit of Ben More; and southern coastal areas of Mull, Ulva Staffa, Gometra and the Treshnish Isles.

Viewpoints 24 (Staffa), 25 (Ulva), 26 (B8085 Mull), 27 (Ben More, Mull) and 28 (Cruachan Treshnish Cairn, Mull) are located within the NSA. Wirelines within the NSA are included in Appendix 16.4, (Figures 16.2.24a-c, 16.2.25a-d, 16.2.26a-d, 16.2.27a-d and 16.2.28a-d respectively).

Viewpoint 24 is located approximately 36km from the proposal and is representative of views experienced by visitors to the island. Viewpoint 25 is located approximately 44km from the proposal and represents views from the footpath network on the southern side of Ulva. Viewpoint 26 is located approximately 47km from the proposal and is representative of views experienced by road users. Viewpoint 27 is located approximately 45km from the proposal and represents views from the summit of Ben More, while Viewpoint 28 is located approximately 49km from the proposal and is representative of views experienced by recreational receptors elsewhere within the NSA.

An assessment of the effects on the Special Landscape Qualities (SLQs) of the Loch Na Keal NSA is included within Appendix 16.2. It identifies five of the NSA's nine SLQs as having some potential to be affected by the proposal and assesses in detail. These SLQs 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; and*
- *World famous Staffa and Fingal's Cave.*

The SLQs that have been determined would not have significant effects include:

- *Dramatic coast of basalt terraces and cliffs;*
- *Islands and islet groups of astonishingly varied character;*
- *The horizontal Treshnish Isles; and*
- *The instantly recognisable Dutchman's Cap*

The assessment concludes that the effects on all the scoped in SLQs would be minor and not significant.

On review, the SLQ *A voyage from enclosed sea loch to the open Atlantic*, the assessment of a low magnitude of impact and minor significance of effect appears conservative given that the proposal would be experienced during the voyage that defines this SLQ. Although the development would be viewed at considerable distance, the introduction of a large-scale offshore wind farm into seaward views has the potential to alter the perception of openness that contributes to the transition from enclosed sea loch to open Atlantic. We consider that a medium magnitude of impact and **moderate** and **significant** effect would be appropriate.

For the SLQ *Views of an island studded seascape*, the assessment concludes a low magnitude of impact resulting in a minor significance of effect. On review, this judgement appears conservative. Whilst the proposal would not directly affect the physical characteristics that underpin the SLQ, including the islands or coastline it would introduce a large-scale man-made feature into views across the seascape. The primary focus of this SLQ is not only the physical presence of the islands, but also the experience of the *island studded seascape*. ZTV mapping indicates that receptors travelling through the seascape would experience clear views of the proposal, while receptors on land would experience visibility from elevated locations within the NSA. Although the proposal would generally be viewed at considerable distance and may be partially screened from some locations, it would nonetheless alter the visual character of the seascape and the way in which this SLQ is experienced. On this basis, a medium magnitude of impact would be appropriate, resulting in a **moderate** and **significant** effect.

For the SLQ, *World famous Staffa and Fingal's Cave*, the assessment of a low magnitude of impact resulting in a minor significance appears conservative. While the proposal would not affect the physical or wildlife characteristics of the SLQ, the assessment acknowledges that it would influence the perception of Staffa as an *isolated* and *remote* island and affect the *wide and grand vista across the sea*, particularly in views towards the *Ross of Mull, Iona and Dun I*. These qualities form an important part of the *all-round* visitor experience described in the NSA citation. A new man-made feature would be introduced to these outward views southwest and has the potential to influence more the appreciation of the island's remoteness and seascape setting. The absence of a photomontage for Viewpoint 24 (Staffa) makes it difficult to fully verify the assessments conclusion regarding the scale of change from this location. However, we consider it likely that a medium magnitude of impact and **moderate** and **significant** effect would be appropriate.

For the SLQ, *A vast natural world, dwarfing human settlement*, the assessment of a low magnitude of impact appears conservative. While the proposal would not affect the physical characteristics of the landscape, the assessment acknowledges it would detract from the perception that nature dominates the area apparently mostly unaffected by humans. This is closely aligned with several of the key attributes of the Ben More, Mull WLA, including *high sense of remoteness*, *high sense of naturalness* and *sense of awe*. Viewpoint 27 (Ben More, Mull), illustrates that, despite the distance, the proposal would remain a highly perceptible and large-scale manmade feature on the horizon. Considering the importance of perceptual qualities to both the SLQ and WLA attributes, we consider a medium magnitude of impact, resulting in a **moderate** and **significant** effect to be appropriate.

Scarba, Lunga and the Garvellachs NSA

The Scarba, Lunga and the Garvellachs NSA is located approximately 41km northeast of the proposal at its closest point. Figure A16.2.3 in appendix 16.2, illustrates the blade tip and hub height visibility of the proposal from within the NSA. Areas of theoretically visibility are reported to occur at distances ranging from 41km to 51km. The ZTV pattern reflects the underlying topography of the NSA, with the visibility primarily associated with the western coastline and elevated ground.

Viewpoints 18 (Scarba) is located within the NSA. Wirelines within the NSA are presented in Appendix 16.4 (Figures 16.2.18a-c) Viewpoints 17 (Oban-Colonsay Ferry) and 19 (Cnoc Dhomnuill, Luing) were also used to inform the assessment but sit outside the NSA boundary. Wirelines for these viewpoints are in 16.2.17a-d and 16.2.19a-d respectively. Viewpoint 17 is located approximately 38km from the proposal at its closest point recreational and transport (ferry passengers). Viewpoint 18 is located approximately 47km from the proposal and is representative of views experienced by recreational receptors exercising access rights within the NSA. Viewpoint 19 is located approximately 54km from the proposal and represents views experienced by recreational receptors at a summit location.

An assessment of effects on the Special Landscape Qualities (SLQs) of the Scarba, Lunga and the Garvellachs NSA is provided in Appendix 16.2. The assessment identifies two of the NSA's nine SLQs as having the potential to be affected by the proposal and assesses these in detail. These comprise:

- *Uninhabited, remote, wild islands; and*
- *A seascape of distinctive and contrasting island groups*

The SLQs that have been determined would not have significant effects include:

- *Solitude, sanctuary, reflection and retreat;*
- *Exceptional marine life;*
- *The notorious Corryvreckan and the Grey Dogs;*
- *The pyramidal island of Scarba;*
- *The irregularly-shaped Lunga, and its attendant islands and reefs; and*
- *The low-lying slate island of Belnahua.*
- *The sloping and rocky Garvellachs*

The assessment concludes that the effects on all the scoped in SLQs would be minor and not significant.

For the SLQ *Uninhabited, Remote, Wild Islands*, the assessment's conclusion of a low magnitude of impact appears conservative. Although the proposal would not alter the physical characteristics of the islands, it would affect the way in which they are experienced and appreciated. Viewpoint 19 (Cnoc Dhomnuill Luing) demonstrates that the proposed turbines would form a notable backdrop in outward-facing sea views, introducing a substantial human-made influence into a landscape valued for its remoteness and wild character. Given that these perceptual qualities are central to the SLQ, a medium magnitude of impact may be more appropriate, resulting in a **moderate** and **significant** effect.

North and West Islay (Coast) LLA

The North and West Islay (Coast) LLA is located approximately 15km southeast of the proposal at its closest point. As no published statement of special qualities has been produced by Argyll and Bute Council, the SLVIA uses the key characteristics of the Landscape Character Types (LCTs) for defining the areas valued qualities. These include LCT 41: Plateau Moorland, LCT 42: Rocky Moorland, LCT 48: Lowland Bog and Moor, LCT 49: Island Mixed Farmland and LCT 58: Sand Dunes and Machair. LCT 48 mostly lies outside the LLA.

The viewpoints located within the LLA include Viewpoint 1 (Ardnave Point, Islay), Viewpoint 2 (Saligo Bay, Islay), Viewpoint 4 (Creag Bealach na Caillich, Islay) and Viewpoint 5 (Minor Road nr Porthaven, Islay). Corresponding wirelines are presented in Appendix 16.4 (Figures 16.2.1a-f, 16.2.2a-f, 16.2.4a-f and 16.2.5a-g).

The SLVIA concludes that there would be no direct effects on the LLA, as the proposal would be located approximately 15km and 30km from the designation boundary in offshore waters, with effects limited to changes in views and the resulting influence on the *perceptual characteristics of the landscape*.

The SLVIA identifies significant effects, (up to **major**), are predicted to arise from the introduction of the proposed wind turbines and associated aviation lighting. The assessment notes potential impacts on qualities associated with the remoteness and wildness characteristic of the landscape, making note of the relationship between the rugged coastline and the open sea. Effects are also identified in relation to the rural character of the inland landscape and its historic qualities.

We would agree with the judgements made in the assessment and the overall significance of up to **major**. The proposal would be visible for the majority of the LLA, with some small, isolated areas completely screened by the topography. The conclusions for magnitude also generally appear accurate for the LCTs.

Central, South and West Mull LLA

The Central, South and West Mull LLA is located approximately 20km northeast of the proposal at its closest point. The designation adjoins the Loch na Keal, Mull NSA and encompasses part of the Ben More, Mull WLA. The SLVIA uses the key characteristics of the Landscape Character Types (LCTs) for defining the areas valued qualities. The LCTs include LCT 35: Rugged Mountains, LCT 44: Boulder Moors – Argyll, LCT 45: Stepped Cliffs and Terraces, LCT 49: Island Mixed Farmland and LCT 50: Stepped Rocky Coastlands.

Viewpoints located within the LLA include Viewpoint 20 (Erraid, Mull), Viewpoint 21 (Mull-Iona Ferry), Viewpoint 22 (Dun I, Iona) and Viewpoint 23 (Carsaig Bay, Mull). In addition, viewpoint wirelines within the NSA are included in Appendix 16.4, (Figures 16.2.20a-d, 16.2.21a-g, 16.2.22a-d and 16.2.23a-d respectively).

The SLVIA concludes that there would be no direct effects on the LLA, as the proposal would be located approximately 20km and 50km outside the designation boundary in offshore waters, with effects limited to changes in views and the resulting influence on the *perceptual characteristics of the landscape*.

The assessment identifies significant effects (up to **major**) are predicted to arise from the introduction of the proposed wind turbines and associated aviation lighting. These effects are primarily associated with changes to views seaward and resulting effects on qualities of *remoteness and wildness* that are characteristic of the landscape. The assessment also notes a perceived contrast between the proposed development and *the low-lying rocky coast and offshore islands* and the *predominantly rural nature of the landscape and its historic character*. Significant effects are predicted to *occur within approximately 20-30km* of the proposal.

Overall, we agree with the assessment's conclusions regarding the magnitude of impact and the overall significance of effects, which are assessed as up to **major**.

Jura LLA

The Jura LLA is located approximately 30km to the east of the proposal at its closest point. The designation encompasses the northern part of Jura, adjoining the Jura NSA to the south and including parts of the Jura, Scarba, Lunga and Garvellachs WLA. As no published statement of special qualities has been produced by Argyll and Bute Council, the SLVIA uses the key characteristics of the Landscape Character Types (LCTs) for defining the area's valued qualities. These include LCT 41: Plateau Moorland – Argyll and LCT 55: Coastal Parallel Ridges.

Viewpoint 12 (An Cruachan, north Jura) is the only viewpoint located within the LLA and is supported by photomontages and wireline visualisations presented within Appendix 16.4 (Figures 16.2.12a-d).

The SLVIA concludes that there would be no direct effects on the LLA, as the proposal would be located approximately 30km and 50km outside the designation boundary in offshore waters, with effects on the LLA limited to changes in views and the resulting influence on the *perceptual characteristics of the landscape*.

The SLVIA concludes that effects on the assumed qualities of the LLA would not be significant and would be of no more than minor significance. It identifies potential effects arising from the introduction of the proposed turbines and associated aviation lighting, particularly in relation to qualities of *remoteness and wildness* that contribute to the character of the landscape. The assessment mentions that these effects would largely be experienced in views out towards the sea, beyond or alongside the Isle of Colonsay, between approximately 30-47km away.

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The SLVIA further notes that visibility of the proposal would be partially screened by Colonsay and that while the turbines would introduce a new man-made element that contrasts with the low-lying and rugged character of the landscape, key views towards the Jura NSA in the south, that includes the Paps of Jura, and east towards the sound of Jura would remain unaffected.

Overall, we agree with the assessment's conclusions regarding the magnitude of impact and the overall significance of effects, which are assessed as *minor, not significant*. Given the distance of the proposal from the LLA, the screening influence of Colonsay and the limited extent of visibility identified within the ZTV, the conclusion appears reasonable.

■ Visual effects

Viewpoint Assessment

The SLVIA assesses 30 viewpoints spread across an area up to 60km from the WDA and predicts either Moderate or Major **significant** effects at 16 viewpoints. The viewpoints assessed in the SLVIA are considered in broad island area groupings and the following text examines those viewpoints where the SLVIA predicts **significant** effects and those for which we consider the SLVIA to underestimate the significance of visual effects.

Islay

Islay is located between 15km and 48km to the northwest of the WDA. Theoretical visibility of the Machair turbines on Islay extends across all the northern coastline and inland on north facing slopes and from much of the west facing coastline and west facing slopes inland. Theoretical visibility is also shown across parts of the settlements of Bridgend, Bowmore, Saligo, Kilchoman and Portnahaven.

Eight viewpoints were assessed on Islay in the SLVIA, and **significant** effects during the day and at night were predicted at six of these. Not significant effects are predicted for the other two viewpoints on Islay: Viewpoints 6: Bowmore and 8: The Oa. **Significant** visual effect is also predicted from Viewpoint 9: Colonsay-Port Askaig Ferry.

Viewpoint 1: Ardnave Point, Islay (Figure 16.2.1 of Appendix 16.4)

This viewpoint is representative of views experienced by recreational receptors visiting Ardnave Point, a low-lying peninsula on the northwest coast of Islay with a remote circular walk (Core Paths C054 and C511) which offers views across rough pasture and machair to Loch Gruinart nature reserve and the outlying Nave Island. The viewpoint is in the North & West Islay (Coast) LLA. The walk is known for its wildlife, views and the lack of development is an important feature of the landscape. The ZTV shows that views to turbines would be gained from most of the Ardnave circular walk.

Figure 16.2.1 shows the proposed turbines on the offshore horizon to the northwest beyond Nave Island 16km away against the skyline, appearing as a large-scale offshore array with some slightly denser clusters. Some of the turbine bases will be screened by the landform of Nave Island with their hubs and tips appearing above the island. Due to their proximity, the movement of the turbines and the contrast with the introduction of large-scale vertical infrastructure elements, the development would be extremely prominent from this remote site and dominate views to the northwest.

The SLVIA assesses the receptor sensitivity to be high, magnitude of impact high, and significance during operation as **major** and **significant**.

Viewpoint 2: Saligo Bay, Islay (Figure 16.2.2 of Appendix 16.4)

This viewpoint is representative of recreational receptors visiting the beach at Machir Bay. The viewpoint lies close to sea level and is within the North & West Islay (Coast) LLA. Similar views would also be obtained from most of the coastal edge of the Rinns of Islay, an area where the lack of development is an important feature of the landscape. The ZTV shows theoretical visibility of the development along virtually all the coastline in this area.

Figure 16.2.2 shows the proposed turbines spread across the offshore horizon to the northwest 18km away, seen against the skyline and perceived as one large-scale windfarm. A few of the turbines to the east of the WDA are screened by the rocky hills of Cnoc Uamh nam Fear which lie further to the north. This gives the illusion that the development lies adjacent to the shores of Islay. Despite the distance of the turbines, the size

and the movement of the turbines and the perception of its apparent proximity to the Islay landscape, would mean that the development would be extremely noticeable in good weather conditions.

The SLVIA finds receptor sensitivity to be high, magnitude of impact high, and significance during operation as **major** and **significant**.

Viewpoint 3: Kilchoman, Islay (Figure 16.2.3 of Appendix 16.4)

The view is representative of views experienced by visitors to the Kilchoman Distillery. This viewpoint is located inland to the south of Loch Gorm at the junction of the distillery entrance and the minor road between Loch Indaal and Kilchoman. Similar views would be available from scattered properties in the vicinity. The ZTV shows widespread theoretical visibility to the development's turbines across this inland area.

Figure 16.2.3 shows the proposed turbines to the northwest at 20km away, seen against the skyline, behind the moorland to the east of Loch Gorm. The central part of the wind farm would be visible with the outer turbines to the east and west obscured by the rocky coastal landform. The view gives the illusion of being an onshore wind farm as the sea is not visible from this viewpoint and the size of the turbines would suggest that they are relatively close. The size and the movement of the turbines would mean that the vertical structures would be a focal point within this mostly horizontal landscape.

The SLVIA finds receptor sensitivity to be medium, magnitude of impact high, and significance during operation as **major** and **significant**.

We disagree with the SLVIA where it finds receptor sensitivity as medium (for visitors). The ES states that the viewpoint is also representative for residents and thus should be given a high sensitivity, however this would not change the significance during operation.

Viewpoint 4: Creag Bealach na Caillich, Islay (Figure 16.2.4 of Appendix 16.4)

This viewpoint is representative of recreational receptors visiting the west coast of Islay, on a coastal route between Kilchiaran and Kilchoman (Core Path C056) which offers views across rough pasture and dunes to the beach at Machir Bay. The viewpoint is at an elevated location next to a wireless station and is within the North & West Islay (Coast) LLA. The walk is known for its unspoilt coastal views, and the lack of development is an important feature of the landscape. The ZTV shows that the turbines would be visible from the coastal section of the route.

Figure 16.2.4 shows the proposed turbines on the offshore horizon to the northwest 22km away against the skyline, beyond the peninsula of Coul Point, appearing as a large-scale offshore windfarm with a few slightly denser clusters. Despite the distance of the turbines, the size and the movement of the turbines and the contrast of the large-scale infrastructure with the undeveloped nature of the landscape, would mean that the development would be extremely noticeable and dominate views.

The ES finds receptor sensitivity to be high, magnitude of impact high, and significance during operation as **major** and **significant**.

Viewpoint 5: Minor Rd near Portnahaven, Islay (Figure 16.2.5 of Appendix 16.4)

This viewpoint is representative of users of the local road close to the settlement of Portnahaven. The view is elevated and is part of a core path route forming a loop between Portnahaven and Octofad (Core Paths C057, C512 and C058). The viewpoint is in the North & West Islay (Coast) LLA. The walk is known for its remote qualities, and the lack of development is an important feature of the landscape. The ZTV shows that turbines would be visible from sections of the route close to Portnahaven.

Figure 16.2.5 shows the proposed turbines on the offshore horizon to the northwest 27km away against the skyline, appearing as a large-scale offshore array with some slightly denser clusters. The turbines appear at this viewpoint to be located close to Lossit Point on Islay which lies further to the north. Despite the distance of the turbines, the size and the movement of the turbines and the perception of its apparent proximity to the Islay landscape, would mean that the development would be extremely noticeable in good weather conditions.

The SLVIA finds receptor sensitivity to be medium, the magnitude of impact high, and significance during operation as **major** and **significant**.

We disagree with the SLVIA where it finds receptor susceptibility as low for transport receptors and thus overall sensitivity as medium. The viewpoint is on a Core Path and in an LLA and receptors include walkers with a high susceptibility which would result in high sensitivity; however, this would not change the significance during operation. The settlement assessment also mentions this viewpoint as being provided to represent residents in Portnahaven, but residential receptors are not included in the Viewpoint 5 assessment table.

Viewpoint 7: Beinn Bheigier, Islay (Figure 16.2.7 of Appendix 16.4)

This viewpoint is representative of recreational receptors visiting the summit of Beinn Bheigier, the highest point on Islay (491m AOD). It is covered by South and East Islay LLA. Views from this location are long distance and panoramic across the island out to the open sea. To the northwest, the landform descends steeply across moorland and pasture lower down with Loch Indaal visible. No wind farm development is currently visible in any direction from the viewpoint.

Figure 16.2.7 shows the proposed wind farm seen on the horizon of the open sea to the northwest 39km away, seen beyond Islay as one large scale offshore windfarm framed from the viewpoint by the landform of the hill. Contrary to the ES text, the figure shows the lower parts of the turbines against the sea with hubs and blades seen against the sky, and the elevation of the viewpoint showing the depth of field of the large array. Despite the considerable distance to the development, due to their large scale the turbines would be individually visible, and their movement would increase attention. No large-scale development is currently seen from any direction, and the addition of the development compromises the remote undeveloped nature of this location.

The ES finds receptor sensitivity to be high, magnitude of impact medium, and significance during operation as **moderate** and **significant**.

Viewpoint 9: Colonsay to Port Askaig Ferry (Figure 16.2.9 of Appendix 16.4)

This viewpoint is representative of recreational receptors travelling on the ferry between Islay and Colonsay. The view is long distance and expansive across the open Atlantic. The landform of Oronsay is apparent to the north with Nave Island off the coast of Islay just visible to the south. The ZTV shows theoretical visibility across the route of the ferry once it has left the Sound of Islay and similar views will occur during most of the route, as it crosses open water.

Figure 16.2.9 shows the proposed turbines on the horizon of the open sea to the west 24km away, appearing as one windfarm that stretches approximately three quarters of the distance between Nave Island and the southern tip of Oronsay. The turbine hubs and blades would be seen against the sky, and their movement would be apparent.

The SLVIA finds receptor sensitivity to be medium, the magnitude of impact medium, and significance during operation as **moderate** and **significant**.

The SLVIA does not mention people on recreational vessels as visual receptors, but this viewpoint would also represent views for them. These receptors would be likely to have a high sensitivity to the development. In views to the development from this location, the wide spread of the wind farm turbines appears to 'block' the view to the open sea giving an impression of hemming in the passage between Oronsay and Islay and introducing large scale development to a previously undeveloped seascape. In our view due to these factors the development would result in a high magnitude of change resulting in a **major** and **significant** effect.

Jura

Jura is between approximately 27km and 52km to the south-east of the WDA. Theoretical visibility of the Machair turbines on Jura is difficult to assess fully as detailed ZTVs are only provided for the areas around the viewpoints and do not cover the whole of the island. Visibility is likely to extend across much of the western coastline and inland on west facing slopes and summits.

Three viewpoints were assessed on Jura in the SLVIA, and **significant** effects during the day are predicted at two of these. The visual effect at Viewpoint 12: An Cruachan at the northern point on Jura, is assessed as not significant.

The SLVIA predicts **significant** visual effects for the following viewpoints:

Viewpoint 10: Loch Tarbert, Jura (Figure 16.2.10 of Appendix 16.4)

This viewpoint is representative of recreational receptors visiting the remote southern shore of Loch Tarbert. It is located within the Jura NSA and WLA 5 Jura, Scarba Lunga and Garvellachs. The view looks west over the open waters of Loch Tarbert and rocky islets to the open sea and is framed by the northern shoulder of Scrinadle and rocky headlands of the mouth of Loch Tarbert. Oronsay and Colonsay are visible in the distance. The ZTV shows theoretical visibility across the coastline and further inland on west facing slopes.

Figure 16.2.10 shows the proposed turbines on the horizon of the open sea to the southwest 34km away, appearing as one windfarm that stretches the whole way across the sea view. The turbine hubs and blades would be seen against the sky, and their movement would be apparent.

The SLVIA finds receptor sensitivity to be high, magnitude of impact medium, and significance during operation as **moderate** and **significant**.

In views to the proposal from this location, the wide spread of the wind farm turbines appear to 'block' the view to the open sea giving an impression of hemming in the entrance to Loch Tarbert and introduces large scale development to a remote and undeveloped seascape. In our view despite the considerable distance to the turbines, these factors would result in a high magnitude of change resulting in a **major** and **significant** effect.

Viewpoint 11: Beinn an Oir, Jura (Figure 16.2.11 of Appendix 16.4)

This elevated panoramic viewpoint is representative of recreational receptors visiting the summit of Beinn an Oir (AOD 785m), a Corbett and the highest summit of the Paps of Jura, a series of three summits which are a landmark on the west coast of Scotland. The viewpoint is located within the Jura NSA and WLA 5 Jura, Scarba Lunga and Garvellachs. Views from this location are long distance and panoramic out to the open sea across the hills of Jura with Islay, Colonsay and Oronsay visible to the west and northwest beyond. The ZTV shows visibility across the summit and on west facing slopes of Jura. Operational windfarms on Kintyre are visible from this panoramic viewpoint in views to the south over 60km away.

Figure 16.2.11 shows the proposed wind farm seen on the horizon of the open sea to the west 39km away, viewed beyond Islay and Oronsay as one large scale offshore windfarm. Contrary to the SLVIA text, the figure shows the hubs of the turbines would be seen against the sea with blades seen against the sky, with the

elevation of the viewpoint revealing the depth of field of the large array. Despite the considerable distance to the development, due to their large scale the turbines would be individually visible, and their movement would attract attention. The spread of the development would be apparent from this viewpoint with the area occupied by turbines taking up a wider angle of view than the island of Colonsay. This contrast would highlight the discrepancy in scale between the remote smaller islands and the expanse of the WDA. Although wind development on Kintyre is currently visible from the Paps of Jura their smaller height does not compromise the remote undeveloped nature of this location in the same way as Machair would.

The SLVIA finds receptor sensitivity to be high, magnitude of impact medium, and significance during operation as **moderate** and **significant**.

We consider that despite the considerable distance to the turbines, their extensive spread and the introduction of large-scale development to a remote and previously undeveloped seascape, would result in a high magnitude of change resulting in a **major** and **significant** effect.

Colonsay and Oronsay

Colonsay and Oronsay are located between approximately 12km and 21km to the east of the WDA. **Significant** visual effects during the day and at night are predicted in the SLVIA on both islands, from west-facing coastlines, but also inland from west facing slopes and hill summits, as well as areas of north and south-facing coastline along the Strand.

On Colonsay receptors that will experience significant effects include residential receptors at Lower and Upper Kilchattan and Uragaig close to Kiloran Bay, recreational receptors on the west coast including high points inland and beaches, core paths and road users of the B-road network.

Significant effects are predicted for visitors to Oronsay Priory and walkers on the main route to and across Oronsay; Core Path C045.

Significant effects on visual amenity are predicted at all four viewpoints on Colonsay and Oronsay assessed in the SLVIA, both during the day and at night:

Viewpoint 13: Oronsay Priory, Oronsay (Figure 16.2.13 of Appendix 16.4)

This viewpoint is representative of recreational receptors visiting the Oronsay Priory, a scheduled ancient monument, and is the only viewpoint included in the SLVIA from Oronsay. Oronsay is a relatively flat low island with open views across rough pasture and machair. The island is accessed via Core Path C045 which crosses 'The Strand', a stretch of sandy tidal flats accessible at low tide linking Oronsay to Colonsay. Oronsay is celebrated for its remote qualities, and its undeveloped nature is an important feature of the landscape character. The ZTV shows that turbines would be visible from much of Oronsay and The Strand, with the Priory and Oronsay Farm the only built vertical elements on the island that would provide only very localised screening.

Figure 16.2.13 shows the proposed turbines on the offshore horizon to the west 14km away against the skyline, appearing as a large-scale offshore windfarm with some slightly denser clusters. Due to their proximity, the turbines would be extremely prominent from this remote and singular site and dominate views to the west across much of the island. The turbines' very large scale is emphasised by the contrast with the modest scale of Oronsay Farm buildings and the Priory.

The ES finds receptor sensitivity to be high, magnitude of impact high, and significance during operation as **major** and **significant**. The setting of the Priory is also assessed in the Cultural Heritage chapter of the EIAR where the effect it is assessed to be of low adverse magnitude.

Viewpoint 14: B8086 south of Lower Kilchattan, Colonsay (Figure 16.2.14 of Appendix 16.4)

This viewpoint is representative of road users on the B8086 and is located to the south of Lower Kilchattan. The SLVIA states it is also representative of residents in properties to the north of the viewpoint in Upper and Lower Kilchattan. The long-distance view looks across a rocky coastal edge out across the open sea. The ZTV shows that most of the properties of upper and Lower Kilchattan have theoretical visibility to the turbines as does approximately 4km of the B8086.

Figure 16.2.14 shows the proposed turbines seen on the offshore horizon to the west 14km away against the skyline, appearing as one large scale offshore windfarm across the horizon, occupying most of the open sea visible from this location. The turbines would dominate views from this location adding contrasting large scale vertical infrastructure elements to a current undeveloped landscape, with the blades' movement making them more conspicuous within views.

The ES finds receptor sensitivity to be medium, magnitude of impact high, and significance during operation as **major** and **significant**.

We do not agree with the assessment of sensitivity for this viewpoint which, as representative of views experienced by residents, should be high. The ZTV shows widespread theoretical visibility for residents. We consider that more importance should be placed on views from residential properties, and a suitable viewpoint from within Kilchattan should have been assessed.

Viewpoint 15: Uragaig, Colonsay (Figure 16.2.15 of Appendix 16.4)

The viewpoint is located on a minor road to the west of the settlement of Uragaig. The SLVIA states that it is representative for residents and recreational receptors in the area. The elevated view looks west over rough grassland to the sea with the view framed either side by rising coastal landform. No wind farm development is currently visible from the viewpoint. The ZTV shows that several properties at Uragaig would have theoretical visibility to the turbines as would the northern part of the beach at Kiloran Bay.

Figure 16.2.15 shows the proposed wind farm on the horizon of the open sea to the west at 17km away, seen against the skyline. The central part of the wind farm would be visible with the outer turbines to the south and north obscured by the coastal landform. The view of the turbines stretching across all the visible seascape gives a feeling of enclosure. The framing effect and the movement of the turbines would mean that the turbines would be a focal point within this coastal landscape.

The SLVIA finds receptor sensitivity to be high, magnitude of impact medium and significance during operation as **moderate** and **significant**.

We disagree with the SLVIA assessment of medium magnitude and consider the magnitude of impact to be high, due to the landform funnelling views towards the turbines causing them to be a focal point and their relative proximity, which would result in a **major** and **significant** effect. Additionally, a viewpoint located at a higher elevation closer to the properties at Uragaig might be preferable to be fully representative for residents.

Viewpoint 16: Summit of Beinn nan Gudairean, Colonsay (Figure 16.2.16 of Appendix 16.4)

This viewpoint is representative of recreational receptors visiting the summit of Beinn nan Gudairean, the highest point on Colonsay (136m AOD). Views from this location are long distance and panoramic across the island out to the open sea. No wind farm development is currently visible in any direction from this viewpoint. To the west, a ridge of the hill partially screens the offshore horizon, with views beyond Beinn nan Gudairean across Loch Fada which is surrounded by pasture and buildings of Upper and Lower Kilchattan. The ZTV

shows that virtually all the hill summits and west facing slopes on Colonsay would have theoretical visibility to the turbines.

Figure 16.2.16 shows the proposed wind farm in the west on the horizon of the open sea at 17km beyond Colonsay, seen as one large scale offshore windfarm. The crest of a ridge partially screens some of the turbine bases, but all the turbines are visible with hubs and blades seen against the sky. Even at 17km away the contrast in scale between the housing of Upper and Lower Kilchattan and the considerable height of the turbines is notable, with the elevation of the viewpoint showing the depth of field of the large array. The turbines would be individually visible, and their movement would be noticeable. No large-scale development is currently visible in any direction, and the addition of the proposal would compromise the sense of remoteness experienced on Beinn nan Gudairean.

The SLVIA finds receptor sensitivity to be medium, magnitude of impact high and significance during operation as **moderate** and **significant**.

We consider the addition of the development compromises the remote unspoilt nature of the Beinn nan Gudairean viewpoint and would evaluate walkers to the summit to experience the panoramic viewpoint as being of high sensitivity. These factors would result in a **major** and **significant** effect.

Scarba and Luing

Scarba and Luing are between approximately 45km and 55km to the northeast of the WDA. Theoretical visibility of the Machair turbines is difficult to assess fully as detailed ZTVs are only provided for the areas around the viewpoints and individual islands and do not cover the whole area. Visibility extends across much of the western coastline and predominantly on the higher points inland.

Three viewpoints were assessed within the Scarba and Luing area in the SLVIA and were all assessed as not significant. The assessment of effects on visual amenity for which we consider may be **significant** are discussed below:

Viewpoint 18 Scarba (Figure 16.2.18 of Appendix 16.4)

This viewpoint is representative of recreational receptors exercising their right to roam, visiting the highest point on Scarba (449m AOD) and is located within the Scarba, Lunga and Garvellachs NSA and the Jura, Scarba, Lunga and Garvellachs WLA. Views west are represented in Figure 16.2.18. Wirelines illustrate the long distance and open views across the Atlantic towards Colonsay and Oronsay. At present, there is a lodge and minor roads in the east of the island with the centre and west very remote in nature. The ZTV shows there would be high visibility of the scheme from the western and central part of Scarba. No wind farm development is currently visible in any direction.

Wirelines in Figure 16.2.18 show the proposed wind farm to the southwest beyond the low-lying landmass of Colonsay and Oronsay with the open Atlantic beyond and to either side. The wind farm would be approximately 47km from the viewpoint at its closest point. There would be partial screening of central wind turbines from Colonsay and Oronsay but due to the scale of the development the majority would be visible to the north and south of the island and with the hubs and blade apparent on the horizon.

The SLVIA finds the receptor sensitivity to be high, magnitude of impact low and the significance minor and not significant.

We consider that during good visibility the development compromises the remote and wild nature of the views from the NSA, alongside the open views across the Firth of Lorn southwest towards Colonsay and Oronsay and the Atlantic beyond. The scale of change within the geographical context of these views is

arguably medium, resulting in medium magnitude of impact, with the proposal prominent on the horizon, potentially resulting in a **moderate** and **significant** effect.

Viewpoint 19 Cnoc Dhomnuill, Luing (Figure 16.2.19) of Appendix 16.4

This viewpoint is representative of recreational receptors visiting the viewpoint of Cnoc Dhomnuill (94 AOD) in the north of the island of Luing. It is located within the Knapdale/Melfort LLA which has been scoped out of the assessment. Views west towards the proposal are represented in Figure 16.2.19 which illustrate the long-distance views across the Sound of Luing and the archipelago of small islands within the Scarba, Lunga and Garvellachs NSA in the foreground, with the open Atlantic beyond. The ZTV shows there would be high visibility of the wind turbine on the higher ground with visibility decreasing lower down on the western coastline. No wind farms are currently visible in any direction.

Figure 16.2.19 shows the proposed wind farm to the southwest on the horizon beyond the small islands in the foreground at 54km from the viewpoint. The wind farm is partially screened beyond the larger island of Garbh Eileach, with the blade and hubs mostly visible on the skyline compromising the long-distance and undeveloped views to the southwest.

The SLVIA finds the receptor sensitivity to be high, magnitude of impact low and the significance minor and not significant.

We consider that during good visibility the proposal would compromise the remote nature of the views across the Garvellachs towards the open Atlantic, and arguably the scale of change in views (across the NSA) would be medium, resulting in a medium magnitude of impact and a **moderate** and **significant** effect.

Mull, Iona, Erraid, Ulva and Staffa

Mull, Iona, Erraid, Ulva and Staffa are located between approximately 20-60 km to the north-east of the WDA. Theoretical visibility of the Machair turbines on Mull extends across the southern coastline and the south facing slopes of the western part of Mull and inland on some of the southwest facing slopes and summits of the hills and mountains, including Ben More.

Four viewpoints on the Mull mainland (23: Carsaig Bay, 26: B873, 27 Ben More and 28: Cruachan Treshnish Cairn), which are all located within the Loch na Keal NSA, are assessed in the SLVIA, and effects are not assessed to be significant. **Significant** effects are predicted at Viewpoint 20: Erraid, at the southwestern tip of Mull and the Sound of Iona Viewpoint 21: Mull – Iona Ferry.

On Iona, theoretical visibility is widespread and includes most of the southern and inhabited eastern coastline, parts of the western coastline and southwestern facing hill slopes and summits. Theoretical visibility of the turbines is indicated from the main settlement of Baile Mor and village of Sligneach on Iona. Visual effects at viewpoint 22: Dun I, Iona, the highest point of Iona in the northern part of the island are assessed as **significant**.

Viewpoints on the islands of Staffa and Ulva to the west of Mull are also included in the SLVIA; Viewpoint 24: Staffa and Viewpoint 25: Ulva, with effects assessed as not significant.

Viewpoint 20: Erraid, Mull (Figure 16.2.20 of Appendix 16.4)

This viewpoint is representative of recreational receptors visiting the high point on Erraid. It is located within the Central, South and West Mull LLA. Erraid comprises a low circular rocky island with open views in all directions. The island is accessed at low tide by foot and has a small community living on it. Erraid is known for its remote character. The ZTV shows patchy theoretical visibility across higher parts of the island.

Figure 16.2.20 shows the proposed turbines on the horizon of the open sea to the southwest 21km away, appearing against the sky as one large scale offshore windfarm with one outlier turbine outlier (no 38) to the west. The SLVIA states that views of this nature would be available from much of the coastal edge to the south-west of Erraid and the Ross of Mull, and from inland areas with south-western facing slopes and thus implies this viewpoint is representative of these areas too.

The SLVIA finds receptor sensitivity to be high, magnitude of impact medium and significance of effect during operation as **moderate** and **significant**.

We consider that the introduction of a large-scale development into this remote undeveloped natural seascape would result in a high magnitude of change resulting in a **major** and **significant** effect.

Viewpoint 21: Mull – Iona Ferry (Figure 16.2.21 of Appendix 16.4)

This viewpoint is representative of recreational receptors travelling on the ferry across the Sound of Iona. Although the viewpoint represents travellers on the ferry, it is also the closest comparable visualisation presented in the ES to represent residents on the east coast of Iona at Baille Mor and Sligneach. The view is across the Sound of Iona with Iona seen to the west and Mull and associated smaller islands to the east and the open sea framed between these two land masses to the south. The ZTV shows theoretical visibility across the route of the ferry.

Figure 16.2.21 shows the proposed turbines on the horizon of the open sea to the southwest at 24km away, appearing as one windfarm that stretches the whole way across the view to the open sea, from the islands off Mull to Iona. The turbine hubs and blades would be seen against the sky, and their movement would be apparent.

The ES finds receptor sensitivity to be medium, magnitude of impact medium and significance during operation as **moderate** and **significant**.

The ES does not mention people on recreational vessels and wildlife tour boats as receptors, but this viewpoint would also represent views for them. These receptors would be likely to have a high sensitivity. In views to the development from this location, the wide spread of the wind farm turbines appears to 'block' the view to the open sea giving an impression of hemming in the Sound of Iona and introducing large scale development to a previously undeveloped seascape. In our view due to these factors the development would result in a high magnitude of change resulting in a **major** and **significant** effect. It also is likely that residents (high sensitivity) with southwest aspects at Baille Mor and Sligneach would experience similar views of the development to Viewpoint 21.

Viewpoint 22: Dun I, Iona (Figure 16.2.22 of Appendix 16.4)

This viewpoint is representative of recreational receptors walking up to the highest point on Iona. It is located within the Central, South and West Mull LLA. Dun I is a notable landmark with a cairn at the summit and panoramic elevated views across the entire island of Iona in all directions. To the south views show the island surrounded by the sea and ocean, with the only development being the housing of Baille Mor and other scattered properties on the island.

Figure 16.2.22 shows the proposed wind farm seen on the horizon of the open sea to the southwest 25km away, seen beyond the south part of Iona as one large scale offshore windfarm. The turbine hubs and blades would be seen against the sky, and their movement would be apparent.

The SLVIA finds receptor sensitivity to be high, magnitude of impact medium and significance during operation as **moderate** and **significant**.

We consider that views to the development from this location compromise the remote unspoilt nature of views from this location. No large-scale development is currently obtained from any direction from this viewpoint, and the undeveloped character would be compromised. In our view the development would result in a high magnitude of change resulting in a **major** and **significant** effect.

Viewpoint 24: Staffa (Figure 16.2.24 of Appendix 16.4)

This viewpoint is representative of recreational receptors visiting Staffa, a small uninhabited island with extraordinary rock formations to the west of Mull which is owned by the National Trust for Scotland. Trips to the island are run for visitors and include visits to Fingal's Cave and walking around the island. The viewpoint appears to be located at the entrance to Fingal's Cave (where the viewer's attention is likely focussed on the cave itself) rather than one of the more elevated points on the island, from which the wider sea views would be the focus of the viewer and wirelines only are provided.

Figure 16.2.24 shows the proposed wind farm on the horizon to the southwest at 36km away. The windfarm is seen in two parts, with landform of Iona partially screening the hubs of some of the central turbines. The Ross of Mull is seen adjacent to the east of the windfarm, with all the turbine hubs and blades viewed against the sky spaced in varying clusters. The SLVIA finds receptor sensitivity to be high, magnitude of impact low and significance during operation as minor and not significant.

We consider that views to the development from this location compromise the remote unspoilt nature of views from Staffa. No large-scale development is currently seen from any direction from the island, and this undeveloped character would be compromised. Despite the distance to the development, we consider that the very large scale of the turbines beyond Iona and the Ross of Mull would result in a medium magnitude of change from this viewpoint resulting in a **moderate** and **significant** effect.

Viewpoint 27: Ben More, Mull (Figure 16.2.27 of Appendix 16.4)

This viewpoint is representative of recreational receptors visiting the summit of the popular munro, Ben More (966 m AOD). It is covered by three landscape designations; the Loch na Keal, Isle of Mull NSA, the Mull WLA and Central, South and West Mull LLA. Views from this location are panoramic and spectacular. The immediate foreground consists of rocky upland terrain. To the south-west, the landform descends steeply across Loch Scridian and the Ross of Mull. Longer distance views extend across the sea towards Colonsay and Jura with the Paps of Jura notable landmarks on the skyline to the south. No wind farm development is currently visible from the viewpoint.

Figure 16.2.27 shows the proposed wind farm on the horizon of the open sea to the southwest 45km away, seen beyond the south part of Iona as one large scale offshore windfarm. Contrary to the SLVIA text, the figure shows turbine hubs and blades would be seen partially against the sea and partially against the sky, with the elevation of the viewpoint exposing the depth of field of the large array. The SLVIA finds receptor sensitivity to be high, magnitude of impact low and significance during operation as minor and not significant.

We consider that views to the development from this location compromise the remote unspoilt nature of this panoramic view. No large-scale development is currently seen from any direction from Ben More and the undeveloped seascape character would be compromised. Despite the considerable distance to the proposal, due to their large scale, the turbines would be individually visible, and because of the high elevation of the viewpoint, the considerable spread of the wind farm would be clearly apparent. We consider that this would result in a medium magnitude of change from this viewpoint resulting in a **moderate** and **significant** effect.

Tiree

Viewpoint 29: Hynish, Tiree (Figure 16.2.29 of Appendix 16.4)

This viewpoint is representative of residential receptors with open coastal views southwards living in the small community of Hynish in the southwest on the island of Tiree. Views look over the rocky coastline and out across the open Atlantic, giving way to expansive, uninterrupted sea views. No wind farm development is currently visible from the viewpoint. Figure 16.2.29 shows the proposed wind farm seen on the horizon of the open sea to the south 37km away at its closest point. The wind farm, in particular the blades and hubs, would be apparent against the skyline across a wide arc of view due to the uninterrupted nature of the foreground.

The ES finds receptor sensitivity to be high, magnitude of impact low and significance of effect during operation as minor not significant.

We consider that views to the proposal from this location compromise the remote unspoilt and uninterrupted nature of this expansive seascape towards the Atlantic. No large scale of development is currently visible in this direction for residents, and the remote and wild character would be affected. The distance notwithstanding, the large scale of the turbines and wide development area, would make the wind farm clearly apparent on the horizon. We consider this would result in a medium magnitude of impact resulting in a moderate **significant** effect.

Settlement Assessment

Overall, throughout the ES the residents of the affected islands who are shown to have theoretical visibility of the development have been underrepresented and sometimes ignored in the reporting. Residents on Iona at the main settlement of Baile Mor are predicted to experience **moderate** and **significant** effects, however visual effects on residents of scattered properties elsewhere on Iona are not assessed.

Residents of settlements on Islay and Colonsay showing theoretical visibility such as Portnahaven, Upper Kilchattan, Lower Kilchattan and Uragaig are assigned viewpoints which are nearby but not next to the settlements, and thus not fully representative and these residential receptors not properly assessed as would be expected under GLVIA guidance. GLVIA3 is clear that people living in the area of the proposed development should be considered as receptors (paragraph 6.13).

The SLVIA states in section 16.7.1.3.4 they have considered settlements as *'Settlements are those defined as such within the Argyll and Bute Council Local Development Plan 2 (Argyll and Bute Council 2024). Settlements across the Study Area tend to be small scale and located along the coasts of the islands. Beyond defined settlements there are many clachan-type clusters of dwellings located throughout the inhabited islands; these are represented by the viewpoints set out in Table 16.10.'*

The representation of residential receptors by viewpoints approach has not been fully undertaken and we would argue that only assessing settlements defined in the A&B LDP is an approach that disregards many of the occupants of these islands who are settled in much smaller villages and other scattered communities. For example, only one settlement on Colonsay is defined within the LDP: Scalasaig, which does not have theoretical visibility to the scheme. Upper and Lower Kilchattan and Uragaig are shown by the ZTV to experience theoretical visibility yet have not been included in the assessment.

The SLVIA (Table 16.54) appears to disregard any of the residential properties on Colonsay within which the ZTV shows visibility to the turbines. Tables 16.55-16.57 for other islands are titled *"Operational effects on settlements and routes"* whereas residents of Colonsay are represented by Table 16.54 titled *"Operational effects on routes on Colonsay and Oronsay"*.

The more detailed ZTV supplied for Iona on Figures 16.2.21 and 16.2.22 show theoretical visibility across many of the properties on the eastern side of Iona. The assessment of effects on these residents' visual

amenity is covered in a sentence by the ES Table 16.56 which states *“Baile Mor – medium magnitude of impact, resulting in a moderate and significant effect;”*. No detailed commentary of this assessment is given and no viewpoint provided from any areas of Iona's east coast settlement. The closest viewpoint supplied within the ES is the Viewpoint 21 - Mull - Iona Ferry. For residents at Baile Mor and Sligneath it is likely that properties with southwest aspects would experience similar views to Viewpoint 21 with the turbines filling the framed view of the open sea between Mull and Iona. This under-reporting of significant effects experienced by island community is a failing of the SLVIA.

In addition, two of the viewpoints which the SLVIA says represent residents have not been assigned high sensitivity, which we would expect, but rather medium sensitivity (Viewpoint 3: Kilchoman, Islay, Viewpoint 14: B8086 south of Lower Kilchattan, Colonsay). The SLVIA contradicts this approach at Viewpoint 15 and 29 where residential receptors are evaluated to be high sensitivity; *“Residential receptors at this location are considered to be of high susceptibility. The viewpoint is not located in a designated landscape though it offers scenic coastal views. Value is judged to be medium. On balance, taking account of the judgements of susceptibility and value, the overall sensitivity is judged to be high.”*

Transport Routes

Roads

The SLVIA predicts **significant** visual effects to be experienced on:

- the B8085, B8086, and B8087 on Colonsay; and
- the A846, B8016, B8017 and B8018 on Islay.

Recreational Routes

The SLVIA predicts **significant** visual effects to be experienced on the following Core Paths:

- C045, C046, C047 and C048 on Colonsay;
- C045 on Oronsay;
- C054, C055, C056, C057, C058, C056, C061, C511 and C512 on Islay, with those affected particularly in the northwest;
- C040 and C041 on Mull; and
- C483 and C484 on Iona.

Ferry Routes

The SLVIA predicts **significant** visual effects to be experienced on two ferry routes:

- Colonsay to Port Askaig (Islay) Ferry (Viewpoint 9: Colonsay – Port Askaig Ferry). The sequential assessment of the route finds the overall magnitude of impact low with receptors of medium sensitivity resulting in a **moderate** and **significant** effect; and
- Mull to Iona Ferry –this is included in the viewpoint assessment (see above) and found to have **significant** effects.

The sequential visual assessment for the Oban to Colonsay Ferry (Viewpoint 17: Oban – Colonsay Ferry) finds the overall magnitude of impact to be low with receptors of medium sensitivity resulting in a minor and not significant effect. The viewpoint is representative of recreational and transport receptors travelling on the Oban-Colonsay Ferry approximately 6km west of the Garvellachs. Views from this location are long distance and panoramic across the wide expanse of the open sea framed between the northern extent of Colonsay to the southwest and the Ross of Mull to the northwest. No wind farm development is currently visible in any direction from this viewpoint. The ZTV shows the theoretical visibility across some of the ferry route.

Figure 16.2.17 shows the proposed wind farm seen to the northwest on the horizon of open sea 38km away. The wind turbines bases are mostly screened by the sea horizon, but the hubs and blades are apparent against the skyline. A small number of turbines are visible behind the very northern tip of Colonsay. No large-scale development or human settlement is visible in these views, and the introduction of a substantial wind farm would compromise the undeveloped open sea view.

The ES finds the receptor sensitivity to medium, magnitude of impact low and significance during operation as minor and not significant.

We consider the addition of the development compromises the remote and unspoilt nature of the views towards the southwest of the open Atlantic and on the approach to Colonsay and would classify any recreational receptors (tourists) who were visiting the island with high sensitivity. We consider that the magnitude of change in views to the southwest would arguably be medium. These factors would likely result in a **moderate** and **significant** effect.

Key Recreational and Tourist / Visitor Attractions

Iona is historically an important place of Christianity and known as a quiet spiritual destination for pilgrims. St Marys Priory is central to this, but no viewpoint has been provided from this important location on the island. However, a combination of Google Streetview and the ZTV indicate that there would be visibility of the turbines adjacent to the Priory, which we consider should have been addressed in the SLVIA.

Little consideration has been given to the renowned beaches of the Hebridean islands which are an important draw to visitors to Islay, Colonsay and Iona. Theoretical visibility is indicated on many beaches including the famous Kiloran Bay in Colonsay, Port Ban and the Bay at the back of the Ocean in Iona and numerous sandy beaches on the west coast of Islay.

No mention has been given in the SLVIA to users of inshore waters for example engaged in wildlife tours, kayaking, paddle boarding, yachting and other water-based activities all of which could be expected to have high sensitivity.

■ Cumulative effects

Due to the lack of other wind farm developments, no significant additional cumulative effects on seascape, landscape or visual receptors are predicted in the ES, and we agree with this assessment.

■ Conclusions

Landscape

Overall, the Landscape Character Assessment appears to be comprehensive and generally supported by the accompanying ZTV analysis, figures and visualisations. We agree with some of the conclusions presented. However, the SLVIA appears to underestimate effects on the LCTs:

- LCT 42 (Rocky Moorland – Argyll), specifically the area south of Loch Gorm and;
- LCT 35 (Rugged Mountains), specifically the Jura units.

We consider the extent of visibility and influence of the proposal on perceptual qualities such as wildness, remoteness and the relationship with the sea to result in a higher magnitude of impact and significance of effect than those presented in the assessment.

Overall, the Coastal Character Assessment appears to be comprehensive and generally supported by the accompanying ZTV analysis, figures and visualisations. Whilst we agree with some of the conclusions, the SLVIA appears to underestimate the significance of effects on the following CCAs:

- CCA 7 - Ross of Mull;
- CCA 15 - Loch Tarbert;
- CCA 18 – Sgairail and;
- CCA 20 – Ardnave Point to Rhinns Point.

The proposal would influence key characteristics of these CCAs associated with remoteness, wildness, openness and the relationship between the coastline and the sea and we consider that the extent of visibility, scale of the proposal and influence on defining characteristics would result in a higher magnitude of impact and significance of effect.

Overall, the assessment of effects on the NSAs appears comprehensive and generally supported by evidence. However, we consider that the magnitude of impact and significance of effects on several SLQs relating to remoteness, wildness, naturalness and the relationship between the landscape and sea has been underestimated in the SLVIA. We do not agree with the conclusion that the effects on 'the remaining NSA SLQs' presented in Appendix 16.2 would be 'no greater than minor and not significant'.

- For the Jura NSA (a medium magnitude of impact and **moderate** significance for the SLQ *An island close yet remote* and a high magnitude of impact and **major** significance for the SLQ *The distinctive Paps of Jura* would be appropriate.
- For Loch na Keal, Isle of Mull NSA, a medium magnitude of impact and a **moderate** significance would be more appropriate for the SLQs *A voyage from enclosed sea loch to the open Atlantic*, *Views of an island studded seascape*, *World famous Staffa and Fingal's Cave* and *A vast natural world, dwarfing human settlement*.
- For Scarba, Lunga and the Garvellachs NSA, a medium magnitude of impact and **moderate** significance would be appropriate for the SLQ *Uninhabited, Remote, Wild Islands*.

We generally agree with the assessment of effects on all the LLAs. **Significant** effects of up to **major** significance are predicted for North and West Islay (Coast) and Central, South and West Mull LLAs, and we consider these conclusions appropriate given the extent of visibility identified within the ZTV analysis and the influence of the proposal on the perceptual qualities of these landscapes. Effects on the Jura LLA are assessed as minor and not significant, which also appears reasonable given the distance of the proposal, the partial screening of Colonsay and limited extent of visibility identified within the assessment.

Visual

The SLVIA assesses 30 viewpoints spread across an area up to 60km from the WDA, with either **moderate** or **major significant** effects predicted at 16 of these. Significant visual effects are predicted across a wide area encompassing many of the islands of the Hebrides to the north, south and east of the WDA, at distances of up to 39km from the development.

We consider that effects assessed at several of the viewpoints which were assessed in the SLVIA as not significant, should be considered as **significant**. These are Viewpoint 17: Oban - Colonsay Ferry, Viewpoint 24: Staffa, Viewpoint 27: Ben More, Mull, and Viewpoint 19: Hynish, Tyree. Although these locations lie a considerable distance from the WDA, the very large scale and spread of the proposal mean it would still significantly affect the visual amenity. In addition, we consider that visual effects experienced from Viewpoint 18: Scarab and 19: Cnoc Dhomhuill could, arguably, also be **significant** in clear weather conditions.

The review also considers that for four seven viewpoints the significance of effect should be increased from **moderate** and **significant** to **major** and **significant** due to under-evaluation of either sensitivity or magnitude of effect. These include Viewpoint 9: Colonsay to Port Askaig Ferry, Viewpoint 10: Loch Tarbert, Jura, Viewpoint 11: Beinn an Oir, Jura, Viewpoint 15: Urugaig, Colonsay Viewpoint 16: Summit of Beinn nan Gudairean, Colonsay, Viewpoint 21: Mull – Iona Ferry and Viewpoint 22: Dun I, Iona.

We also consider that visual effects on residents of Iona, Colonsay and Islay have not been adequately assessed within the SLVIA. The assessment of visual effects experienced from settlements has been limited to include only settlements found within the A&B LDP despite much of the islands' population being in scattered communities. In addition, some viewpoints have been assessed without taking the high sensitivity of residents into account and viewpoints that are stated to represent residential receptors have not been located close to residential properties at Baile Mor and Sligneach on Iona, Kilchattan and Urugaig on Colonsay and Portnahaven on Islay.

The proposal's size and spread mean that it would significantly affect the visual amenity of over a very extensive area of some of the most valued and scenic seascapes in Scotland. The islands of Colonsay, Oronsay, Islay, Jura, Mull, Iona and Staffa are known for their unspoilt and beautiful scenery and many tourists come to experience their remote undeveloped character.

Review against relevant policies:

NPF Policy 4c and National Marine Plan Policy GEN 7 state that proposals that will affect a National Park, National Scenic Area, Site of Special Scientific Interest or a National Nature Reserve will only be supported where:

- i. The objectives of designation and the overall integrity of the areas will not be compromised; or
- ii. Any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance.

Based on our review, the proposal would result in **significant** adverse effects on several SLQs within the NSAs, which may affect the objectives or integrity of the designation, such that social, environmental or economic benefits of national importance would need to outweigh the effects for the proposal to be supported.

The SLVIA identifies **significant** effects for the North and West Islay (Coast) and Central, South and West Mull LLAs. NPF Policy 4d require significant effects on the integrity of LLAs or the qualities for which they have been designated to be clearly outweighed by social, environmental or economic benefits of at least local importance.

The **significant** effects identified on the NSA SLQs and North and West Islay (Coast) and Central, South and West Mull LLAs also result in a conflict with Argyll and Bute LDP2 Policies 70 and 71, which seek to protect the integrity, character and special qualities of these designated landscapes.

NPF 4 Policy 11e requires project design and mitigation to demonstrate how impacts on communities and significant landscape and visual impacts are addressed. In terms of significant landscape and visual impacts, 11e ii states that such impacts are to be expected for some forms of renewable energy and where impacts are localised and/or appropriate design mitigation has been applied, they will generally be considered acceptable. NPF4 provides no guidance on the definition of what constitutes localised effects.

Table 16.154 in Section 16.8 of the SLVIA outlines embedded mitigation measures included in the wind farm proposal. These include:

- Development of and adherence to a Lighting and Marking Plan setting out set out the marine and aviation navigational lighting and marking measures to be applied during the construction and operation of the WDA to be secured under Section 36 and marine licence consent conditions;
- A buffer of at least 12km between the WDA and the nearest points of Islay and Colonsay, which the SLVIA States 'will reduce the magnitude of impact on seascape, landscape and visual impact receptors' and notes that further refinement of the WDA boundary is likely once additional data is collected following the completion of further WDA surveys and studies, and as part of the outcomes of the EIA process, including feedback from stakeholders.
- Refinement of the WDA following review of the Scoping Opinion and public and stakeholder consultation to reduce potential impacts on various receptor groups., resulting in a reduction in the WDA area by approximately 40% when compared with the W1 Plan Option Agreement Area and consequent reduction in the horizontal spread of turbines.

In addition to the refinement of the WDA boundary, the Applicant prepared a design strategy in collaboration with NatureScot. This strategy establishes a series of landscape and visual design objectives intended to minimise likely significant effects on the SLQs of the Jura, Loch na Keal (Isle of Mull) and Scarba, Lunga and Garvellachs NSAs. There are four themes that comprise the objectives, which include Project Scale, Project Extent and Orientation, Turbine Layout and Location Specific Measures. Collectively these aim to reduce the apparent scale and visual influence of the proposal, whilst recognising some seascape, landscape and visual change is inevitable. The design strategy (outlined in EIAR Appendix 15) acknowledges that design development is an ongoing process and that the design objectives will continue to inform refinement of the final turbine layout during post-consent stage, in consultation with NatureScot as required.

Although the above design/ mitigation measures may be considered appropriate and may have reduced landscape and visual effects to some extent, **significant** effects remain for large numbers of receptors. **Significant** visual impacts of the proposals would be experienced by Island communities of Iona, Islay and Colonsay which we consider to be a more than localised area. The proposal would introduce visually prominent wind farm development to a widely visible area of the landscape/ seascape that has none, significantly altering the way the landscape and seascape would be perceived.

The proposal could also be argued to be contrary to Schedule 9, paragraph 3 of the Electricity Act 1989 to have regard to the desirability of preserving natural beauty and to NPF4 Policy 4(a) which withholds support from development whose type, location or scale makes its impact on the natural environment unacceptable.

▪ Key viewpoints to be considered by the Planning Committee

- Viewpoint 1: Ardnave Point, Islay
- Viewpoint 2: Saligo Bay, Islay
- Viewpoint 3: Kilchoman, Islay
- Viewpoint 4: Creag Bealach na Caillich, Islay
- Viewpoint 5: Minor Rd near Portnahaven, Islay
- Viewpoint 7: Beinn Bheigier, Islay
- Viewpoint 9: Colonsay to Port Askaig Ferry
- Viewpoint 10: Loch Tarbert, Jura
- Viewpoint 11: Beinn an Oir, Jura
- Viewpoint 13: Oronsay Priory, Oronsay
- Viewpoint 14: B8086 south of Lower Kilchattan, Colonsay
- Viewpoint 15: Uragaig, Colonsay
- Viewpoint 16: Summit of Beinn nan Gudairean, Colonsay
- Viewpoint 17: Oban-Colonsay Ferry
- Viewpoint 18: Scarba
- Viewpoint 19: Cnoc Dhomnuill, Luing
- Viewpoint 20: Erraid, Mull
- Viewpoint 21: Mull – Iona Ferry
- Viewpoint 22: Dun I, Iona
- Viewpoint 24: Staffa
- Viewpoint 27: Ben More, Mull
- Viewpoint 29: Hynish, Tiree