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**Marine Directorate Licensing Operations Team**
Scottish Government

29th August 2026

Dear Sir/Madam,

**Objection to the MachairWind Offshore Wind Farm.**

Scottish Environment LINK welcomes the opportunity to comment on the Environmental Impact Assessment (EIA) for the proposed MachairWind Offshore Wind Farm.

LINK supports the urgent transition to renewable energy as part of Scotland's response to the climate and nature emergencies. However, offshore renewable energy developments must be planned and delivered in a manner that safeguards biodiversity; respects environmental limits, Scotland's landscapes, and impacted communities; and ensures compliance with marine conservation legislation. The consenting process for this development should be embedded within a genuinely holistic, nature-positive framework for marine spatial planning that proactively sequences and spatially manages competing licensable activities, rather than assessing this application in isolation from the cumulative, sector-wide pressures on the same marine space.

We are deeply concerned that the MachairWind proposal, as currently presented, has not demonstrated that it will avoid hindering the conservation objectives of the Sea of the Hebrides Marine Protected Area (MPA), designated for basking shark, minke whale, fronts and marine geomorphology of the Scottish shelf seabed. The MPA was designated specifically to conserve basking sharks, minke whales and the oceanographic features that support them[1][2]. The proposed wind farm is situated just below the southern boundary of the Sea of the Hebrides MPA and, given that at least two of the designated Priority Marine Features (PMF) of the MPA are highly mobile and

[1] https://www.gov.scot/publications/sea-hebrides-marine-protected-area-business-regulatory-impact-assessment/pages/3/
[2] https://www.gov.scot/publications/arine-protected-areas-mobile-marine-species-consultation-proposals-designate-four-new-marine-protected-areas-scottish-waters/pages/8/

form seasonal summer aggregations, it is likely that these aggregations and migratory routes will be impacted by the construction and siting of the development[3].

Whilst our response focuses on the potential impacts of MachairWind on the Sea of the Hebrides MPA, similar concerns also apply to harbour porpoise, a qualifying feature of the Inner Hebrides and the Minches Special Area of Conservation (SAC), which lies approximately 0.4 km from the Development Area. The underwater noise modelling demonstrates that relatively modest reductions in source levels could substantially reduce the scale of impact. This demonstrates the significant benefit of reducing noise at source. However, Noise Abatement Systems remain optional within the draft Marine Mammal Mitigation Protocol. Given the proximity of these protected sites to the Development Area and the potential spatial extent of the predicted impacts, LINK members consider that effective noise abatement should be committed as a primary mitigation measure and that the applicant should demonstrate that the proposed mitigation is sufficient to avoid hindering the conservation objectives of the sites and minimise impacts on the protected features.

We are also concerned about the magnitude of impact the development will have on some of Scotland's most beautiful seascapes, and by extension the islands that are part of these. We are concerned the development will have a negative cultural, and socio-economic impact on these islands, and disagree with the conclusions reached on these by the applicant. We also dispute the comprehensiveness of the EIA in exploring the impacts on seascape and island communities, and seabird impacts. The applicant has omitted key viewpoints in the visual assessment which means the conclusions in Chapter 16 are fundamentally flawed. These flawed findings are then used to inform later conclusions about the socio-economic impacts of the development, resulting in inaccurate and underestimated predictions of impact. Without addressing these methodological issues, the application cannot be fully considered.

LINK therefore objects to the application on the grounds that:

a) the EIA does not provide sufficient certainty that the conservation objectives of the Sea of the Hebrides MPA and the Inner Hebrides and the Minches SAC can be achieved and maintained, particularly in relation to basking shark, minke whale and harbour porpoise.
b) The proposal raises significant concerns regarding underwater noise, displacement, disturbance, vessel impacts and cumulative effects. Taken together, these uncertainties mean that Scottish Ministers cannot presently be satisfied that the proposal will not hinder achievement of the conservation objectives of the MPA.
c) We disagree with the conclusions drawn in Chapter 16 about the severity and magnitude of the visual impact on Iona, Staffa, and the Treshnish Isles.
d) The severity and scale of impact on the seascape, cultural heritage, economies, and habitability of surrounding islands are underestimated.

[3] Witt, M.J., Doherty, P.D., Godley, B.J. Graham, R.T. Hawkes, L.A. & Henderson, S.M. 2016. Basking shark satellite tagging project: insights into basking shark (Cetorhinus maximus) movement, distribution and behaviour using satellite telemetry. Final Report. Scottish Natural Heritage Commissioned Report No. 908.

e) Chapter 16 is not comprehensive- it misses out key viewpoints in the visual assessment which means the conclusions are fundamentally flawed.
f) Chapter 18 uses these flawed conclusions in its assessment of the socio-economic impacts of the development, thereby resulting in a severe underestimation of the magnitude and severity of impact.
g) We query the accuracy of the baseline data for impacts to seabirds, and the applicant's assessment of "moderate" impact. However, we have not had the capacity to fully investigate this.

**Statutory Duties Relating to the Sea of the Hebrides MPA**

The Sea of the Hebrides is a Nature Conservation MPA designated under the Marine (Scotland) Act 2010. The conservation objective for basking shark and minke whale is to conserve these PMFs in favourable condition.

Under Part 5 of the Marine (Scotland) Act 2010, public authorities must exercise their functions in a manner that furthers, or where this is not possible least hinders, the conservation objectives of MPAs. Where a proposed activity can affect an MPA feature other than insignificantly, the potential impact on the conservation objectives must be carefully assessed before consent is granted. We consider that the conservation objectives are likely to be affected given the proximity of the proposed development to the MPA and the highly mobile nature of minke whales and basking sharks.

NatureScot's Conservation and Management Advice identifies underwater noise, disturbance, displacement and vessel interactions as important pressures affecting basking sharks and minke whales[4]. It advises that, to achieve the conservation objectives, risks of injury and mortality should be minimised, access to resources should be maintained and supporting ecological processes should be conserved[5].

The key question for decision-makers is not simply whether significant population-level impacts have been demonstrated at broad management-unit scales. Rather, the relevant question is whether the applicant has demonstrated that the conservation objectives of the Sea of the Hebrides MPA will not be hindered. In our view, the EIA fails to provide sufficient evidence to reach that conclusion.

**Importance of the Sea of the Hebrides MPA and the wider Hebridean Sea**

The Sea of the Hebrides MPA is an important area for mobile marine species in Scotland. It was designated because the area supports nationally significant concentrations of basking sharks and minke whales and contains highly productive frontal systems that create important feeding opportunities for both species[6].

[4] https://www.nature.scot/sites/default/files/nature-conservation-mpa/10474/conservation-and-management-advice.pdf
[5] https://www.nature.scot/sites/default/files/nature-conservation-mpa/10474/conservation-and-management-advice.pdf
[6] https://www.nature.scot/doc/naturescot-research-report-1364-hebridean-cetacean-research-programme-2021-2024

Scientific evidence underpinning the MPA designation demonstrates that basking sharks repeatedly use the area and show site fidelity to important feeding habitats within the region[7]. The site is also recognised as one of the most important areas in Scottish waters for minke whales. Both species are also associated with oceanic frontal systems[8], also a designated feature of the MPA and which may be disrupted by inappropriately sited infrastructure.

The MPA therefore exists not simply because individuals occasionally pass through the area, but because these waters provide habitat of exceptional ecological significance which contributes directly to the conservation of these species. The EIA does not adequately acknowledge the importance of this ecological context when assessing risk and significance.

**Application of the Precautionary Principle**

The precautionary principle is a fundamental component of environmental decision-making and is particularly important where uncertainty exists regarding protected features of an MPA.

The EIA acknowledges substantial uncertainty regarding:

- behavioural responses of basking sharks and minke whales to construction activities;
- the magnitude and duration of displacement effects;
- cumulative impacts arising from multiple offshore developments;
- long-term impacts of repeated disturbance;
- the effectiveness of proposed mitigation measures.

However, throughout the assessment, precautionary modelling outputs and potentially significant effects are repeatedly moderated through professional judgement and assumptions regarding mitigation effectiveness.

Where uncertainty remains concerning impacts on protected features of an MPA, that uncertainty should weigh in favour of environmental protection rather than development. The burden of proof therefore rests with the applicant to demonstrate that the conservation objectives of the Sea of the Hebrides MPA will not be hindered. LINK does not consider that this burden has been discharged.

**Impacts on Minke Whale**

The proposed development lies near the Sea of the Hebrides MPA and its designated minke whale feature. NatureScot has identified underwater noise as a significant pressure affecting minke whales and advises that disturbance and injury risks should be minimised[9]. The applicant's own assessment identifies pile-driving noise as a key impact pathway. The EIA subsequently relies heavily upon mitigation measures and assumptions regarding behavioural responses to conclude that residual effects will not be significant.

[7] https://www.nature.com/articles/srep42837
[8] https://www.int-res.com/journals/meps/articles/meps248187
[9] https://www.nature.scot/sites/default/files/nature-conservation-mpa/10474/conservation-and-management-advice.pdf

This approach is concerning as the assessment recognises potentially extensive zones of influence for underwater noise generated during construction. There also remains considerable uncertainty regarding how minke whales respond to repeated disturbance and displacement. Finally, the assessment does not adequately consider how multiple seasons of construction activity may affect use of important feeding habitat within and adjacent to the protected area. The assessment gives insufficient weight to the fact that the MPA was designated specifically because these waters are of particular importance to minke whales.

A conclusion that animals may theoretically use habitat elsewhere does not address whether displacement from preferred habitat within a protected area would undermine the conservation objectives for which that protected area was established. The EIA therefore fails to demonstrate that minke whale conservation objectives will not be hindered.

**Impacts on Basking Shark**

The implications for basking sharks are equally concerning. The Sea of the Hebrides MPA was designated to protect one of the most globally significant known areas for basking shark aggregation, feeding and potentially courtship behaviour[10]. Scientific studies have demonstrated repeated use of this region and highlighted its importance to the species.

Basking sharks are vulnerable to disturbance, vessel interactions and underwater noise[11]. NatureScot's advice identifies these pressures as potentially affecting the conservation objectives for the species. Despite this, significant uncertainty remains regarding basking shark behavioural responses to offshore wind construction activities, vessel movements and associated habitat disturbance.

The applicant has not demonstrated that displacement from important feeding areas can be ruled out. Nor has adequate consideration been given to cumulative pressures arising from offshore wind development across the west coast of Scotland. Given the conservation importance of the area and the remaining scientific uncertainty, a precautionary approach is required.

**MPA Conservation Objectives and Ecological Function**

A fundamental weakness of the EIA is its reliance on broad management-unit assessments that fail to reflect the ecological basis of the nearby MPA designation. The Sea of the Hebrides MPA protects not only basking sharks and minke whales, but also the oceanographic fronts that support productivity and create predictable feeding opportunities. These fronts are recognised as a key ecological feature of the site and provide an important functional link between protected species and the wider ecosystem.

NatureScot's advice explicitly states that maintenance of access to resources and conservation of supporting ecological processes are important components of achieving the MPA's conservation

[10] https://www.nature.scot/sites/default/files/Publication 2016 - SNH Commissioned Report 908 - Basking shark satellite tagging project - insights into basking shark (Cetorhinus maximus) movement, distribution and behaviour using satellite telemetry - Final report.pdf

[11] https://www.nature.scot/sites/default/files/nature-conservation-mpa/10474/conservation-and-management-advice.pdf

objectives. It is insufficient simply to conclude that displaced animals could relocate elsewhere. Such displacement may itself undermine the ecological rationale for designation if it disrupts use of habitat known to be nationally important. The EIA does not adequately address this issue.

**The Argyll Array (2013)**

The broader regional context is highly relevant. ScottishPower Renewables' Argyll Array proposal off Tiree was withdrawn in December 2013 following extensive technical and environmental investigations. Contemporary reports identified the significant presence of basking sharks as one of the major environmental constraints associated with the project, alongside engineering and commercial challenges.

Argyll Array generated substantial research into basking shark ecology and highlighted the environmental sensitivity of this region. Extensive assessments were undertaken specifically because of concerns regarding basking shark presence and habitat use. Importantly, Argyll Array pre-dated formal designation of the Sea of the Hebrides MPA. Since then, the ecological significance of these waters for basking sharks and minke whales has been formally recognised through MPA designation and supported by an expanded scientific evidence base.

While each application must be considered on its own merits, the Argyll Array experience clearly demonstrates that the wider region has long been recognised as environmentally sensitive and that substantial uncertainty regarding impacts on basking sharks is not a new issue. If basking shark presence represented a material environmental constraint prior to MPA designation, a more rigorous application of the precautionary principle is warranted now that the nearby area is formally protected for this feature.

**Concerns Regarding Mitigation**

LINK shares concerns raised by marine conservation organisations regarding the reliance placed on mitigation measures to reduce significant impacts[12]. The assessment depends heavily upon assumptions regarding the effectiveness of noise mitigation, marine mammal mitigation protocols, acoustic deterrent devices and monitoring measures. However, the evidence presented does not demonstrate that these measures will achieve the reductions in impact assumed within the assessment. Where mitigation forms the basis for concluding that impacts are not significant, the applicant must demonstrate that those measures can achieve the required outcomes. In the absence of such evidence, a precautionary interpretation should apply.

The assessment's approach to underwater noise mitigation also warrants further consideration. The underwater noise modelling demonstrates that a nominal 10 dB reduction in source levels would substantially reduce the predicted spatial extent of impacts on marine mammals, including reducing the maximum predicted PTS onset range for low-frequency cetaceans from up to 27 km to approximately 2.1 km when mitigation is considered. However, the draft Marine Mammal Mitigation Protocol currently identifies Noise Abatement Systems (NAS) as optional rather than committed

12 https://static1.squarespace.com/static/595bcd2e86e6c029dc28ac1d/t/6a74517ce30fd83fe1cb018e/1786007932091/MachairWind_EIA+response_HWDT_20260805.pdf

mitigation. Given the scale of the predicted impacts and the proximity of the Development Area to designated sites supporting cetaceans, LINK considers that effective noise abatement at source should form a committed mitigation measure. The applicant should demonstrate how the assumed noise reduction will be achieved in practice and secured through the final project design and MMMP.

**Landscape and cultural heritage impacts**

The application only fully assesses one photomontage from Iona, Staffa, and the Treshnish Isles (viewpoint 22, Dun I). Given the line of sight of the array area from Iona, Staffa, and the Treshnish Isles, as well as the cultural importance of the westward sea views, and the fact that Staffa and the Treshnish isles are in the Loch na Keal National Scenic Area, we believe using only viewpoint from one island is insufficient. Viewpoints that should be included are:

- Iona- St Columba's Bay and Carn Cul ri Eirinn, which both embody strong connections to Ireland and Iona's unique heritage as the birthplace of Scottish Christianity.
- Iona- The view from St Mary's Chapel westward
- Iona- The Marble Quarry, a scheduled monument that would look directly at the array.
- Staffa- View from the top of the island above Fingal's Cave
- Treshnish Isles- View from the top of the island of Lunga

The applicant concluded that the impact of the development on the viewpoint that was assessed (viewpoint 22, Dun I), would be of medium magnitude and that the effect significance of the windfarm when operational would be "moderate and significant". We disagree with this finding. It overemphasises the distance and horizontal angle of the array and does not give enough weight to how the array area will change the character of the seascape. The seascape from Iona is particularly important historically and culturally as it contributes in large part to the feeling of tranquillity, spirituality, wildness and remoteness the island is known for. The view west from Iona is important culturally as it looks towards Ireland, where Columba travelled from before landing on the western edge of Iona, and subsequently spreading Christianity throughout Scotland. The array area, even at its proposed distance, will create a new, industrial focal point in the landscape which will detract from people's experience of Iona

**Socio-economic impacts**

The economies of Iona and Mull are closely tied with the attractiveness wildlife, cultural heritage, geology, and atmosphere of wildness and spirituality of the surrounding islands. Iona attracts between 20-30k visitors per year, and almost 100k people visit Staffa per year (National Trust for Scotland, 2026).

Chapter 18 (on the socio-economic impacts of the development) uses the conclusions drawn in Chapter 16 on landscape. As discussed above, Chapter 16 is not comprehensive as it misses out key viewpoints. We also disagree with the findings in Chapter 16 about the one viewpoint that was considered (viewpoint 22, Dun I). The result of this is that the socio-economic impacts in Chapter 18 are severely underestimated, and the conclusions drawn are inaccurate.

The applicant states that because the islands near the array area have many individual features that attract tourists, degrading one of them (i.e. visual amenity) will not have a negative impact on the visitor economy. However, the seascapes of Iona, Staffa and the Treshnish Isles are intrinsically linked to the cultural and spiritual offering of the islands, which is one of the biggest draws for tourists. We do not agree that the visual amenity can be considered as equal to the other individual features of the islands, and argue that the visual amenity is of such importance, the array will have a direct, detrimental effect on the islands. The development will remove the feeling of remoteness in the seascape, and although only west coast beaches would be affected, the westward view is the one that most draws the eye and is of most importance to Iona.

**Conclusion**

LINK considers that the applicant has failed to demonstrate that the project will not hinder achievement of the conservation objectives of the adjacent Sea of the Hebrides MPA and Inner Hebrides and the Minches SAC. LINK also calls into question the assessments by the applicant in relation to seabird impacts and visual impacts. In the absence of sufficient scientific certainty that the project will not hinder achievement of adjacent MPA conservation objectives, Scottish Ministers should refuse consent in accordance with their duties under the Marine (Scotland) Act 2010 and the precautionary principle that underpins marine nature conservation decision-making.

Yours faithfully,

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This letter was compiled on behalf of Scottish Environment LINK's Marine Group and is supported by:
Hebridean Whale and Dolphin Trust
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