



HISTORIC
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Our case ID: 300071933

Your ref: MD-00012385 / MD-00012386

11 September 2026

Dear Marine Directorate

The Electricity Works (Environmental Impact Assessment) (Scotland)
Regulations 2017

The Electricity (Applications for Consent) Regulations 1990

The Marine Works (Environmental Impact Assessment) (Scotland)
Regulations 2017

MachairWind Offshore Development - Section 36 consent

Thank you for consulting us on this Environmental Impact Assessment (EIA) Report and application for consent. We received the consultation on 25 June 2026.

We have reviewed the report and considered the proposed development in terms of our historic environment interests. This covers cultural World Heritage Sites, scheduled monuments and their settings, category A-listed buildings and their settings, inventory gardens and designed landscapes, inventory battlefields and Historic Marine Protected Areas.

Your cultural heritage advisors will also be able to offer advice on impacts on the historic environment. This may include topics covered by [our advice-giving role](#), and other topics such as unscheduled archaeology, category B and C listed buildings, and conservation areas. From 1 January 2025, we no longer provide advice on undesignated underwater cultural heritage. It is therefore the responsibility of the competent authority to ensure that it has access to sufficient expertise to assess the EIA Report in accordance with the relevant regulations.

Our Advice

We **object** because the proposed development, as applied for under the Section 36 application and associated marine licence applications, would have a significant adverse impact on the settings of St Mary's Abbey, Iona, monastic settlement ([SM12968](#)), and Iona Abbey ([LB12310](#)).

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These effects would be contrary to policy GEN 6 of [Scotland's National Marine Plan](#) (NMP), which requires the settings of designated heritage assets to be appropriately protected.

The proposed development would result in a significant adverse impact on the integrity of the setting of St Mary's Abbey, Iona, Monastic Settlement (SM12968). As such, the development would fail to meet Policy 7(h)(ii) of NPF4, which requires significant adverse impacts on the integrity of the setting of scheduled monuments to be avoided.

In relation to Iona Abbey (LB12310), the development would fail to meet the requirements of Policy 7(c) of NPF4, which states that development proposals affecting the setting of a listed building should preserve its character and special architectural or historic interest.

Consequently, we do not consider that the applications demonstrate compliance with HEP1, HEP2 or HEP4 of the Historic Environment Policy for Scotland (HEPS).

Annex A addresses the application and Environmental Impact Assessment (EIA) Report, setting out relevant considerations, including our previous advice on the proposed development, the policy context, and our concerns regarding the methodology and conclusions presented in the Planning Statement. It focuses on the aspects we consider most significant and which have the greatest influence on both the application and the outcomes of the asset-specific assessments.

Annex B sets out our detailed objection in relation to St Mary's Abbey, Iona, monastic settlement (SM12968), and Iona Abbey (LB12310). It also includes comments on other designated assets within our remit that do not form part of our objection, but for which the applicant has identified likely significant EIA effects. These assets are:

- Oronsay Priory and Cross (SM287)
- Beinn a' Chaisteil, promontory fort and associated remains, Islay (SM13213)
- Dun Bheolain, fort, Islay (SM13214)
- Dubh Artach Lighthouse (LB12320)

Should Scottish Ministers determine that the identified significant adverse effects on the settings of St Mary's Abbey, Iona, monastic settlement (SM12968), and Iona Abbey (LB12310) are acceptable and grant consent for the Section 36 application and associated marine licences, we would require consultation on the Design Specification and Layout Plan (DSLP) (including Design Statement). Whilst this would not mitigate the significant adverse effects identified, it would provide assurance that the final turbine layout and design do not result in greater impacts on these assets than those assessed in the EIA Report.

Further Information

Decisions that affect the historic environment should take the [Historic Environment Policy for Scotland](#) (HEPS) into account as a material consideration. HEPS is supported by our [Managing Change guidance series](#).

We hope this is helpful. If you would like to submit more information about this or any other proposed development to us for comment, please send it to our consultation mailbox, hmconsultations@hes.scot. If you have questions about this response, please contact Jessica Malone at jessica.malone@hes.scot.

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Yours sincerely

Historic Environment Scotland



ANNEX A

The Proposed Development

We understand that the proposed development comprises three development areas:

- the Wind Farm Development Area (WDA);
- the Offshore Export Cable Corridor (ECC); and
- the Onshore Transmission Development Area (OnTDA).

Wind Farm Development Area (WDA)

This Section 36 application, EIA Report and marine licences relate to the Wind Farm Development Area (WDA), which covers 448 km² and is located off the west coast of Scotland, 12.4 km west of Colonsay and 21 km south-west of Iona.

Based on the wind turbine generators (WTGs) likely to be available when construction starts, the project design envelope includes either 91 larger WTGs, with a blade-tip height of 335 m, or 144 smaller WTGs, with a blade-tip height of 280 m. The associated offshore infrastructure would include offshore substation platforms, fixed foundations with scour protection, and various cable types, where these fall within the WDA application boundary. The EIA Report uses a Rochdale Envelope approach to assess potential environmental impacts.

Offshore Export Cable Corridor (ECC) and Onshore Transmission Development Area (OnTDA)

We understand that the WDA will connect to a new High Voltage Direct Current (HVDC) switching station that the Transmission System Operator will build near Girvan, and that separate consent and licence applications will be submitted for the Offshore Export Cable Corridor (ECC) and the Onshore Transmission Development Area (OnTDA).

We welcome the fact that the EIA Report explains the assumptions made for the Offshore ECC and OnTDA, including their expected components, so that potential interactions and combined effects can be assessed with the WDA.

Our Previous Advice

We have engaged extensively on this proposed development over several years. The summary below sets out our consultation responses at recent stages of the process, focusing on our key advice.

Scoping (November 2024)

At scoping, the proposed development comprised up to 147 turbines (340 m). We identified the potential for significant effects on Dubh Artach Lighthouse (LB12320), noting that the proposed turbines would be readily visible in views from and towards the lighthouse and could significantly affect how its setting contributes to the understanding, appreciation and experience of its cultural significance.

We also highlighted the need for the EIA assessment to give particular consideration to monuments with strong visual connections to the sea, where that relationship contributes



substantively to their cultural significance, as well as to sites with monastic or early Christian associations that may be especially susceptible to effects on their setting. We provided detailed comments on the following assets, but emphasised this was not an exhaustive list:

- Beinn a' Chaisteil, promontory fort, Islay (SM13213)
- Nave Island, monastic site and Viking remains (SM3233)
- Oronsay Priory and Cross (SM287)
- Eileach-an-Naoimh, monastery, Garvellachs (SM90138)
- St Mary's Abbey, Iona, monastic settlement (SM12968)
- St Patrick's Chapel, Tiree (SM6905)

Regarding the assessment methodology, we recommended that the applicant refers to the [Environmental Impact Assessment \(EIA\) Handbook](#) (HES & SNH, 2018) for best practice advice on assessing cultural heritage impacts.

Pre-application (February - April 2026)

In our February and April 2026 pre-application advice, we acknowledged the proposed Rochdale Envelope approach and the updated range of scheme parameters of 91 to 144 turbines between 280 m and 335 m in height.

A key concern was that the visualisations focused on the lower 91-turbine scenario without a clear explanation of why this represented the worst case for cultural heritage receptors. We advised that primary heritage visualisations should depict a clearly justified worst-case layout and height combination, supported by secondary wirelines and clearer ZTV information showing turbine numbers.

We reiterated that setting should be assessed holistically, considering how surroundings contribute to the understanding, appreciation and experience of heritage assets, and that the cultural heritage assessment would require visualisations specifically designed to assess setting impacts, rather than relying solely on Seascape, Landscape and Visual Impact Assessment (SLVIA) material.

For Iona Abbey (LB12310) and the associated monastic settlement (SM12968), we advised that the development had the potential to affect the ability to understand, appreciate and experience these designated assets. We recommended additional photomontages in our letter dated 20 February 2026 and subsequently requested more detailed visualisations by email on 18 March 2026.

We also advised that further visualisations and assessment were required for Oronsay Priory and Cross (SM287), and for other assets where ZTVs and wirelines indicated the potential for impacts on setting, including Beinn a' Chaisteil promontory fort (SM13213), Nave Island monastic site and Viking remains (SM3233), and Dun Bheolain fort (SM13214).

Policy Context for the Historic Environment

National Marine Plan (NMP)

We have assessed the impacts of the proposal on heritage assets within our remit against the relevant policies set out in [Scotland's National Marine Plan](#) (Scottish Government,

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2015). The principal policy relating to the historic environment is **GEN 6: Historic Environment**, which states:

“Development and use of the marine environment should protect and, where appropriate, enhance heritage assets in a manner proportionate to their significance.”

In addition, the following supporting policy provisions are relevant to our assessment:

- **Paragraph 4.22:** Marine planning should help to ensure that future marine activities and developments can be carried out in a way that respects the marine historic environment and the setting of important coastal heritage assets. It can also help to increase the social and economic contribution of the heritage assets, for example by encouraging opportunities for public access.
- **Paragraph 4.23:** To achieve this, marine planners and decision makers should consider implications and opportunities for the historic environment taking into account the potential impacts of development and use on:
 - Designated heritage assets – representing sites of national or international significance for which statutory requirements apply. Designated assets should be protected in situ within an appropriate setting. Substantial loss or harm to designated assets should be exceptional and should only be permitted if this is necessary to deliver social, economic or environmental benefits that outweigh the harm or loss.
- **Paragraph 4.24:** Proposals for development and use that may affect the historic environment should provide information on the significance of known heritage assets and the potential for new discoveries to arise. They should demonstrate how any adverse impacts will be avoided, or, if not possible, minimised and mitigated. Where it is not possible to minimise or mitigate impacts, the benefits of proceeding with the proposal should be clearly set out.
- **Paragraph 4.25:** Where the case for substantial change to a heritage asset is accepted, marine decision-making authorities should require applicants to undertake suitable mitigating actions to record and advance understanding of the significance of the heritage asset before it is lost, in a manner proportionate to that significance. The resulting evidence should be made publicly accessible and copies of reports archived with the Royal Commission on the Ancient and Historical Monuments of Scotland and the adjacent Local Authority archaeology service.

Paragraph 4.23 cites [Managing Change in the Historic Environment: Setting](#) (HES, 2020) as relevant guidance on setting.

National Planning Framework 4 (NPF4)

We have assessed the impacts of the proposal on heritage assets within our remit against national policies as set out in the [National Planning Framework 4](#) (Scottish Government, 2023). Part 3 Annex A clarifies that a developer/decision maker should read NPF4 as a whole.

The policies outlined below are not exhaustive; however, they represent those most relevant to informing our position.

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The first is **Policy 7(a)**, which reads:

Development proposals with a potentially significant impact on historic assets or places will be accompanied by an assessment which is based on an understanding of the cultural significance of the historic asset and/or place. The assessment should identify the likely visual or physical impact of any proposals for change, including cumulative effects and provide a sound basis for managing the impacts of change. Proposals should also be informed by national policy and guidance on managing change in the historic environment, and information held within Historic Environment Records.

The second is **Policy 7(c)**, which reads:

Development proposals for the reuse, alteration or extension of a listed building will only be supported where they will preserve its character, special architectural or historic interest and setting. Development proposals affecting the setting of a listed building should preserve its character, and its special architectural or historic interest.

The third is **Policy 7(h)**, which reads:

Development proposals affecting scheduled monuments will only be supported where:

- i. direct impacts on the scheduled monument are avoided;
- ii. significant adverse impacts on the integrity of the setting of a scheduled monument are avoided; or
- iii. exceptional circumstances have been demonstrated to justify the impact on a scheduled monument and its setting and impacts on the monument or its setting have been minimised.

Lastly, **Policy 11 (e)** reads:

In addition, project design and mitigation will demonstrate how the following impacts are addressed ... vii. impacts on historic environment.

Sectoral Marine Plan for Offshore Wind Energy (SMP)

The [Sectoral Marine Plan for Offshore Wind Energy](#) (Scottish Government, 2020) aims to identify sustainable plan options for the future development of commercial-scale offshore wind energy in Scotland. In 2020, we were consulted on the draft plan and its accompanying Strategic Environmental Assessment (SEA) report. The proposed development lies within the option agreement (OA) area identified in the plan as **W1**. In our response, we noted the potential for effects on the settings of terrestrial heritage assets and advised that these should be considered at the project level:

“Given the proximity of sections of this OA to the coast, particular consideration should be given to the potential for adverse effects on the setting of terrestrial historic environment assets at any project-level stage.”

“As with our comments submitted in relation to SW1, the proximity of sections of this DPO to terrestrial historic environment assets, such as forts and religious settlements on both Oronsay and Islay, may mean that wind turbines have the potential to affect the settings of

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such sites. The mitigation outlined for W1 should therefore ensure that these matters are considered at the project level, alongside the mitigation identified in relation to works within the DPO and the potential coastal effects of associated infrastructure.”

The Sectoral Marine Plan was reassessed in 2025 following an increase in the potential generating capacity of the plan options. In our response, we largely reiterated our previous advice, highlighting the potential for significant adverse effects on the settings of terrestrial heritage assets and welcoming the updated assessment’s recognition of this potential within area W1.

While the Sectoral Marine Plan informs decision-making on licence and consent applications, it does not pre-determine outcomes. It is one material consideration among many, and all developments within an OA area remain subject to the standard assessment and consenting procedures set out in the National Marine Plan (NMP).

Historic Environment Policy for Scotland (HEPS)

We have considered the proposals in light of the policies within the [Historic Environment Policy for Scotland](#) (HES, 2019), which is a material consideration for decisions that affect the historic environment. We consider the key policies in this case are:

- **HEP1:** Decisions affecting any part of the historic environment should be informed by an inclusive understanding of its breadth of cultural significance.
- **HEP2:** Decisions affecting the historic environment should ensure that its understanding and enjoyment as well as its benefits are secured for present and future generations.
- **HEP4:** Changes to specific assets and their context should be managed in a way that protects the historic environment. Opportunities for enhancement should be identified where appropriate. If detrimental impact on the historic environment is unavoidable, it should be minimised. Steps should be taken to demonstrate that alternatives have been explored, and mitigation measures should be put in place.

Managing Change Guidance

We have also referred to our [Managing Change in the Historic Environment](#) guidance series, which provides best practice advice for decision makers on applying the policies above. The most relevant document in the series in this case is [Managing Change in the Historic Environment: Setting](#) (HES, 2020).

The Environmental Impact Assessment Report

We consider that the Environmental Impact Assessment (EIA) Report contains sufficient information for us to reach a view on the applications for consent. Our comments below relate to the assessment methodology, mitigation, and the application of relevant policy.

Assessment Methodology

We had the opportunity to review the proposed methodology for the cultural heritage assessment in October 2024 and responded in our letter dated 27 November 2024. In that response, we recommended that the applicant refer to the [EIA Handbook](#) for best practice guidance on the assessment of cultural heritage impacts.

We reiterated this position during our meeting with the applicant on 13 June 2025, when we stated that we expected the assessment to follow the approach set out in the Handbook and that a clear written justification should be provided where the EIA Report departed from that approach. This is reflected in the minute the applicant shared with us on 31 July 2025.

The assessment methodology used by the applicant differs from the EIA Handbook, and it contains statements that we disagree with. Rather than addressing each of these points individually, our comments below focus on the aspects we consider most significant and which have the greatest influence on the application of the assessment methodology and the outcomes of the asset-specific assessments.

Assessment Matrix

The methodology chapter (Chapter 5) contains a standard assessment matrix for determining likely significant effects, which has been adapted for use in the cultural heritage chapter (Chapter 14). This includes the magnitude of impact table, where Table 5.6 in Chapter 5 has been adapted as Table 14.15 in Chapter 14 (page 88).

The definition of a medium adverse magnitude of impact in Table 5.6 refers to “*considerable, permanent/irreversible changes*”. Although this differs from the definition provided in the EIA Handbook, we consider it proportionate to the higher and lower magnitude categories. However, we do not consider the revised definition of a medium adverse magnitude of impact in Table 14.15 to be similarly proportionate, which creates issues in the application of the assessment methodology. Within Table 14.15, a medium adverse magnitude of impact is defined as:

“Elements of the asset’s fabric and/or setting which contribute to its significance are affected, but to a more limited extent, resulting in an appreciable, but partial, loss of the asset’s cultural significance.”

By contrast, the equivalent moderate adverse magnitude category in Appendix 1, Figure 1 of the EIA Handbook (page 184) is described as:

“Changes to the elements of the fabric or setting of the heritage asset that contribute to its cultural significance such that this is substantially altered.”

We consider that the applicant’s definition of a medium adverse impact represents a lower level of effect than the equivalent moderate category in the EIA Handbook. We also consider that it is disproportionately low in comparison with the high adverse category in Table 14.15, which refers to cultural significance being “*lost or severely compromised*”. As a result, the assessment methodology may understate the magnitude of impacts on the significance of heritage assets arising from changes to their setting.

Setting

We previously advised that the assessment of impacts on the setting of designated heritage assets should follow the approach in our [Managing Change: Setting](#) guidance. This comprises three stages:

- **Stage 1:** identify the historic assets that might be affected by the proposed development

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- **Stage 2:** define and analyse the setting by establishing how the surroundings contribute to the ways in which the historic asset or place is understood, appreciated and experienced
- **Stage 3:** evaluate the potential impact of the proposed changes on the setting, and the extent to which any negative impacts can be mitigated

Whilst Appendix 14.3 states that it follows this guidance and recognises setting as “*the way the surroundings of a historic asset or place contribute to how it is understood, appreciated and experienced*” (Page 10), these three factors of setting are not consistently referenced in either the “Present Setting” or “Change to Setting” sections of the assessments. Instead, the assessments frequently describe baseline conditions or refer to visibility without further explanation.

We would expect an assessment based on the approach set out in our Managing Change: Setting guidance to clearly follow the three stages and explain impacts in terms of the three factors of setting. Some assessments refer solely, or predominantly, to understanding in their discussions of the existing setting and changes to that setting. As setting comprises three distinct but related factors, it is insufficient to consider only one of these aspects (for example, understanding) where appreciation and/or experience may also be affected. All three factors are equally important to the setting and cultural significance of a designated asset. Equal weight should therefore be attached to each, and none should be given greater importance over another.

Overall, we consider that Appendix 14.3 does not consistently or effectively follow the staged approach set out in our Setting guidance, particularly in relation to Stages 2 and 3.

We understand that an initial screening assessment was undertaken, corresponding to Stage 1 of the assessment process. However, this assessment does not appear to have been included as an annex to Appendix 14.3, and we are therefore unable to comment on its application of the guidance.

As the assessments do not consistently follow the methodology set out in the Managing Change: Setting guidance, we consider that some of the conclusions regarding impacts on setting are unclear and insufficiently substantiated. We explain below where we disagree with the conclusions reached in relation to specific assets, focusing on those we consider most likely to be affected by the proposed development.

We wish to reiterate that whether or not a site is visited does not change its inherent value or its sensitivity to alterations in its setting. An asset has a setting regardless of whether it is visited, and sites do not need to be visually prominent to have a setting, as explained in the Managing Change: Setting guidance. The degree of preservation is not relevant to how setting contributes to the cultural significance of an asset. Designations, such as those for scheduled monuments, may apply to partial remains that are of national importance (see [our Designation Policy and Selection Guidance](#)).

Mitigation

The EIA Handbook explains that “*one of the main purposes of EIA is to ensure that potentially significant environmental effects of proposed projects are avoided or reduced*”

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(page 77). Mitigation plays a key role in achieving this. For cultural heritage, mitigation by avoidance, such as through project design, is the preferred approach within the mitigation hierarchy, followed by mitigation through reduction (page 185).

Despite this, the cultural heritage chapter (Chapter 14) proposes no mitigation measures relating to setting impacts. This includes the embedded mitigation table (Table 14.13, page 84) and the stand-alone setting assessment (Appendix 14.3).

Cultural heritage is briefly considered in the site selection and alternatives chapter (Chapter 4). A 2 nm buffer around Dubh Artach Lighthouse (LB12320) is identified as mitigation for setting impacts in Table 4.5. However, this buffer appears to have been included in response to the Northern Lighthouse Board's request for a 2 nm exclusion zone to accommodate helicopter operations and maintenance vessel access (page 33). The chapter does not explain how the buffer would reduce setting impacts on the category A-listed lighthouse.

Table 4.5 (Cultural Heritage row, impacts on setting of heritage assets) also refers to refinement of the WDA to the north, east and south as mitigation for setting impacts, while incorrectly referring to "SLVIA effects" in one of the columns. Setting is the way the surroundings of a historic asset or place contribute to how it is understood, appreciated and experienced. Assessment of setting is distinct from SLVIA, and a reduction in SLVIA effects cannot be assumed to result in a corresponding reduction in setting impacts. This also applies to other instances in the chapter where cultural heritage is discussed in relation to SLVIA, for example on page 37.

The methodology chapter (Chapter 5) states that where significant effects are identified, additional mitigation measures will be considered where appropriate to avoid, prevent, reduce or offset them (page 22). Despite the cultural heritage assessment predicting significant effects for multiple assets, there is no discussion of mitigation through reduction. While we recognise that opportunities may be limited for a proposal of this scale, particularly where avoidance through design has not been achieved, we would still expect the EIA Report to address this and explain why further mitigation is not proposed. Accordingly, there are no measures relating to setting included in the WDA Mitigation and Commitments Register (Appendix 5).

We consider the absence of any substantive discussion of mitigation for adverse setting impacts to be a significant omission in the EIA assessment, and that the proposed development, as applied for under the Section 36 application and associated marine licence applications, fails to demonstrate compliance with the mitigation requirements of Policy GEN 6 of the National Marine Plan (NMP), Policy 11 (e) vii of NPF4 and HEP4 of the Historic Environment Policy for Scotland (HEPS). The implications of this for our position on the Planning Statement's conclusions regarding design and mitigation are discussed below.

Scottish Ministers may wish to have regard to schedule 9, paragraph 3(2)(a) of the Electricity Act 1989 as part of their decision making on this proposed development (the desirability of protecting sites, buildings and objects of architectural, historic or archaeological interest).



Design Envelope

Chapter 14 of the EIA Report states that the 91-turbine scenario would normally represent the worst case, as the taller turbines would be more prominent in views. However, it also acknowledges that the denser 144-turbine layout could result in greater impacts in some cases because of turbine stacking (Table 11.5, page 64). It explains that the worst-case layout shown is a “dense edge” layout, with turbines positioned towards the edges of the developable area. This is intended to maximise both the lateral spread of turbines and the potential for stacking, with the worst case considered for each receptor/asset. However, we consider that a layout which does not extend to the edge of the developable area could, in some views, increase the potential for turbine stacking if turbines are positioned more closely together.

Appendix 14.3 briefly addresses whether the upper or lower design parameters are likely to represent the worst-case scenario for each setting assessment. All assessments predict little or no difference in the magnitude of impact between the two scenarios, and several do not clearly identify a worst-case scenario. For example, the assessment of St Mary’s Abbey, Iona, monastic settlement (SM12968) states:

“In the case of this asset, identifying a worst case is very difficult given the distance from the array and the large number and dynamic nature of the views experienced as the viewer moves through the asset group. At the separation involved, any difference in magnitude of effect between the indicative 91 WTG and 144 WTG layouts is limited, but the increased scale and prominence of the larger WTGs, is likely to present the differentiating factor, albeit balanced by the denser layout required for the smaller WTGs” (page 88).

Although the larger-turbine (91 WTG) layout is described as the likely differentiating factor, this is qualified by the statement that the effects are balanced by the denser 144 turbine layout. As a result, the reader is left to interpret which layout is considered the worst case rather than being provided with a clear conclusion.

We consider that several of the setting assessments do not clearly identify which design parameters are likely to give rise to the worst-case scenario. However, the inclusion of wirelines for both scenarios is helpful in illustrating the range of potential impacts and provides sufficient visual information to support our assessment of non-compliance with Policy GEN 6 of the National Marine Plan (NMP) and Policy 7 of National Planning Framework 4 (NPF4). Where relevant, we address individual predictions in our asset-specific comments below.

Post-consent Design Development

Post-consent design development is addressed in Appendix 15, Design Strategy. This explains that the final design for “the Project”, including all development areas and associated infrastructure, will be agreed with relevant stakeholders before the relevant consent conditions are discharged. The stated purpose is to ensure that *“the effects of the final scheme will never be greater than those of the [realistic worst-case scenarios] RWCS assessed for EIA purposes”* (page 14).

This process will include the production of a Design Specification and Layout Plan (DSLPL), confirming the location and dimensions of all turbines and the production of a Design

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Statement. The DSLP will be informed by the relevant design objectives set out in Table 3.1 (page 10). Section 2.4.2 of the Planning Statement also proposes a condition requiring this process (page 10).

Appendix 15 refers specifically to reducing impacts on “nationally important landscapes”. Both Appendix 15 and the Planning Statement also refer to consulting NatureScot as the design develops. However, it is unclear whether, and how, post-consent design development will take cultural heritage into account, or whether Historic Environment Scotland will be consulted. Given the likely significant effects predicted for multiple assets within our statutory remit, we would expect both cultural heritage considerations and consultation with Historic Environment Scotland to form part of this process.

As noted above, we consider that several of the setting assessments presented in Appendix 14.3 do not clearly identify which design parameters would give rise to the worst-case scenario. Despite this, the information provided within the EIA Report is sufficient for us to conclude that the proposed development would result in significant adverse effects on the settings of designated heritage assets and would therefore fail to accord with Policy GEN 6 of the National Marine Plan (NMP) and Policy 7 of National Planning Framework 4 (NPF4).

Should Scottish Ministers determine that the identified significant adverse effects on the settings of St Mary’s Abbey, Iona, monastic settlement (SM12968), and Iona Abbey (LB12310) are acceptable and grant consent for the Section 36 application and associated marine licences, we would require consultation on the Design Specification and Layout Plan (DSLP). Whilst this would not mitigate the significant adverse effects identified, it would provide assurance that the final turbine layout and design do not result in greater impacts on these assets than those assessed in the EIA Report.

Planning Statement

Section 5 of the Planning Statement provides the legislative and policy context for the proposed development, including [Scotland’s National Marine Plan](#) (NMP), National [Planning Framework 4](#) (NPF4) (Scottish Government, 2023), and other relevant policies and statements.

It explains that Chapter 11 of the NMP contains objectives and policies relating to offshore wind and marine renewables. However, we note that Chapter 11 of the NMP states that “*objectives and policies for this sector should be read subject to those set out in Annex B and Chapter 4 of this Plan*”. Chapter 4 includes **GEN 6: Historic Environment**, which is not listed in Table 5.1: *NMP General Planning Principles Relevant to the Consenting Applications*, within the EIA Planning Statement. Similarly, Annex 3 of NPF4 makes clear that its policies should be read as a whole.

Our comments below focus on the section of the Planning Statement that is directly relevant to cultural heritage (Section 6.2.5). We note that the [Historic Environment Policy for Scotland](#) (HEPS) is not discussed in the Planning Statement. Decisions affecting the historic environment should take HEPS into account as a material consideration. We would therefore have expected the Planning Statement to address how the predicted effects align with this policy.



Design and Mitigation

According to the Planning Statement, *“the project’s design evolution to date and embedded mitigation measures have reduced the effects of the project on designated assets as far as possible at this stage”* (page 55). As discussed above, the EIA Report does not appear to identify, discuss, or propose any embedded mitigation measures to address significant effects on setting.

The statement references embedded mitigation measure M-50 in relation to changes to the setting of heritage assets. However, M-50 in Table 14.13 of the cultural heritage chapter (Chapter 14) refers to “reconstruction ROV or diver surveys”. There does not appear to be any setting-specific embedded mitigation included within Table 14.13 of Chapter 14.

We therefore cannot agree with the statement that the project’s design evolution and embedded mitigation measures have reduced the effects of the project on designated assets as far as possible at this stage. In the absence of any clearly identified setting-specific mitigation measures, it is not evident how significant effects on the setting of heritage assets have been avoided or minimised through the design process.

National Marine Plan (NMP)

The Planning Statement interprets Policy GEN 6 to mean that *“the policy requirement is ... to avoid substantial loss or harm”* to designated heritage assets (page 55). This is based on the part of the policy that allows loss or harm in exceptional circumstances where it is necessary to deliver benefits unrelated to cultural heritage. It is an incomplete reading of the policy. We consider that, for the purposes of assessing the proposed development’s compliance with cultural heritage policy in the National Marine Plan, regard should also have been given to the requirement that *“designated assets should be protected in situ within an appropriate setting”*. In our view, the provisions relating to whether - having identified failure to satisfy the policy requirement regarding protection in situ within an appropriate setting - substantial loss or harm should be accepted in exceptional circumstances, is primarily a matter for the decision-maker.

The Planning Statement goes on to assert that *“harm to heritage assets is a policy concept that has been little used in Scotland but has been the subject of extensive consideration in England, and there is a body of guidance and case law that provides useful context for its discussion and makes it clear that substantial harm presents a high bar”*.

The first part of this statement is unsupported. It is also unclear which English guidance and case law are intended to provide context for the discussion that follows, as no sources are cited. The Planning Statement goes on to state that:

“The test of whether harm would be substantial is independent of valuation of the asset, and therefore reference to criteria used in the EIAR for establishing the magnitude of impact are relevant”; and

“As no effects arising through change to setting have been assessed as higher than a moderate magnitude of impact, it is therefore clear that substantial harm would not arise to any designated heritage assets. Therefore, the relevant requirements of the NMP are met and the consenting applications accord with policy GEN 6.”

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As previously explained, we disagree with the definition of a medium adverse magnitude of impact used in the cultural heritage assessment methodology, as we consider it disproportionately low in comparison with the high magnitude category and inconsistent with the approach set out in the [EIA Handbook](#). We discuss how this methodology has been applied in our asset-specific comments below, under the heading ‘Our Historic Environment Interests’.

It is also unclear why the value of a heritage asset (referred to as ‘importance’ in the assessment methodology matrix) should be disregarded when considering policy compliance. The conclusion that substantial harm would be avoided appears to rely on the assessment methodology itself, rather than on a clear explanation of how the significance of the affected assets and the nature of the predicted effects have been considered in policy terms.

We do not agree that the proposed development complies with policy GEN 6 in relation to St Mary’s Abbey, Iona, monastic settlement (SM12968), and Iona Abbey (LB12310). On this basis, **we object** to the proposed development as applied for under the Section 36 application and associated marine licence applications, because the settings of these assets would not be appropriately protected. As noted above, our detailed comments on the setting impacts on these assets are set out later in this response.

National Planning Framework 4 (NPF4)

We disagree with the applicant’s conclusions regarding compliance with the National Planning Framework 4 (NPF4), including the assertion that:

“Given the thresholds in relation to substantial harm are not met, it is therefore also concluded that the integrity of setting would not be significantly affected” for all assessed scheduled monuments.

This statement implies that conclusions regarding compliance with the National Marine Plan (NMP) can be directly applied to NPF4, without considering the specific requirements of Policy 7.

In considering the integrity of the setting of scheduled monuments, we apply the established definition that:

“Changes to factors of setting that contribute to cultural significance such that the understanding, appreciation and experience of an asset are not adequately retained will have a significant adverse impact on the integrity of its setting.”

This definition has been considered, discussed and accepted through appeal and public local inquiry processes and is published on [our website](#).

The proposed development would result in a significant adverse impact on the integrity of the setting of St Mary’s Abbey, Iona, monastic settlement (SM12968). As such, the development fails to meet Policy 7(h)(ii) of NPF4, which requires significant adverse impacts on the integrity of the setting of scheduled monuments to be avoided.

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The EIA Report also identifies significant effects on the settings of two category A-listed buildings, including Iona Abbey (LB12310), but these effects are not addressed in the Planning Statement. In the case of Iona Abbey (LB12310), the development would fail to meet the requirements of Policy 7(c) of NPF4, which states that development proposals affecting the setting of a listed building should preserve its character and special architectural or historic interest.

For these reasons, **we object** to the proposed development as applied for under the Section 36 application and associated marine licence applications.

ANNEX B

Our Historic Environment Interests

The proposed WDA infrastructure has the potential to adversely affect the setting of many designated assets within our statutory remit. Given the high number of sites that may be affected by the proposed development, this response does not provide comments on every asset. Instead, it sets out our detailed objection in relation to St Mary's Abbey, Iona, monastic settlement (SM12968), and Iona Abbey (LB12310). It also includes comments on other designated assets within our remit that do not form part of our objection, but for which the applicant has identified likely significant EIA effects.

We understand that an initial screening assessment was undertaken, corresponding to Stage 1 of the assessment process outlined in our Managing Change: Setting guidance. However, this assessment does not appear to have been included as an annex to Appendix 14.3: Settings Assessment. As a result, some of our comments below may relate to matters that were considered during that initial screening stage but are not available for us to review.

The combined assessment of the WDA, ECC and OnTDA in the cultural heritage chapter (Chapter 14) concludes that, as no surface infrastructure is currently proposed for the Offshore ECC, there would be no greater effects on the setting of heritage assets than those already identified in the WDA-only assessment (Chapter 14, page 116). We are content to agree with this conclusion and would welcome the opportunity to review and provide advice on the forthcoming applications and assessments for these elements.

St Mary's Abbey, Iona, monastic settlement (SM12968) and Iona Abbey (LB12310)

At a pre-application meeting with the applicant in December 2025, we highlighted that the monastic settlement and abbey at Iona have separate scheduled monument and category A-listed building designations. Based on the information provided at that stage, we considered that the proposed development had the potential to affect the ability to understand, appreciate and experience these assets.

Given the relationship between the two assets, we advised that the EIA Report should establish and describe their baseline settings and cultural significance in a holistic manner, while also considering the likely effects of the proposed development on each designation. We further advised that the assessment clearly reference the relevant policy and guidance requirements for scheduled monuments and listed buildings. To assist with this, we recommended following the staged assessment process set out in our Managing Change: Setting guidance.

Stage 1 of our Setting Guidance is to identify the historic assets that might be affected by the proposed development.

Our comments below first set out the history of St Mary's Abbey, Iona, monastic settlement (SM12968) and Iona Abbey (LB12310), together with the designated assets and undesignated features that contribute to their baseline settings and cultural significance, including artistic and intellectual associations.

We then establish the individual aspects of the settings of both assets in relation to their respective designations. This is followed by an assessment of the effects of the proposed development on those settings, including how the assets are understood, appreciated and experienced both individually and as interconnected elements of a wider historic landscape, in line with Stages 2 and 3 of the guidance.

We conclude by setting out the basis of our objection, explaining how the proposed development would result in significant adverse impacts on the settings of SM12968 and LB12310, and how this conclusion is supported by the National Marine Plan (NMP), National Planning Framework 4 (NPF4) and the Historic Environment Policy for Scotland (HEPS).

Identifying the Historic Assets

The religious complex at Iona contains the remains of a large early medieval monastic settlement founded by St Columba around AD 563, which was superseded by the now-restored medieval buildings associated with the Benedictine Abbey of St Mary founded around AD 1200.

One of the oldest and most important religious centres in Western Europe, and widely regarded as the birthplace of Scottish Christianity, the medieval monastery at Iona survives as a complex sequence of features and buildings added to and adapted over hundreds of years. The abbey was consolidated and then restored from the late 1800s onwards. It now houses an active and vibrant community. The efforts to restore the buildings were in no small part inspired by the recognition of its early origins, the association with St Columba, its impact on Scottish Christianity and Scottish and Irish Gaelic identity. These factors also help ensure its continued reverence and relevance within Scotland's national story, as does the presence of the Iona Community. These associations, together with its setting combines and contributes to its sense of place. Each element in Iona's history contributes to its significance. The site draws thousands of visitors annually from across the world.

The following section describes the history of both assets, together with the designated assets and undesignated features that contribute to their baseline settings and cultural significance, including artistic and intellectual associations. This provides context for the subsequent assessment of the proposed development's impacts on the settings of SM12968 and LB12310, both individually and as interconnected elements of a wider historic landscape.

St Mary's Abbey, Iona, monastic settlement (SM12968)

The scheduled area contains the remains of the early medieval monastery founded by St Columba and much of the wider complex associated with the later medieval abbey, including the footings of the abbey buildings.

St Columba's mission to western Scotland was based on his initial monastic foundation on Iona. Beginning under his guidance, over the next few centuries, the monastery grew to become a large complex of segregated and enclosed spaces, which itself referenced and became part of a complex of sites and monuments across Iona and beyond. There is some evidence to suggest the monastery was laid out over an earlier site.



A large, monumental bank-and-ditch, known as a vallum, initially constructed in the 6th or 7th centuries, encloses the site on all landward sides, with the seaward side bounded by a raised beach to the east. Parts of the vallum survive to a considerable height.

Early medieval written records suggest Columba's monastery contained a church; huts in which the monks worked and slept; a house or houses for guests; and a communal building (likely a kitchen and refectory). Another hut, Tòrr an Aba, situated in a higher place and used by Columba for writing, is also described. Outlying buildings, possibly lying beyond the vallum, included more functional agricultural buildings and dwellings and guest houses for those of low status. The buildings were likely mostly constructed of earth and timber, and the remains of this early medieval monastery now survive only as buried archaeology adjacent to, and probably beneath, the medieval abbey.

The centre of the site was the holiest part of the monastery, centred on St Columba's shrine chapel. In its original form it is the oldest building on Iona. Its foundations suggest a chapel dating to the 9th or 10th centuries, closely resembling some of the earliest Irish stone churches. Originally a detached building, it was incorporated into the Abbey in the mid-15th century and reconstructed in 1962. It is believed that this housed the relics of St Columba and may mark the saint's original burial place. It would have been the main focus of journeys of pilgrimage to the monastery. Burials, including that of Columba, were made throughout the centre of the site during the early middle ages. In front of the chapel and framing the core of the monastery sits a holy well and two remaining impressive high crosses, one of which is now a replica. Several other high crosses and cross bases have been found around this area, suggesting the monastery's core was marked by a concentration of these tall sculptures.

Just outside this cluster of features lies Tòrr an Aba: knoll of the abbot. Archaeological excavation of this small, prominent rocky outcrop has revealed the remains of a small single-celled building, now generally regarded as being the remains of Columba's writing hut mentioned in *The Life of St Columba*, a near-contemporary account of St Columba's life written by Adomnàn, the ninth abbot of Iona, in the late 7th century.

Columba was instrumental in introducing Christianity to the north and west of Britain, first to the Gaelic kingdoms of north-west Scotland, then extending beyond that into the lands of the Picts in north-eastern Scotland. In the 7th century the monastery on Iona played a leading role in the conversion of Anglo-Saxon Northumbria and attained primacy over the Pictish church of eastern Scotland. It held authority over a confederation of churches across Scotland and Ireland, becoming the most powerful of such bodies which emerged in Ireland during the late 6th and 7th centuries. For over two centuries, Iona was one of the most celebrated centres of Scottish and Irish Gaelic religious life.

During this period, Iona held international importance and was in regular communication with the Roman church, with monastic scholars from Iona visiting and influencing religious life and practice across Europe. It was also vulnerable to attacks by Vikings and was raided multiple times in the late 8th and early 9th centuries. In the 9th century, the main Columban community moved to Kells in Ireland and Columba's relics were transferred to Dunkeld, within the heart of the emerging Scottish kingdom. Whilst it retained its associations with the saint, Gaelic culture, and the conversion of Scotland, the Iona monastery and its community



continued as a centre of regional rather than international importance. Survival of a monastic community of the 'Celtic' type continued until the late 12th century.

After the monastery was passed to the reformed Benedictine monastic community, the new abbey buildings became the visual and spiritual focus of the wider monastic complex. Whilst the segregated spatial structure of the earlier monastery began to lose its relevance, the abbey drew inspiration and significance from the presence of the earlier church and its connection to St Columba. Many of the main features that formed the core of the earlier monastery were directly subsumed into the core of the new complex and were referenced by the abbey buildings. The area of the earlier monastery continued to be used to serve the new Benedictine monastic community, as farmland and presumably to house pilgrims and others more loosely associated with the running of the abbey.

The following subheadings describe notable features within the scheduled area of St Mary's Abbey, Iona Monastic Settlement (SM12968).

Sràid nam Marbh

Part of an impressively paved road or causeway is visible to the south of Tòrr an Aba, known as Sràid nam Marbh ('Street of the Dead'). This is the only visible section of a network of routeways leading to the monastery from the south, it was first constructed sometime between the 7th to 10th centuries. The road continued to Port nam Mairtir (Martyr's Bay) which is believed to have been the primary landing point for access to the monastery. A large, mounded feature at Port nam Mairtir, An Eala, contains at least 40 burials that are contemporary with the Columban monastery. The route from Port nam Mairtir to the monastery terminates at St Columba's shrine chapel, which is generally accepted as the central destination of a journey of ritualised Christian pilgrimage across the island, and which was later incorporated into the abbey. A series of medieval high crosses stand or stood next to this routeway. Pilgrims travelled to Iona along maritime routeways and across land, with crosses, chapels and portage sites across the Ross of Mull indicating a complex and regularised pilgrimage route for those that chose to come that way.

Reilig Odhráin

The Reilig Odhráin ('Oran's burial ground') named after St Oran, a cousin and contemporary of Columba, is traditionally believed to be the burial-place of the first kings of Scotland. Irish annals suggest Irish and Norse kings were buried on Iona from the 8th to 10th centuries, while other documents maintain that, throughout the 9th-11th centuries, Scottish kings were buried here. Many of the impressive collection of carved stones may have marked burials from this period. Accompanying these are many belonging to later medieval Gaelic lords. Most early and later medieval funerary monuments known from the monastery and later abbey were originally found in the Reilig Odhráin. The graveyard has continued in use since, most notably for John Smith, a prominent leader of the Labour Party, in 1994.

St Oran's Chapel

St Oran's Chapel, standing within the Reilig Odhráin, was built in the 12th century, but may incorporate an earlier chapel. The carvings over the entrance are of an Irish Romanesque style. It may have been built by Somerled, a Norse-Gaelic lord and the first King of the Isles, or his son Ranald, as a family mortuary or chapel. In the later medieval period, it served as



the burial-place of the MacDonald Lords of the Isles, descendants of Somerled. The south interior wall of the chapel contains a particularly ornate 15th-century tomb recess, likely belonging to one of the first Lords of the Isles.

St Mary's Chapel

This chapel was built sometime after the Benedictine abbey, but its function in relation to the latter is uncertain. A branch of the monastery's medieval road network swung past this building, suggesting it was used primarily by pilgrims visiting the abbey.

Tigh-an-Easbuig

Tigh-an-Easbuig, the Bishop's House, was intact but roofless in the later 18th century and ruinous by the middle of the 19th century. It dates from after 1499 and may be contemporary with the short-lived restoration of the abbey church as the Cathedral of the Isles in the 1630s.

Iona Abbey (LB12310)

Iona Abbey (LB12310) lies within the scheduled area of St Mary's Abbey, Iona Monastic Settlement (SM12968), but is separately designated as a category A-listed building.

The Benedictine abbey on Iona was probably founded by one of Somerled's descendants around 1200. With an impressive Romanesque church at its core, it is by far the largest and most elaborate ecclesiastical monument in the West Highland area, denoting the wealth, cultural connections, and aspirations of its patrons, the Kings of the Isles and later the MacDonald Lords of the Isles.

The buildings conform to a standard lay-out with the cloister being enclosed by an east range containing the Chapter House and monks' dormitory, a north range containing the refectory with the Abbot's House and reredorter located to the north and west range which was built in the 20th century replacing an earlier range that contained the kitchen. The remains of the bakehouse are visible to the west of this range. The front of the abbey enclosed and symbolically embraced St Columba's shrine. Its entrance aligns with the core of the earlier monastery, including the shrine, Tòrr an Aba and the high crosses at the end of the pilgrimage route. The frontage and entrance into the abbey were further accentuated by the height of the surrounding walls, stone sculpture, and architectural details surrounding the doorway and those around the windows above. These would have accentuated the entrance to the abbey as a backdrop to the group of features immediately in front of it and welcomed pilgrims to worship in the interior. It is noteworthy that the claustral ranges lie to the north of the church rather than the more conventional south (a church to the north, being the tallest structure, avoids blocking light and warmth to the cloister). This was probably done either to capture water from a nearby burn for the reredorter, or to avoid pre-existing areas of significance relating to the earlier monastery.

The church was built in the Romanesque style during the first two decades of the 13th century, probably by Irish stonemasons, with a cruciform layout. Prior to completion, the chancel was extended to form an aisled choir above a crypt. This likely reflected the growing community as domestic quarters were built as part of the cloistral complex in the



13th century. The use of dog-tooth ornament during this phase suggests that masons from eastern Scotland were present.

An enlarged south transept was proposed, possibly to house a crypt and occupy two storeys and/or to accommodate pilgrims viewing the church's relics; only the footing of the walls was laid before work was abandoned.

By the early 15th century, the church was in poor condition and major repair and alterations were undertaken. The east wall of the choir and the entire south wall of the church were demolished and rebuilt to provide a wider nave and choir, and a south aisle to the choir. The central tower and caphouse, one of the most impressive and visible features of the church, were built at this time. This work was likely overseen by Donald Ó Brolcháin, an Irish master mason, whose signature appears on one of the capitals of the crossing piers.

The church was embellished with fine traceried windows and rich carving, notably a frieze of religious and genre scenes decorating the capitals of the south choir arcade. The appreciation of foliate decoration as well as cusped ogee arches can be seen across the artistic output of Iona at this time; in the sedilia in the presbytery, in the canopied tomb in St Oran's and on the grave slabs. This highlights the influence of the Iona and West Highland schools of monumental sculpture.

Michael Chapel, which stands separate from the main body of the abbey, probably also dates to around 1200 and would have allowed worship to continue while the abbey was being constructed.

The abbey buildings became derelict following the Reformation in 1560, although attempts were made to retain its relevance within a reformed Gaelic church, patronised by the Campbells, who had eclipsed the MacDonald Lords of the Isles, and to a lesser extent by the MacLeans. The position of Bishop of Iona and the Isles was retained, and Columba reenvisioned as a practitioner of a pre-Catholic Protestantism. An attempt was made in the 1630s by bishop Neil Campbell on behalf of Charles I to restore the eastern parts of the church for use as a Cathedral of the Isles. The reuse of the church was short-lived as by 1693 it passed into the ownership of the Argyll family. Parts of the church building began to collapse in the 18th century, with the 3rd Duke of Argyll taking steps to protect the ruins. It was during this time that the existing boundaries of the abbey were established.

As early as the 18th century the Abbey, including its church, had gradually deteriorated into the romantic ruins beloved by visitors touring the Scottish Highland and Islands. Famous visitors included Walter Scott, William Wordsworth and Prince Albert and Queen Victoria (the latter staying/sketching from the boat). Iona became a place of antiquarian curiosity that inspired writers and artists.

A comprehensive restoration of the ruins was undertaken for the 8th Duke of Argyll in 1874-6 by the renowned architect Robert Rowand Anderson between 1874-6. In 1899, the Duke of Argyll donated the Abbey and other buildings to Iona Cathedral Trustees on the basis that the church would be restored as a place of worship. The abbey complex then underwent a sequence of restorations beginning in 1902. These were aided by leading Scottish conservation architects of the time including Thomas Ross, John Honeyman, and

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Peter MacGregor Chalmers. The Iona Community, established by Reverend George MacLeod, undertook restoration of the remaining abbey buildings began in the late 1930s, led by architect Ian G Lindsay, which was completed by 1965. The restoration work retained the raw masonry of the ruins to evoke connections to the original Benedictine abbey and Columba's earlier monastery.

Other Designated Assets and Undesignated Features

Cladh an Diseart (SM804)

Cladh an Diseart ('Burial ground of the Hermitage') is the remains of a small rectangular building, probably a chapel, set within an enclosure. The site's name suggests these remains stand on or close to the site of the 'dìsirt', a word evoking the desert hermits that exerted huge influence on early Christianity, whose practices Columba and many members of the Iona monastic community sought to emulate. This indicates that this site was a place of retreat for members of the community, and it was named in relation to the monastery in 1164. Although designated as a separate scheduled monument to the north of St Mary's Abbey, Iona Monastic Settlement (SM12968), it forms part of the wider monastic complex.

Cladh an Diseart is about 200m north of the monastery's outer vallum and below the raised terrace where the monastery was built. Its setting is marked by its separation from the larger monastic complex to the south. The sense of isolation is enhanced by the open fields surrounding it, and by the sea nearby, but the monastery can be seen to its south, visually connecting these two places of contemplation.

Iona Nunnery (SM90350)

The nunnery is a modest collection of buildings, built around three sides of a cloister, served by a small chapel included in one of the ranges. It was built shortly after the abbey, although slightly enlarged in the late 1400s, and closely associated with the same family of patrons. It is one of only two Augustinian nunneries in Scotland and probably only ever housed a small community. Excavations have recovered high status domestic goods associated with the later community. The community survived until the Reformation.

Amongst Iona's collection of later medieval carved stones are some of the few representations of medieval Gaelic women, including a Prioress.

Whilst one of the building ranges is well preserved the rest of the nunnery is now ruined and a large part tended as a garden providing a quiet retreat for modern visitors.

The nunnery is a dominant presence on the modern route from the ferry to the monastery, mirroring its place on historic routeways. Pilgrims and visitors see a relatively stark wall containing three small windows, one capped with a carving of a sheela-na-gig: an enigmatic yet provocative female figure. From the nunnery the monastery is highly visible and vice versa. This reciprocal visual referencing is likely to have been deliberate.

St Ronan's Church

Beside the nunnery stands St Ronan's Church, which is now contained within the same walled enclosure and forms part of the same designation. St Ronan's served as the later medieval parish church for the island's inhabitants but was built on the site of one of the



earliest dated chapels on Iona. It remained in use as a graveyard for women and children into the 18th century.

McLean's Cross (SM90173)

This 15th century cross, bearing ornate carvings in the West Highland style, is situated close to the junction of three medieval streets. Standing up to 3m high it marks the route between the coast and the monastery. It appears to have been commissioned by the MacLeans of Duart, who were increasing their powerbase in the area at the time.

Dún Í

This natural hill is the highest point on the island, despite being only 100m above sea level, and lies to the northwest of the monastery. Early medieval writing records it being visited by St Columba and his acolytes, where the saint notes a storm passing to Ireland and then performs a miracle to save those affected by the storm. From the top of the hill there are wide sweeping views across Iona, the Inner Hebrides and out over the sea beyond.

St Columba's Bay

St Columba is said to have landed on Iona at this bay on the south end of the island, before setting up the monastery to the north. It sits separate from the monastery and modern settlement and has been visited and venerated by visitors since at least the late 1600s. Small acts of worship and sculpture are visible around it. Its exposure to the sea and wide-open views southwards across the sea and towards Ireland accentuate Columba's connections to and separation from Ireland. It tells an important part of Columba's and the monastery's story.

Artistic and Intellectual Output

The artistic and intellectual output of the early medieval monastery on Iona is of international significance and most clearly articulated in the stone sculpture and texts of the early medieval period. Some of the earliest post-Roman texts written in the British Isles are likely to have been made on Iona. These include the *Cathach*, probably written in Columba's own hand; and the Book of Kells, the most elaborate and accomplished existing Hiberno-Saxon gospel book. It has been suggested that the Book of Kells was created to commemorate the 200th anniversary of Columba's death, or possibly the enshrinement of his remains about AD 750. Iona is also one of the earliest monasteries in Europe to produce annals. Scholars have also suggested that the Book of Durrow was written on Iona.

Adomnàn's *Life of St Columba*, probably written on Iona, is one of the most important surviving documents providing insights into early Scottish and Irish Gaelic history. A now lost *Iona Chronicle* that survives in fragments in other documents had a similar impact. Adomnàn's *Law of the Innocents* is cited as the first human rights document, which influenced all that followed – demonstrating the worldwide and continuing impact of the monastery.

Iona's collection of Early Christian carved stones is one of the largest in the British Isles and Ireland, surpassed only by that at Clonmacnois, in Ireland. Iona is likely the place of origin of the ringed or Celtic cross, a symbol now recognised globally. Iona's freestanding high crosses, three of which are reconstructed in the abbey museum, with a replica of one and



an original still standing in their original position, represent an early and experimental form of sculpture not derived from any tradition of established stone carving. Dating from the 8th and 9th centuries, these crosses were almost certainly carved on Iona. St John's Cross, the prototype ring-headed high cross, is the first of its kind anywhere in the world. These stood in front of St Columba's shrine and the abbey. Visible along the route into the core of the abbey, they served as a focal point for the pilgrimage, a point of prayer at the end of the journey and helped focus the transition into the holiest part of the monastery.

Inherent structural weakness led to the final and irreparable collapse of St John's cross in 1957. The existing category A-listed cross (LB52541) is a reinforced concrete replica erected in 1970. Its construction is a technical/engineering achievement and the cross itself is unique as a full scale, accurate replica in the same location as its original, early medieval predecessor.

Stone sculpture on Iona saw a resurgence during the 14th to 16th centuries in the form of West Highland grave slabs and effigies. Broadly associated with the Lords of the Isles, Iona has an exceptionally high concentration of about 150 grave slabs, many now located in the abbey museum and cloisters. The effigies represent either warriors or abbots, some identified by surviving inscriptions. They are an evocative symbol of Gaelic arts and culture.

Whilst earlier crosses also marked the route into the monastery from the landing point, the most impressive, surviving example, McLean's Cross (SM90173), belongs to this later period.

The sense of history and spiritual associations, connections to the Gaelic world and Columba, together with the living religious community at Iona, adds considerably to its cultural significance. As the birthplace of Scottish Christianity, it holds an iconic place in the national story and consciousness.

[Defining the Setting of St Mary's Abbey, Iona, monastic settlement \(SM12968\)](#)

The monastery of Iona was constructed on a relatively flat terrace sloping eastwards to the Sound of Iona. It is bounded by a raised beach to the east and craggy, low hills to the west. The close proximity of the Ross of Mull, with the Sound of Iona in between, strongly emphasises the island's distinct separation from the land around it. This sense of separation is reinforced by views up and down the sound, where the open ocean is strongly framed by the land on either side of it.

Perceived remoteness and the concept of spiritual and social isolation were important to the early church across the Christian world. While the monastery was constructed to evoke a sense of seclusion and remoteness, travel and journeying are nevertheless central to Iona's story. Columba travelled from Ireland to found the monastery, using it as a base to travel to even more remote island hermitages throughout the western seaboard, communicate with secular powers, particularly in Argyll, and to go on further to bring in others into the Christian fold. Pilgrimage became one of the core purposes of Iona, with countless pilgrims visiting the site in the centuries that followed. This practice continues today, with people of a variety of faiths and of no faith now visiting the monastery in varying acts of pilgrimage.



Whilst acting as a boundary, the sound simultaneously functions as a link, providing connections between Iona and the wider world. Crossing the sound is the final stage of an often-arduous journey for pilgrims and other visitors and heightens the anticipation of arrival.

Most travellers to Iona arrive on the Fionnphort ferry, across the sound, which has been used as a crossing point for visitors since the early medieval period. The modern-day journey to the monastery broadly mirrors this historical route of pilgrimage both in layout and experience. Crossing the sound elicits a clear sense of crossing a boundary and building anticipation. It also demonstrates Iona's separation from its surroundings, with the open ocean visible to the north and the south as the island is approached.

From the 7th to 9th centuries, Iona was monumentalised to create a complex devotional landscape defined by monastic enclosures, chapels, burial grounds, high crosses, and shrines. Recent research suggests that the liturgical landscape of the monastery on Iona was developed to mirror the heavenly Jerusalem in its layout. The journey along a paved roadway from the landing point, generally thought to be at Port nam Mairtir, to its terminus at St Columba's shrine chapel, provides a metaphor for pilgrimage to Jerusalem.

The modern tarmacked road running north through Baile Mòr, just to the north of Port nam Mairtir, broadly replicates the historic routeways that led to the monastery. The journey along this road was punctuated by various ecclesiastical buildings and monuments, with surviving elements including Iona Nunnery, St Ronan's Church, McLean's Cross, and St Oran's Chapel, before finally arriving at the site's core, focused on St Columba's shrine chapel. This journey is fundamental to the modern visitor's understanding, appreciation, and experience of the monument, giving a strong impression of the historic route of pilgrimage made by people in the medieval period.

The processional route ends in front of the abbey. With the establishment of the new Benedictine community, the abbey was deliberately placed at the sacred core of the earlier monastery. The impressive and ornate masonry abbey church and associated monastic buildings became a dominant visual focus from within and across the wider monastic complex. Drawing significance from the earlier church and its connection to St Columba, it incorporated and referenced many of the principal features of the earlier monastery. Together, the abbey and the core of the earlier monastery became, and remain, key visual and spiritual elements of the monument's setting. However, the connections to the earlier monastery remained significant.

Tòrr an Aba, probably the location of Columba's writing hut, gives views across most of the monastery and highlights its island context with the ocean visible to the north, east, and south. The view from Tòrr an Aba allows for an understanding of the clear sequencing of the pilgrimage journey from Port nam Mairtir, with the area of the ferry terminal, the Reilig Odhráin, St Oran's Chapel, Sràid nam Marbh and St Columba's shrine chapel all visible. The open ocean is framed in the view south by Mull's coastline and Iona's craggy interior: Sràid nam Marbh draws the eye in that direction, with St Oran's Chapel serving as a useful contextual marker beneath the horizon.



More widely, views south from within the core of the complex, across and out of the sound, look towards where Columba would have arrived from Ireland. It is also the route taken by pilgrims and modern-day visitors. The views out of the sound, over the sea to the horizon, accentuate the spiritual connections between Iona, western Scotland, and Ireland, and the strength of cultural and maritime connections. In many views from within the complex, St Oran's Chapel and St Martin's Cross are prominent, with the open ocean visible between or behind them, directly behind Sràid nam Marbh.

The modern road in the north of the island provides expansive views of the entire monastery in its wider context, with the Sound of Iona behind and the open horizon to the south. Visitors returning from the north of the island can gain a clear understanding of how the various components of the monastic complex relate to one another, as well as an appreciation of the site's evolution through time. The massive remains of the vallum stand to the right, while Tòrr an Aba, St Oran's Chapel and Tigh-an-Easbuig are all visible. The sea both frames these views and is framed by the surrounding landforms, clearly articulating the monastery's insular location and evoking both the sense of sea-girt separation from the world beyond and Columba's journey from Ireland beyond the horizon. This sense of separation is especially apparent from the eastern parts of the monastery, around the edges of the raised beach defining its eastern boundary, and from Cladh an Disear.

Iona was seen by its monks as being 'at the edge of the Ocean' and 'at the limit beyond which no-one dwells'. The monastery's sense of separation from the world around it can be most clearly appreciated from the higher parts of Iona, particularly Dùn Ì, from which the entire island is visible. The wide, open expanse of the Atlantic is visible in an arc from the south to the north. The *Life of St Columba* describes how Columba himself climbed Dùn Ì, where he witnessed a storm passing towards Ireland. The view across the monastery and the rest of the island is likely to be broadly similar to that which would be seen during Columba's lifetime.

As well as establishing the island's clear separation from its surroundings, views from Dùn Ì also give a clear outlook towards Columba's Bay at the south of the island and the open horizon, towards Ireland, beyond. Columba is traditionally said to have landed in this bay, choosing Iona for his monastery because Ireland was now no longer in sight. This tradition is first recorded in the 18th century and, while Ireland's invisibility from Iona may not have factored into Columba's motives for founding his monastery here, this story is closely associated with subsequent perceptions of his world view and links to Ireland. The wider views across the sea to the southern horizon are therefore an important part of the understanding, appreciation, and experience of Iona.

In addition to the sense of separation, outward views from the monastery are deeply impressive, with the expansive seascape, distant hills and dynamic skies contributing to their scenic quality. The absence of large-scale modern development contributes to this, and to the historic character of these views.

Key factors of the scheduled monument's setting include:

- Views towards Iona and the monastery when crossing the Sound of Iona.
- The monastery's coastal and island location.

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- Reciprocal views along the route between the monastery and Port nam Mairtir and Baile Mòr.
- The sense of perceived remoteness and separation from the outside world.
- The sense of being bounded by the sea, with wide open views out of the sound to the open horizon beyond.
- Views towards Ireland, hidden beyond the horizon.
- The reciprocal relationship with the abbey.
- Views between the various elements of the monastery, with the Sound of Iona and the sea beyond.
- Views across the monastery and its wider surroundings from the northern parts of the monument
- Views across the monastery and its wider surroundings from Cladh an Disear
- Panoramic views across the monument, Iona, the western horizon and seaboard from Dùn Ì.

Defining the Setting of Iona Abbey (LB12310)

As with the monastic monument, most travellers to Iona arrive on the Fionnphort ferry, across the sound which has been used as a crossing point for visitors since the early medieval period. The modern pilgrimage route broadly mirrors the historic approach. The abbey's increasing prominence along this route, first visible from Mull and then drawing closer during the sound crossing and approach through Baile Mòr, makes it an important landmark and the culmination of the journey.

The church assumes increasing visual prominence along the southern approach as distance and partially screened views are replaced, culminating in unobstructed views of the church upon arrival. This unfolding of views creates a sense of anticipation. The church's prominence, expressed through its robust architectural character including its massing, form, and distinctive features, such as the tower, communicates its architectural and historic importance within the site.

The processional route ends at what is now the abbey forecourt; this is a highly significant part of the site. Its importance is reflected in a number of features and structures of Early Christian origin, their antiquity and connection to St Columba adding to the sanctity of this space, including St Columba's Shrine Chapel; the high crosses of St John, St Martin and St Matthew; the well; the bullaun (prayer) stones; the trough known as the "Cradle of the North Wind"; and Tòrr an Aba. The high crosses not only monumentally demarcated the entrance to the centre of the site at the end of the pilgrimage journey, but they also provided a focus for prayer and meditation.

The front of the abbey encloses and symbolically embraces St Columba's shrine. Its entrance is aligned with the core of the earlier monastery, including the shrine, Tòrr an Aba, the high crosses and the end of the pilgrimage route, reinforcing the continuity of religious significance and activity across the site. As the abbey evolved from and incorporated the core of the earlier monastic settlement, the monastic site itself is a key component of the abbey's setting.



Views south from the core of the abbey complex, across and out of the sound, look towards where Columba would have arrived from Ireland. It is also the route taken by pilgrims and modern-day visitors. The views out of the sound, over the sea to the horizon, accentuate the spiritual connections between Iona, western Scotland, and Ireland, and the strength of cultural and maritime connections. In many views from within the complex, St Oran's Chapel and St Martin's Cross are prominent, with the open ocean visible between or behind them, directly behind Sràid nam Marbh.

From the front of the abbey, attention is also focussed east; towards St Columba's Shrine Chapel, the 'front' of the high crosses and the entrance elevation of the church. This east-facing direction follows the long-standing Christian tradition of orienting churches towards the rising sun, in expectation of Christ's resurrection. In these views, the Sound of Iona and the hills of Mull form the backdrop. This visually and symbolically connects the abbey to the east.

The church interior conveys the sombre and reverential character of the sacred space. Built as a place of worship, its design corresponds to its function; the church is orientated in the accepted direction of veneration with windows placed above eye-level to focus the monks (and visitors) attention on the altar in the presbytery. There is therefore a limited relationship between the interior of the church and outwards views.

Similarly, the design, position, and orientation of the cloister garth and conventual ranges provide inward-facing views. The architectural character of the abbey (as a whole) creates an enclosed, secluded and contemplative atmosphere that reflects internal monastic life. Outward views from east range buildings are limited to axial views to Mull due to their recessed position in relation to the abbey choir and the now museum building. The contrast between the abbey's enclosure/inward focus and open, coastal surroundings is part of the abbey's spatial experience.

Key factors of the listed building's setting include:

- Views towards the abbey when crossing the Sound of Iona.
- The abbey's coastal and island location.
- The abbey's increasing visual prominence along the approach.
- The role of the abbey as the culmination of the pilgrimage route.
- The reciprocal relationship with the monastic site.
- The visual and symbolic relationships with the Sound of Iona, Mull and the east.
- The relationship between the church and the cloistral buildings.

Shared Setting and Relationship Between SM12968 and LB12310

The medieval abbey precinct is now defined by a rectilinear enclosure of ha-has, which encompasses a smaller area than the early medieval monastery. The monastery had an outer vallum that extended much further north into what is now pasture between the abbey and Grianan. This feature remains clearly visible to the west and north-west as a massive upstanding bank and ditch, and its line can be seen continuing through the field north of the abbey. Views south across this area allow for the expansive size of the early medieval monastery, and its spatial contraction into a later medieval Benedictine foundation, to be



understood, appreciated and experienced. The Sound of Iona and the abbey are dominant in these views, with both the north and south mouths of the sound visible.

The modern road to the north of the island provides expansive views of the entire monastery in its wider context with the Sound of Iona behind and the open horizon to the south. Visitors today can appreciate this view when returning from exploring the north of the island and can gain a clear understanding and appreciation of how the various components of the monastic complex relate to each other, as well as the monument's evolution through time. The massive remains of the vallum stand to the right, with Tòrr an Aba, St Oran's Chapel, the reconstructed abbey, and Tigh-an-Easbuig all visible. The abbey, at the core of the monastery, dominates and provides a focal point in views down the coastline and over the open southern horizon. The sea both frames these views and is framed by the abbey and Cnoc nan Carnan, clearly articulating the monastery's insular location and evoking both the sense of sea-girt separation from the world beyond and Columba's journey from Ireland beyond the horizon.

This sense of separation is especially apparent from the eastern parts of the monastery, around the edges of the raised beach defining its eastern boundary, and from Cladh an Disear, where views emphasise the relationship between the monastery, the abbey, the Sound of Iona and the surrounding seascape.

Iona has seen a growth in settlement since the monastery was in use, mostly in the 19th - 21st centuries. In the main, this later development is small and largely domestic in scale and set low down or to the back of views out from the monastery, being largely clustered around the ferry port within Baile Mòr, alongside the roadside between it and the monastery or scattered to its west. It does not feature significantly in views out from Dùn Ì and is absent in views from St Columba's Bay. Although modern settlement is visible in some views, its limited scale, dispersed pattern and generally low-profile character mean that it does not substantially detract from the appreciation of the monastery or the abbey's historic or island setting.

In summary, the monastery is an unparalleled example of a medieval monastic foundation with religious activity spanning more than a thousand years. The evidence for its exceptional importance is enhanced by an exceptionally rich archaeological and historical record. The characteristics that made Iona a suitable location for a major monastic foundation can still be readily appreciated through views from, towards and across the monument. The rationale for placing the monastery here can be readily understood, appreciated, and experienced in a variety of views from, towards, and across it. Many of these views, including over the horizon towards Ireland, are themselves laden with deep historical significance and religious meaning.

The reconstructed abbey remains the visual and spiritual focus of the wider monastic complex, its prominence reinforcing its role as the culmination of the historic pilgrimage route and the centre of religious life on the island of both the monastery and the abbey. Iona's setting evokes the spirit of St Columba and possesses a powerful sense of place, created by the interplay of its landscape, seascape, archaeological remains and ecclesiastical buildings. This setting is fundamental to the cultural significance of both assets and is highly sensitive to change.

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Key shared factors of setting include:

- Reciprocal views between the abbey and the wider monastic complex.
- Views towards and out from the core of the religious complex, including the reciprocal relationship with the pilgrimage route and the crossing from and back to Mull.
- Views south across the Sound of Iona, including outwards towards Ireland and western Scotland.
- The site's coastal and island setting, and its relationship with the surrounding seascape.
- The sense of perceived remoteness and being bounded by the sea, with wide open views out of the sound to the open horizon beyond.
- The ability to understand the extent and evolution of the monastic complex through time, including the reciprocal relationship between the early medieval monastery and the later abbey.

Assessing the Impact of the Proposed Development

The EIA Assessment

The assessment of impacts on the settings of St Mary's Abbey, Iona, Monastic Settlement (SM12968) and Iona Abbey (LB12310) in Appendix 14.3 largely considers the two assets together. Impacts on both assets are assessed primarily under the scheduled monument heading on page 78, while the predicted magnitude of change and significance of effect for the listed building are addressed in a supplementary paragraph on page 144.

The applicant's assessment is largely contained within Section 1.6.1.5 of Appendix 14.3. In Paragraph 125, the applicant includes a list of key views identified by HES prior to the application being submitted. This appears to misunderstand the intent of our letter of 20 February 2026, which highlighted a number of setting factors that, based on the limited visualisations available at that stage, appeared likely to be affected by the proposals. The examples provided were not intended to represent a comprehensive assessment of the settings of either the scheduled monument or the listed building. The letter also emphasised the importance of considering the monastery as an interconnected whole, comprising a range of related features and places, rather than as a series of separate entities.

The applicant places a strong emphasis on HES's Statement of Significance for the Property in Care (the area it cares for and manages on behalf of Scottish Ministers), which articulates aspects of its cultural significance. While we encouraged the applicant to refer to this, the Statement of Significance relates only to the area in the guardianship of Scottish Ministers. This area is defined by the boundary wall around the Reilig Odhráin and the ha-ha enclosing the abbey. Additionally, whilst containing helpful information, Statements of Significance are produced to assist HES in the management of its estate. When considering proposals, we advocate a broader approach that considers all aspects of an asset's cultural significance and relies on the relevant policies and guidance for managing change in the planning system.

For instance, the applicant's assessment notes that the only view of importance mentioned in the Statement of Significance is that to the east across the sound to Mull and the

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direction where Christ is meant to arise on the day of judgement. This becomes the main focus for their assessment of impacts. This substantially underplays the complexity of the monastery's setting and contribution that wider views make to that.

The applicant suggests the historic act of pilgrimage is difficult to reconstruct. This seems to ignore the surviving historical and cartographic evidence and the pattern of surviving monuments that mark that journey.

The applicant's conclusions appear to rely on a very narrow interpretation of what constitutes a view. They seem to suggest that when looking at a specific feature it is only that feature which forms the view: they cite the view of St Columba's Shrine from Tòrr an Aba as an example. However, this does not reflect real world experiences. Views are framed by what lies around them, views change as people move around a site and, in the case of views out from Tòrr an Aba, there are a variety of related features to appreciate at any one time, where the viewer looks around, through and over the assets to appreciate them as a grouping within their setting.

Where the applicant refers to what they call the far horizon or the 'ever present sea' they emphasise this as a distant background to the 'principal foci of views'. They place a similar emphasis on specific views of features, such as the abbey in views from the ferry or the journey up from it, noting that the viewer would need to turn to perceive their wider surroundings of the location of the proposed development. However, an asset's setting is often perceived in the round, especially when moving around or where the wider views contribute to an overall sense of place.

Whilst acknowledging that the absence of the modern contributes to the sense of romanticism and spirituality, when assessing these views, the applicant focuses instead on the foregrounding of buildings and topography, suggesting that the prominence of buildings, modern infrastructure on the island and other landscape features restrict outward views. This over-emphasises the presence of modern settlement in these views and again ignores the contribution of wider and longer distance elements to these views.

When assessing impacts the applicant also appears to focus on what cannot be seen, regularly noting that half of the proposed development would be obscured, rather than the impacts of what would be visible and what the impacts of those might be.

The applicant acknowledges the symbolism of views towards Ireland for the monastery in that 'the sense of another place beyond the horizon becomes significant' but does not assess the proposals' impacts on this. When considering the impacts on the views from Dùn Ì, they again focus largely on the views towards the monastery and note that many of the other features referenced are not directly visible, seeming to dismiss the relevance of the panoramic views, the importance of the horizon and the associations with the locations not directly seen both in Iona and across it.

The applicant makes numerous references to intervening trees and buildings as screening parts of the proposals or otherwise reducing its impact. As noted in our [Managing Change: Setting](#) guidance, vegetation cannot necessarily be relied upon as screening as it is subject to felling and seasonal changes.

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Taken together, these aspects of the applicant's assessment downplay both the contribution of the wider setting to the monastery's and the abbey's cultural significance and the impacts of the proposals.

The applicant's assessment of the impacts on Cladh an Diseart is not clear. They seem to place an emphasis on the visitor experience of the asset group, noting, correctly, that there is no access provided to it. This appears to confuse access with the impacts on significance and/or setting. In this case its setting relies on its remoteness and separation from the rest of the monastery.

The applicant suggests that the proposals would not affect the relationship between Iona and Ireland because the latter cannot be seen and notes that views towards the abbey, and back from it towards Mull, would not be affected.

In conclusion, the applicant predicts a low adverse magnitude of impact, resulting in a moderate adverse significance of effect for both the scheduled monument and listed building, which is significant in EIA terms. Whilst we agree that the overall predicted significant EIA effect is appropriate, we disagree with the assessment of the setting of both assets and the conclusions about the proposals' potential impacts in relation to compliance with the National Marine Plan (NMP) and National Planning Framework 4 (NPF4).

The applicant has concluded that any difference in the effect between the two layouts (composed of either 91 and 144 turbines) on the setting of the scheduled monument would be limited, and that identifying any difference is challenging due to the distance between the proposals and the monastery. It seems unlikely that differences in height would be appreciated at this distance, but differences in layout would be perceived, through the spread, density and distribution of turbines, especially for the 144-turbine scheme. The potential impacts of this have not been assessed by the applicant. There is also no discussion of the worst-case scenario in relation to the listed building.

Our Assessment

Impacts on the Setting of St Mary's Abbey, Iona, monastic settlement (SM12968)

The proposals would result in changes to factors of setting that contribute to the cultural significance of the scheduled monument such that the understanding, appreciation and experience of the monument would not be adequately retained.

The information supplied in support of the application indicates that the proposals would be visible in their entirety for most of the ferry crossing from Fionnphort to Baile Mòr. SLVIA Figure 16.2.21 indicates that almost all of the scheme, including the substation, would be visible from Fionnphort as the journey across the Sound of Iona commences. Turbines would fill the empty horizon visible to the south and be framed by topography on either side of the sound. Figure 20 (Appendix 14.3) depicts a similar view from a position much closer to the slipway at Baile Mòr, demonstrating a similar level of impact when arriving on Iona. The currently open, empty horizon to the south would therefore be filled with turbines for the entirety of the ferry journey, undermining the sense of remoteness and separation of the monastery from the surrounding world. This would also disrupt its relationship with the absent Ireland articulated by the empty horizon.

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The proposals would be highly visible in reciprocal views when looking south and returning back from the monastery towards Baile Mòr. The turbines would be visible behind the nunnery on approaches to it from the north, detracting from the presence of both McLean's Cross and the nunnery in these views. This would also undermine the relationship between the landing points at Port nam Mairtir and Baile Mòr, and the monastery.

Cultural Heritage Figure 9 (Appendix 14.3) demonstrates that the proposals would be highly visible in views to the south from Tòrr an Aba. The turbines would appear in the carefully constructed visual relationship between this part of the monastery and Sráid nam Marbh, the Reilig Odhráin, St Oran's Chapel, St Columba's shrine chapel and the high crosses. By being prominently visible on the southern horizon in this location, the turbines would detract from these visual relationships, drawing the eye, while simultaneously disrupting the site's relationship with the absent Ireland on the currently-empty horizon.

Figures 10 and 21 (Appendix 14.3) depict similar levels of visibility in the views south, back along Sráid nam Marbh, and south from St Columba's shrine chapel respectively. As well as demonstrating the impact from these specific key viewpoints, the end of the medieval pilgrimage route and the most holy part of the monastery, they also help illustrate the likely levels of visibility when moving through the monastic complex, appearing in views from the front of the abbey, the high crosses in front of it, boundaries, chapels and routeways, with more turbines, and the substation platform, steadily coming into view as the viewer moves east. The turbines would be a constant presence out across the Sound of Iona, filling the currently empty horizon to the south.

As shown in Figure 11 (Appendix 14.3) the turbines would remain highly visible in views from the road north of the monastery, where they would be framed and accentuated by the abbey and the surrounding topography. They would be visible in views down the sound and out across the sea, towards Ireland, at this point where the entirety of the complex and its constituent parts are perhaps best appreciated. Figure 11a (Appendix 14.3) demonstrates similar impacts from the northern part of the monastery but closer to the shore, which is a good location to appreciate the complex and its relationship with the sea, in particular.

Similar levels of visibility also appear in the important views of the sea and the monastery from Cladh an Diseart, as shown in Figure 23 (Appendix 14.3). The turbines would appear to fill the open horizon to the south. This would undermine the sense of separation and perceived remoteness of the monastery; the sense of the monastery being bounded by the sea; and the evocative absence of Ireland articulated by the empty horizon.

Figure 16 (Appendix 16-4) demonstrates that, from the summit of Dùn Ì, the proposals would be visible in their entirety, dominating the view southwards across Iona on a horizon otherwise empty of any development. Similar impacts would be felt at St Columba's Bay.

By introducing large scale modern development across seaward views, the proposals would significantly detract from the open, maritime character of the island's surroundings and fundamentally alter the monastery's sense of remoteness. Across the monastery, the views southwards over the sea and towards Ireland, its absence laden with meaning, would be



interrupted and compromised, with the proposals filling an expansive area on the southern horizon.

The ability to understand, appreciate, and experience the choice by Columba and his monks to settle on a place at the edge of the ocean, and the edge of their known world would not be retained, nor Columba's deliberate sense of separation from Ireland. The sense of being bounded by the sea was a deliberate choice by St Columba and his followers and is a key part in contributing to the monastery's sense of remoteness and separation from the world.

The proposals would have a significant adverse impact on those factors of setting that contribute to the monument's cultural significance. The relationship between the monastery and its associated sites to the north and south would be undermined. The visual relationship between elements of the monastery would be compromised. The relationship between the monastery and the absent Ireland to the south would be disrupted. The sense of separation and remoteness, defined by the surrounding sea, would be undermined.

Consequently, the monument would not retain an appropriate setting, and the proposals would therefore be inconsistent with the objectives of Policy GEN 6 of Scotland's National Marine Plan (NMP).

These effects would also result in a significant adverse impact on the integrity of the setting of the scheduled monument, as changes to factors of setting that contribute to its cultural significance would mean that the understanding, appreciation and experience of the asset would not be adequately retained. The proposals would therefore fail to avoid significant adverse impacts on the integrity of the asset's setting, contrary to the requirements of Policy 7(h) of NPF4.

Impacts on the Setting of Iona Abbey (LB12310)

The proposed development would also have a significant adverse impact on key aspects of the abbey's setting, and therefore its architectural and historic interest. Whilst not appearing directly in views of the abbey buildings over the crossing or progressing up the route from Baile Mòr, turbines would be a near constant presence in the wider views, taking in the surroundings throughout the journey and when stopping at key points along it, affecting the wider setting through which the abbey is approached. For instance, they would appear over the sea and on the skyline across the open land to the south of the nunnery and from McLean's Cross.

Visible turbines would also affect important views between the abbey and the wider monastic complex. Cultural Heritage Figure 9 (Appendix 14.3) demonstrates that the turbines would appear within views from Tòrr an Aba towards Sráid nam Marbh, Reilig Odhráin, St Oran's Chapel, St Columba's Shrine Chapel and the high crosses. These relationships were later deliberately incorporated into the layout, frontage, and placing of the entrance into the abbey. After the monastery was passed to the reformed Benedictine community, the abbey and the area around its entrance became the visual and spiritual focus of the wider monastic complex, drawing significance from the earlier church and its connection to St Columba. Many of the main features that formed the core of the earlier monastery were directly subsumed into the core of the new complex and were referenced

by the abbey buildings. The presence of turbines within these views would therefore detract from the appreciation and understanding of the relationship between the abbey and the earlier monastic landscape.

Figures 10 and 21 (Appendix 14.3) demonstrate that turbines would be visible in views south from St Columba's Shrine Chapel and back along Sráid nam Marbh. They would also appear in views south from the front of the abbey, the high crosses in front of it, occupying the open southern horizon across the Sound of Iona.

The presence of turbines would adversely affect the abbey's visual prominence within its wider surroundings, including its relationship with the monastery, reciprocal views along the historic pilgrimage route culminating at the abbey, and the open maritime setting and coastal island context, all of which contribute to the understanding, appreciation and experience of the asset. Inward-facing views of the abbey complex, including those experienced between and behind the buildings, within the cloister, and from within the church interior, would remain largely unaffected. Static views towards the front of the abbey from the east would likewise not be disrupted.

The proposed development would therefore have a significant adverse impact on key factors of setting that contribute to the asset's architectural and historic interest and, consequently, its cultural significance.

As such, the proposal would be inconsistent with Policy GEN 6 of Scotland's National Marine Plan, which requires the settings of designated heritage assets to be appropriately protected.

It would also fail to meet the requirements of Policy 7(c) of NPF4, which states that development proposals affecting the setting of a listed building should preserve its character and special architectural or historic interest.

Shared Impacts on the Settings of SM12968 and LB12310

The proposed development would introduce a large-scale development across the currently undeveloped horizon in views experienced during the crossing to and from Iona, along the approach to the monastery and abbey, and in key views within, across and of the wider monastic complex, including reciprocal views between the abbey and the surrounding monastic landscape, where the abbey forms the visual focus. It would also be visible in views towards and out from the core of the religious complex, including its relationship with the pilgrimage route and the crossing to and from Mull. In addition, turbines would be seen in views south across the Sound of Iona, affecting appreciation of the site's coastal and island setting and its relationship with the surrounding seascape, including outward views towards Ireland and western Scotland.

The proposals would become an almost constant presence within the setting of both assets. The turbines would also be substantially out of scale against the scattered domestic-scale settlement in and the open rural character of Iona.

The deliberate sense of separation, seclusion, and remoteness sought by Columba in founding his monastery on Iona would be substantially undermined. Iona's ability to evoke



Columba's world; its spiritual connection to the Christianising of Scotland; Iona's place within Scottish and Irish Gaelic culture; and its place in the emergence of the Scottish Gaelic world – all of which are core to the national importance and cultural significance of the monastery and abbey – would be significantly detrimentally affected by the proposals.

The proposals would also adversely affect the ability to appreciate the development of the monastic complex through time. In important views from the north of the monument, where the relationship between the early medieval vallum, the wider monastic complex and the later abbey can be readily understood, the turbines would become a prominent new and detracting feature.

Taken together, these effects would have a significant adverse impact on the settings of both St Mary's Abbey, Iona Monastic Settlement (SM12968), and Iona Abbey (LB12310), and on the individual and shared cultural significance that they derive from their setting, including as part of a wider historic landscape. The proposals would fail to appropriately protect the settings of these designated heritage assets. Consequently, they would be inconsistent with Policy GEN 6 of Scotland's National Marine Plan.

In relation to the scheduled monument, the proposals would result in significant adverse impacts on the integrity of its setting, with changes to factors of setting that contribute to its cultural significance such that the understanding, appreciation and experience of the asset would not be adequately retained. As such, the proposals would be contrary to Policy 7(h)(ii) of NPF4. In relation to the category A-listed building, the proposals would fail to meet the requirements of Policy 7(c) of NPF4, which states that development proposals affecting the setting of a listed building should preserve its character and special architectural or historic interest.

We therefore **object** to the proposed development as applied for under the Section 36 application and associated marine licence applications.

Consequently, we do not consider that the applications demonstrate compliance with HEP1, as the assessment of the impacts of the proposed development on the setting of both assets does not adequately take account of their breadth and cultural significance. We also do not consider that the proposed development complies with HEP2 or HEP4, as the significant setting impacts identified above would detract from the understanding and enjoyment of these assets and would therefore fail to ensure that these qualities are secured for present and future generations. The proposed development would introduce changes to the assets' context that would not be managed in a way that protects the historic environment.

Oronsay Priory and Cross (SM287)

The monument is the ruins of an Augustinian priory founded either by Aonghus Óg Mac Domhnaill, Lord of Islay, or his son John I, Lord of the Isles, sometime between 1325 and 1353. It comprises a sequence of buildings constructed over the centuries that followed, including a church, cloister, conventual buildings, prior's house, and burial aisles extending into the 1500s, with some further burial enclosures added as late as the 19th century. The priory appears to have steadily fallen into disrepair after the Reformation, with sporadic references suggesting some ongoing religious activity until at least 1624. It was ruinous by

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1695. The Lords of the Isles may have founded the priory here due to an association of St Columba with Colonsay and Oronsay. A tradition that was not recorded until the 1700s suggests that this was believed to be where Columba first landed in Scotland, before travelling on to Iona (other places claim this accolade, but the island's location means this is tenable). The priory was also dedicated to St Columba, while the placename Oronsay is also associated with Oran, one of Columba's relatives and acolytes. This may, however, be a later misinterpretation of its original meaning. It is possible that there was an early medieval monastic community here; however, there is no obvious surviving evidence for this.

Setting

The priory overlooks much of the flatter, more fertile stretches of the southern half of Oronsay, with clear views south across much of Scotland's western seaboard. To the south and west, this land gives way to the wide, open expanse of the Atlantic Ocean. These views are important for understanding Columba's connection with both Ireland and Scotland, as well as the strong maritime foundations of the Lordship of the Isles. Important views include those from the sea towards the priory and the land around it, particularly around Port na Luinge and Port na Ròn, sheltered bays that were no doubt used to access the priory from the sea; and views towards the priory from the east, after crossing The Strand from Colonsay. The Strand is both a historic and current crossing between Colonsay and Oronsay, as is the road to the Priory, which also historically served as a coffin road.

As the only large building complex in its surroundings, the priory would have stood out as a solitary, visible statement, emphasising its religious purpose and reflecting the status of its patrons, the Lords of the Isles. Later farm buildings have been constructed immediately beside the priory and between it and the sea. These largely obscure the sea from view from close to and within the priory and reduce its visibility on approaches towards it from the sea. On approaches from the east, the priory is partly obscured by a row of cottages until the entrance gate is reached. However, the overall cluster of buildings is relatively modest in scale, and the tops of the priory's gables remain clear on the skyline in most inward views.

Dùn Domhnuill, a fort on Beinn Oronsay, may have been reused by the Lord of the Isles during the period when the priory was in use, with the relationship between the two sites therefore likely to have been of some significance.

Key factors of the monument's setting are therefore:

- Landward views towards it from the west
- Views towards it from the east
- Views out from it across Oronsay and Scotland's western seaboard.
- Views across the monument from Dùn Dòmhnuaill

The EIA Assessment

The monument's setting is poorly defined in the applicant's assessment given in paragraphs 62–66 of Appendix 14.3. The applicant accurately identifies that the monument progressively comes into view as it is approached from the east and that views out from it across the south-west, including towards Ireland, are important. However, there is no analysis of the historical context of the priory as a key religious site within the Lordship of



the Isles, or how this can be understood, appreciated, and experienced in its setting. This limited definition of the monument's setting means that the applicant's assessment of impact is correspondingly limited.

The applicant suggests that the existing farm buildings, west of the priory, surround it, and that they would obscure the visibility of the turbines. They state that the white render of Oronsay House draws the eye away from the priory buildings, which blend into the surrounding rocky landscape. They also state that the views from Beinn Oronsay do not reflect any functional or associative connection with the priory. We disagree with this assessment.

Our Assessment

The applicant's visualisations from the location of the MacDuffie Cross (Figure 19) and the access track (Figure 18) demonstrate that the proposals would appear prominently behind the monument in views towards it from the east, particularly from the important historic and modern approaches towards the priory. The turbines would appear prominent in views above the priory buildings when viewed from a distance, although those behind the priory would become increasingly obscured by the buildings closer to the monument.

The southern extent of the wind farm would, however, be consistently visible to the left of the priory on approaches to it from the east.

The result is that, whilst the wind farm would distract from and undermine the priory's presence in more distant views from the main landward approach, the effect on the monument's more immediate setting, where the complex of priory buildings can be fully understood, appreciated, and experienced, would be minimal.

Figure 4 depicts the view across the monument from an elevated position on Beinn Oronsay, approximately 300 m west of Dùn Dòmhnuaill. Given the distance and changes in elevation, it does not depict the impact on the important views of the priory from the fort, but it is a helpful indication. This visualisation suggests that most of the windfarm would appear on the horizon behind the priory in the views from Dùn Dòmhnuaill. While the proposals would distract from these views, the ability to understand, appreciate, and experience this relationship would remain broadly appreciable. Landward approaches from the sea would be unaffected.

Overall, the wind farm would be a constant presence in important key views associated with the priory, appearing either to one side of the priory or above the silhouette of the priory gables in views from further away, including from along the main approach. However, the priory and surrounding cluster of buildings, standing alone on the island plain, would remain the main focus of these views. Furthermore, the intimacy of the monument and its setting would be retained once close to and within the priory. On balance, whilst there would be significant impacts on some aspects of the priory's setting, the overall setting would be adequately protected.

Beinn a' Chaisteil, promontory fort and associated remains, Islay (SM13213)

The monument is the remains of a substantial promontory fort, occupying a distinctive coastal headland, and series of structures in the adjacent cleft below, situated on the north-

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west coast of Islay. The visible remains reflect at least two, and probably more, phases of use, the earliest of which is likely to be later prehistoric in origin (between 500 BC and AD 500).

The headland is surrounded by steep sea cliffs on all but the landward side, where the slopes descend to lower ground inland. The denuded remains of a single stone wall run along the landward side, enclosing the headland.

To the west of the headland, enclosed by cliffs on both sides, the land drops down to the sea, first through a cleft in the cliffs and then via a rocky valley. Near the top of the valley, but low enough to be hidden from inland views, a substantial drystone wall cuts across the lower slopes. It incorporates several features, including an impressive lintelled entrance passage. Another group of structures lies further downslope. These include a relatively well-preserved drystone corbelled building that appears to be of some age, together with a much more recent stone built hut. The massive form of the enclosure wall and the older corbelled structure are highly unusual, with few to no direct parallels.

As a result of this, and because of its evocative setting, the monument is highly enigmatic. Its date, use and function remain unclear, with interpretations comparing it to Iron Age monumental architecture, early medieval monastic hermit cells similar to those found along the western seaboard of Scotland and Ireland, and medieval or later seasonal houses more generally associated with the Outer Hebrides. While aspects of the site support each of these interpretations, none wholly explain all its features. Although the monument may represent multiple phases of occupation and use, it remains difficult to interpret with confidence.

Setting

The fort's construction on a prominent rocky headland provided an easily defended and/or enclosed position. Its positioning would have afforded commanding views across much of the western part of Islay, across an expansive moorland plain. Dun Bheolain is visible to the south, and both sites may have been in contemporary use. The relatively flat, lower-lying land stretching eastwards from the monument contains a number of broadly contemporary settlement and farming sites, indicative of communities living and working across this area during prehistory. The fort overlooks much of this land and consequently reciprocal views between the fort and these lower-lying areas, including the two nearby sheltered bays, are a key factor of its setting.

The settlement in the gully is hidden from inland views. Cliffs enclose it on both sides and the land drops to the sea through a series of cliffs and gullies. Together, the enclosing cliffs and the fall in ground towards the coast frame views of the sea beyond, particularly on entering the gully through the cleft in the cliffs above. The seclusion from inland, surrounding cliffs, rugged topography and drop to the coast make the sea an intimate yet dramatic part of its setting, reinforcing its sense of isolation. This setting is key to its interpretation and informs the various interpretations listed above.

The EIA Assessment

The applicant has identified various significant aspects of the monument's setting, including wide-ranging views out to sea, its inaccessibility, and its intervisibility with Dun Bheolain.

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However, they suggest that the monument's setting is limited largely to a "*generalised perception that this is a remote place that accords with modern perceptions of remoteness,*" and that "*little more can be determined than the fact that location of a promontory fort suggests past occupation and use*" (para. 84, Appendix 14.3). We disagree with this. The setting of the fort clearly demonstrates its strategic importance overlooking various parts of western Islay and its coast. The secluded, isolated nature of the remains situated within the gully can also be readily understood, appreciated, and experienced, despite the lack of certainty about the site's interpretation.

The applicant suggests that the importance of the sea to the monastic way of life is unclear and that any relationship with the sea can only be considered a general association, and peripheral to how the monument is understood, appreciated, and experienced. We also disagree with this. Evidence to support the importance of isolation and connections with the sea to monastic ways of life is detailed in our comments on Iona.

The applicant concludes that the proposals would not affect any understanding of the asset 'or its place in the landscape'.

The applicant identifies little difference in the impacts between the two turbine layouts, suggesting that the scale and prominence of the larger turbines in the 91-turbine layout would be offset by the effects of the denser arrangement of smaller turbines in the 144-turbine layout. Consequently, the applicant concludes that there would be no material difference in impact between the two layouts. We disagree with this. The comparative wirelines in Figure 5f (Appendix 14.3) suggest that the perceived difference in height between the turbines would be negligible at these distances, and consequently the denser layout of the 144-turbine scheme would have a greater impact.

Our Assessment

The proposals would be visible in their entirety from the fort on the summit of Beinn a'Chaisteil and would also be likely to be visible behind it in views from parts of lower inland ground. This would detract from the fort's perceived elevation and from what that elevated position may have signified about those occupying it. However, the turbines would not be overly prominent, and the majority of the panoramic view out from the fort would be unaffected. Any impacts on the fort's setting would therefore be unlikely to be significant.

Visualisations have been provided to show the proposals in seaward views from various points within the gully. Those from the lower-lying structures situated within the gully indicate that almost the entire seaward horizon would be filled with turbines. The visualisation from near the top of the cleft shows that turbines would be framed by the cliffs on either side.

While the presence of the turbines on the seaward horizon from lower down in the gully would affect the sense of seclusion that is such an important part of this monument's setting, there would be little to focus attention directly towards them, which would soften the level of impact overall.

The viewpoint above the gully on its landward side indicates that at this pinch point, where the sense of seclusion from the land is perhaps the most apparent, the turbines would be



framed by the cliffs, focusing attention directly on them. This would begin to undermine the ability to experience, appreciate and understand this element of the monument's setting, but the impacts would not be significant enough to warrant objection.

While the presence of turbines on the seaward horizon when viewed from lower down in the gully would affect the sense of seclusion that is such an important part of the monument's setting, they would be located at some distance and there would be little to focus attention directly on them. This would moderate the overall level of impact.

While the presence of the turbines on the seaward horizon would affect this sense of seclusion, it would still be readily understood, appreciated, and experienced through the high enclosing headlands flanking the site. This aspect would also be readily understood when looking towards the monument from the sea. The monument would therefore retain an appropriate setting for both its Iron Age features and the later remains in the gully below.

Dun Bheolain, fort, Islay (SM13214)

The monument is the remains of a substantial promontory fort occupying a distinctive coastal headland on the north-west coast of Islay. The visible remains reflect two or more phases of use, the earliest of which is likely to be Iron Age in origin (800 BC – AD 500). The headland is surrounded by steep sea cliffs on all but the south-east (landward) side, which rises towards the end of the headland in two distinct terraces. Two walls run across the two narrowest parts of the headland. The fort's interior comprises three distinct areas between summits and terraces. Several hollows and platforms are likely to represent the remains of dwellings or structures. Dun Bheolain is the largest promontory fort on Islay.

Setting

Like many of its type in Argyll, the fort occupies a distinctive coastal promontory with a seaward outlook to the west and excellent views southwards over the south-west coast of Islay. It lies very close to a neighbouring site, Dun nan Nighean, which occupies a smaller promontory immediately to the north. The monument has been constructed to demonstrate the power and influence of its inhabitants, while allowing them to exert a degree of control over its surroundings. Its construction on a dramatic and distinctive rocky headland provides an easily defended position, which establishes the fort as an obvious focal point. On approaches from the south, the headland's distinctive profile is visible for several kilometres. The fort's positioning would have allowed its inhabitants commanding views across much of the western part of Islay, which includes areas of good farmland, and the seaways along the coastline. Reciprocal views between the fort and these lower-lying areas and the seaways along the coastline are therefore a key factor of its setting.

The EIA Assessment

The applicant notes the headland's distinctive profile and accurately lays out the setting of the monument. Regarding the likely setting impacts, the applicant suggests that the views north from the monument, across Dun nan Nighean and Tràigh Bhàn towards Beinn a' Chaisteil, would be unaffected, with views towards the monument also unaffected. This is not supported by the supplied visualisations, which demonstrate that both of these key factors of setting would be affected (Figures 7 and 16, Appendix 14.3). The applicant also states that the proposals would not detract from the monument's prominence within its surroundings. Despite concluding that key factors of setting would be unaffected, the

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applicant concludes that the proposals would result in a major adverse significance of effect on the monument.

Regarding the possible difference in impacts between the two turbine layouts, the applicant takes a similar view to that given for Beinn a' Chaisteil, suggesting that the scale and prominence of the larger turbines in the 91-turbine layout would be balanced by the impacts of a denser layout of smaller turbines in the 144-turbine layout and that, consequently, there would be no difference in impact depending on layout. While the comparative wirelines for views out from the monument (Figure 7f, Appendix 14.3) suggest a broadly similar impact from both layouts, this is not the case in views towards the monument from the south. Here, the applicant suggests that the lower-lying land to the west of the monument would be insufficient to screen the smaller turbines of the 144-turbine layout from view, resulting in a similar impact to the 91-turbine scheme. However, Figure 16a (Appendix 14.3) demonstrates that more turbines would be seen immediately to the west of the monument in the 91-turbine layout.

Our Assessment

The full extent of the wind farm would be visible in views out from the monument. In views north across Dun nan Nighean and Tràigh Bhàn towards Beinn a' Chaisteil, the turbines would be highly visible; however, the proposals would not be directly behind these features and would, in terms of scale, appear recessive next to the dramatic landforms of Islay's west coast. The impact of the proposals on this key factor of setting would therefore be fairly limited. Views inland from the monument would be unaffected.

Figure 16 shows the turbines occupying the western horizon immediately adjacent to Dun Bheolain in views from the coastal plain to the south, detracting to some extent from the headland's distinctive, prominent profile. Overall, however, the proposals would not compete with the headland's considerable scale relative to its surroundings and, consequently, the monument's dominance over these surroundings. The 91-turbine layout would have a greater effect in this regard, but this still would not undermine this key factor of setting such that it cannot be adequately understood, appreciated and experienced.

Whilst the wind farm would be visible out to sea, the relationship with views of, and whilst travelling along, passageways along Islay's coastline would be largely unaffected.

Dubh Artach Lighthouse (LB12320)

The category A-listed lighthouse dates from the 1860s-70s and was built on a skerry in the Atlantic Ocean. Designed by David and Thomas Stevenson, it was constructed in response to continued shipwrecks in the area. Its special architectural and historic interest derives primarily from its industrial character, engineering ingenuity, visual prominence, and remote setting.

We previously advised that the proposed development could adversely affect the lighthouse's setting, and therefore its cultural significance, by reducing its prominence, particularly where views are interrupted by turbines during the day and where turbine lighting dilutes the effectiveness of the lighthouse light at night.



Based on their assessment, the applicant has concluded that the proposed development would be ‘significant’ in EIA terms; *“As such, this change to the setting will result in a medium adverse magnitude of change. For an asset of high sensitivity, this would give rise to a major adverse effect, which is significant in EIA terms”* (page 146 of Appendix 14.3). The justification for this is outlined in the preceding paragraphs beginning at 1.6.2.3.

The assessment of impacts on Dubh Artach Lighthouse does not explicitly refer to the three factors of setting or clearly explain how the proposed development would affect understanding, appreciation and experience of the asset. It also does not address how turbine lighting would affect its setting. Whilst we acknowledge that “night-time effects” on the lighthouse are briefly discussed on page 108 of the Seascape, Landscape and Visual Impact Assessment (Chapter 16), assessment of setting is distinct from the SLVIA, and predicted SLVIA effects cannot be assumed to result in corresponding setting impacts.

We also note that the assessment does not refer to the relationship between the lighthouse and the small tidal island of Erraid located off the southwest coast of Mull. This island acted as the shore station for both Dubh Artach and Skerryvore (LB17849). It contains a Category C-listed observatory (LB12309) which would have provided visual communication to the respective lighthouses.

We consider the visual and functional relationship between Dhu Artach and Erraid forms part of the setting of the lighthouse. Whilst this factor of setting does not form part of the assessment by the applicant, we do not consider it would alter the conclusion provided.

Despite the points above, the EIA Report contains sufficient written and visual information for us to conclude that, while the proposed development would result in a notable change to the setting of the lighthouse, it would not significantly affect our understanding, appreciation, or experience of the lighthouse and its cultural significance to a degree that would be contrary to Policy GEN 6 of the National Marine Plan, or Policy 7(c) of NPF4.

Historic Environment Scotland
11 September 2026