Member of Public 201

Objection To Spiorad na Mara Offshore Wind Farm
References: MD-00011742 & MD-00011743

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the marine licensing and Environmental Impact Assessment frameworks. The objection arises from a review of the Environmental Impact Assessment Report and accompanying documentation, which reveals significant deficiencies in planning, environmental, cultural, and procedural aspects. The development is sited off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, relatively unspoilt environment, and rich cultural heritage. The size, proximity, and design of the proposed wind farm raise serious questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis for a lawful determination. There are gaps in critical environmental data, and baseline information is both limited and inconsistent. Furthermore, vital components of the proposal remain unclear. The flexible design framework used obscures the understanding of potential significant effects, while the proposed mitigation measures, which have yet to be clearly defined, render an assessment of their effectiveness impossible. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and the claims regarding negligible or non-significant effects lack robust supporting evidence.

Policy conflicts are apparent and substantial. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not show that it can meet national obligations to protect biodiversity, climate interests, and environmental integrity. Such discrepancies are directly related to the statutory tests for consent and compromise the competent authority's capacity to deem the development acceptable from a policy standpoint.

The scale of the wind farm is unprecedented in this area, with large turbines situated close to the shoreline, raising critical concerns about landscape capacity, visual dominance, and environmental effects. The combination of insufficient information, reliance on vague mitigation strategies, evidential shortcomings, and clear breaches of

policy demonstrates that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application is reliant on an undefined design envelope, which raises significant concerns regarding its environmental assessment. Without commitment to specific turbine dimensions, layouts, or configurations, the proposal introduces considerable uncertainty. This lack of specificity compromises the integrity of the Environmental Impact Assessment Report, as it does not enable a consistent application of a worst-case scenario, hindering both the public and the competent authority's understanding of the environmental impacts that may arise from the development.

Furthermore, there is a troubling deferral of essential information regarding mitigation measures, monitoring strategies, and management plans, which have not yet been defined. Seeking consent on the premise that environmental harm will be addressed at a later stage precludes any meaningful evaluation of effectiveness or assessment of residual impacts. Such a practice is procedurally unacceptable and contravenes the purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation strategies must be clearly established before determination.

Evidential deficiencies are also present within the report, characterised by gaps in baseline data, limitations in methodology, and an over-reliance on assumptions rather than site-specific evidence. This situation results in uncertainty regarding the scale and significance of the impacts, particularly where conclusions of negligible or non-significant effects are drawn without robust supporting data. The lack of sufficient information hampers a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that cannot be reconciled with statutory requirements.

Consequently, the application does not meet the evidential threshold under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. The precautionary principle must be engaged, especially concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate compliance with National Planning Framework 4, including biodiversity protection and environmental integrity requirements, as it cannot be demonstrated that impacts have been thoroughly assessed or that suitable safeguards are in place.

In summary, the deficiencies arising from the reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data culminate in an unreliable and incomplete Environmental Impact Assessment Report. These

inadequacies impede a lawful and robust assessment of environmental effects and leave the competent authority unable to determine the application based on the information provided.

ASSESSMENT OF ALTERNATIVES

The inadequacy of the alternatives assessment is significant and fails to satisfy the statutory requirements outlined in the Environmental Impact Assessment regime. Instead of delivering a structured and reasoned evaluation of realistic alternatives grounded in environmental considerations, the application merely recounts the evolution of the project. This narrative fails to establish that less harmful alternatives have been duly identified, assessed, and selected in preference to solutions that may cause greater environmental damage.

There is a notable lack of a transparent and evidence-based analysis of alternative offshore locations, development scales, or design configurations. Specifically, the developer has not demonstrated that the possibility of situating turbines further offshore has been seriously evaluated, despite the likelihood that such a move would mitigate visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline, coupled with the critical importance of proximity to shore in assessing impact, makes the absence of this analysis particularly concerning. Consequently, it is impossible to conclude that the proposed siting is the least damaging option available.

This deficiency is further reflected in the assessment of cable routing and landfall options, where there is insufficient evidence that alternative routes have been adequately explored to avoid or reduce impacts on sensitive receptors, including culturally and spiritually significant sites such as Barvas Cemetery. The absence of a clear avoidance strategy, combined with the lack of comparative analysis, indicates that the principle of mitigation by design has not been appropriately applied. Rather, the application seems to rely on measures intended to mitigate after the design process.

As a result, the application does not convincingly demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This failure to adhere to the established mitigation hierarchy prevents the competent authority from determining whether less harmful and more suitable alternatives are available. The absence of a comprehensive assessment of alternatives also raises concerns about the sustainability and compliance of the proposal with relevant policies.

From a policy standpoint, this inadequacy compromises adherence to National Planning Framework 4, particularly regarding the protection of natural environments, cultural heritage, and community wellbeing. The lack of a structured comparative

assessment constitutes a material omission that contributes to the conclusion that the application lacks adequate evaluation and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The West Lewis coastal environment is highly sensitive and biologically active. However, the assessment of marine ecology and protected species fails to provide a complete and reliable understanding of ecological receptors in this area. The baseline data is incomplete, and the methodologies used do not adequately capture species presence, behaviour, and habitat use. Consequently, the assessment does not offer a sound evidential basis for evaluating potential impacts.

One significant oversight involves otters, a European Protected Species. The application does not properly recognise and assess their use of coastal areas for foraging and movement. This neglect of their core foraging range and behavioural patterns results in inadequate consideration of the potential effects of construction disturbance, noise, and increased activity. Such deficiencies undermine any conclusions about the absence of significant effects on otters.

In assessing basking sharks, the application relies on aerial surveys, which introduce significant detection bias, especially in Atlantic conditions. This method is likely to underestimate their presence, particularly when compared to established land-based observations showing frequent usage of these waters. The failure to incorporate relevant data leads to an incomplete baseline and diminishes the reliability of the conclusions reached.

Methodological shortcomings mean that conclusions of negligible or non-significant effects are based on assumptions rather than robust evidence. The lack of sufficient baseline data also hinders meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises questions about the actual level of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime or the National Planning Framework 4, as it fails to identify or assess protected species adequately. This level of uncertainty prevents the dismissal of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these conditions, it is not lawful to grant consent.

Overall, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These issues impede a

thorough evaluation of impacts on marine ecology and protected species and lead to the conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application fails to demonstrate that internationally important seabird populations will not be adversely affected, which puts it in direct conflict with national policy regarding biodiversity protection. The west coast of the Isle of Lewis is home to many seabird species, several of which are already in decline. The proposed development is situated within crucial foraging areas and migratory pathways, yet the assessment does not adequately evaluate the risks associated with displacement, collision, or habitat loss.

There is a significant contradiction within the application, as the developer asserts that there will be no significant adverse effects while simultaneously proposing a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This inconsistency raises doubts about the reliability of the ornithological assessment, revealing that its conclusions lack the necessary support from the available evidence. The assessment does not convincingly show that seabirds connected to protected sites such as the Lewis Peatlands and St Kilda will remain unaffected. The methodologies employed are likely to underestimate mortality, particularly given incomplete baseline data and the incomplete understanding of behavioural responses.

The positioning of turbines within a recognised migratory corridor presents an additional and severe risk, forming a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term consequences of sustained mortality in this corridor are not sufficiently addressed, nor are the potential impacts on species with smaller global populations.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data gaps and limitations in the modelling, means that the standard of beyond reasonable scientific doubt has not been fulfilled. This invokes the precautionary principle and prevents a lawful conclusion that supports consent.

The flaws identified in the assessment represent a failure to comply with National Planning Framework 4 regarding the safeguarding of natural assets. Collectively, these deficiencies result in an unreliable assessment due to internal inconsistencies, methodological weaknesses, and insufficient evidence. These shortcomings hinder a thorough evaluation of impacts and lead to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development fails to adequately assess cultural heritage and community identity, particularly concerning the West Lewis coastline, which is a living cultural landscape where environment, language, tradition, and community are interconnected. The application treats heritage as isolated and static rather than recognising its ongoing social, cultural, and spiritual significance within the community.

There is a significant deficiency in how culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are treated. These sites serve as active burial and spiritual places, yet they are mischaracterised as static features. This approach neglects their continued use and meaning, which impacts the understanding of development effects on their setting.

Additionally, the assessment overlooks intangible cultural heritage, including the Gaelic language, traditions, and the community's longstanding relationship with the coastal environment. These elements are essential to the area's identity, yet they are completely absent from the evaluation, which is a major omission. Without accounting for these factors, the cultural impacts of the proposed development cannot be fully understood.

There are also important concerns regarding community rights and engagement. The Gaelic-speaking population has a unique cultural identity recognised as part of Indigenous Peoples, but the absence of a Free, Prior and Informed Consent process undermines the validity of the assessment. This lack of meaningful engagement does not align with established principles of participation in decisions that affect cultural and environmental interests.

A critical procedural flaw is the lack of an Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. This assessment is necessary for the competent authority to evaluate the social, cultural, and economic effects on the island community. Its absence alone renders a lawful determination impossible.

From a policy standpoint, these shortcomings conflict with National Planning Framework 4, especially regarding the protection of historic assets and places. The failure to address both tangible and intangible heritage, as well as to acknowledge living cultural practices, signifies a clear deviation from policy requirements.

The overall result is a significant evidential gap due to the failure to assess living heritage, intangible cultural value, community rights, and statutory obligations. The cultural impacts of the development have not been adequately evaluated, and the

application lacks sufficient basis for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The procedural implications of the current application are substantial. The absence of the full Social Impact Assessment hinders the competent authority's ability to carry out a thorough socio-economic and health evaluation. This significant omission compromises the application's compliance with the evidential requirements set forth by the Environmental Impact Assessment regime.

Furthermore, the assessment of social impacts, health, and wellbeing is notably inadequate and lacks the necessary transparency for a lawful evaluation. Although the developer commissioned a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This gap in evidence prevents both the public and the competent authority from gaining a comprehensive understanding of the social risks highlighted by the developer's research.

Available summaries reveal that residents are currently experiencing measurable stress, anxiety, and concern stemming from the scale and proximity of the proposal. These impacts, drawn from direct engagement, are factual rather than speculative. The failure to disclose the complete assessment limits the opportunity for proper scrutiny of the findings, affecting the significance of these impacts in the decision-making process.

Additionally, there is evidence indicating that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" noted within the developer's own findings. Despite this, these impacts have not been adequately integrated into the main application or accorded the weight they warrant. The withholding of the full Social Impact Assessment obscures the genuine human and social cost associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A complete understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning may be compromised. The application fails to provide a comprehensive evidential basis to assess the balance between benefits and harm.

From a policy perspective, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Development must foster positive health outcomes while avoiding harm. However, the evidence presented indicates existing adverse effects that have not been fully disclosed, making it impossible to demonstrate compliance in the absence of the complete assessment.

In conclusion, the non-disclosure of the full Social Impact Assessment, along with the evidence of existing adverse impacts, results in an incomplete and unreliable assessment. This situation prevents a lawful determination, reinforcing the assertion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of the visual impacts, seascape, and landscape is insufficient and does not properly account for the significant changes or the sensitivity of the environment. The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and profound sense of remoteness. The proposed large-scale turbines situated near the shoreline would introduce a pervasive industrial presence, drastically changing this character and leading to an irreversible transformation of the landscape.

The application fails to accurately depict the extent of this visual alteration. Due to the scale and proximity of the turbines, they would dominate sightlines from residential areas, historic landmarks, and popular coastal spots. This would have a direct effect on visual amenity and diminish the essential qualities of naturalness and remoteness. The evaluation does not adequately express the significance of this impact within the context of such a delicate landscape.

Moreover, there are concerns regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that the viewpoints chosen may not fully represent the most sensitive receptors or the most adverse scenarios, especially concerning important cultural heritage sites and landscapes of high value. This raises the possibility that the severity of visual impact has been understated, which compromises the reliability of the assessment.

An additional shortcoming is the neglect to evaluate the interconnected relationship between the landscape, seascape, and cultural heritage. Key sites like the Calanais Standing Stones and other Scheduled Monuments form part of a broader landscape context, linked through visual and spatial connections to the Atlantic horizon. The assessment treats these as separate entities rather than acknowledging their interrelation, leading to a partial understanding of the impacts on their cultural significance and setting.

The industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are experienced and severing their link to the natural horizon. This not only constitutes a visual impact but also a broader cultural and spatial detriment that has not been thoroughly assessed in the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4 regarding the protection of natural areas and historical assets. The magnitude of change is incompatible with the obligation to preserve landscape character, visual amenity, and the settings of culturally significant locations. The lack of a comprehensive worst-case assessment further undermines any assertion of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be both dominant and inescapable. Consequently, the resulting alteration is fundamental and permanent, rather than something that can be reduced to an acceptable level through mitigation efforts.

In summary, the assessment does not accurately portray the extent of impact, the environment's sensitivity, or the interconnectedness of landscape and heritage. These shortcomings hinder a dependable evaluation and reinforce the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks associated with the proposal is significantly lacking in detail, which is essential for evaluating potential environmental effects. The planned activities include extensive seabed preparation and installation works in a challenging high-energy Atlantic environment. However, the application does not include comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are to be developed after consent is granted, hindering any meaningful assessment of their adequacy or effectiveness.

The lack of defined future measures is especially troubling in light of the sensitivity of the receiving environment. The West Lewis coastline is characterised by clean coastal waters and critical habitats that are susceptible to both sediment disturbance and contamination. While the application acknowledges risks related to sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate details on how these issues will be prevented, controlled, or monitored.

Moreover, there remains uncertainty about the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. In the absence of robust modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of these disturbances. This uncertainty also affects potential consequences for marine species and habitats that have already been identified as sensitive within the broader assessment.

The lack of specific emergency response procedures further exacerbates these issues. By postponing contingency planning until after consent, the application fails to allow for an evaluation of whether appropriate measures are in place to manage pollution incidents. This deferral introduces procedural risks and undermines the ability of the competent authority to assess the necessary environmental protection measures at the time of decision-making.

From a regulatory standpoint, deferring crucial environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation measures must be evaluated prior to consent, and without this information, a lawful determination cannot be made. Furthermore, the application does not demonstrate compliance with policy requirements pertaining to environmental protection and water quality.

In summary, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts culminate in an assessment that is materially deficient. These deficiencies obstruct a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents a range of significant deficiencies in its assessment of marine life and fisheries. There is an inadequate evaluation of the ecological and socio-economic effects related to the waters off the West Lewis coast, which are home to a diverse marine ecosystem and a thriving fishing industry. This assessment does not adequately address whether these habitats and activities can be safeguarded from disruption.

A major concern lies in the assumption that displacing fishing activity will not have adverse effects. The application fails to provide evidence that alternative fishing grounds are available and can handle the increased pressure. This lack of information is crucial, as the potential for overfishing in other areas could threaten the local fishing fleet's economic viability. Without a thorough and evidence-based evaluation, the impacts on fisheries and local livelihoods remain unclear.

Additionally, the proposal poses significant risks to marine species, particularly due to the underwater noise generated by construction activities. The anticipated use of high-energy hammer piling over a prolonged period is likely to disturb marine life across extensive areas, which includes species such as dolphins. The potential disturbance to a large portion of the local bottlenose dolphin population raises serious concerns, yet

the application minimizes these impacts without adequate justification.

There is a notable inconsistency within the application, acknowledging the need for licences to permit harm to European Protected Species while simultaneously declaring the impacts as negligible. This contradiction calls into question the reliability of the assessment and raises issues regarding compliance with the Habitats Regulations, especially where anticipated harm requires legal approval.

Moreover, the assessment overlooks the cumulative impacts that arise from multiple factors, including habitat disturbance, noise, and the displacement of fishing activities. A comprehensive analysis of these combined effects is necessary to determine the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not establish that the proposed development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, which undermines any assertion that the proposal aligns with the principles of sustainable development.

Overall, the absence of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the inconsistencies within the application result in an incomplete and unreliable assessment. These shortcomings hinder a proper evaluation of the implications for marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the offshore turbines in conjunction with the onshore infrastructure is materially inadequate, failing to recognise the interconnected nature of these components. The onshore works, which include cabling traversing protected moorland, the construction of a substation near Stornoway, and the necessary access infrastructure, are assessed separately, leading to a fragmented analysis that conceals the full scope of environmental and socio-economic impacts.

The onshore activities involve excavation across deep peat areas, particularly within Barvas Moor, a vital carbon store and ecologically sensitive region. The absence of a comprehensive evaluation of these impacts hinders a complete understanding of the project's overall environmental footprint. Furthermore, the omission or postponement of onshore impact assessments obstructs an accurate appraisal of cumulative effects. According to the Environmental Impact Assessment process, all project components must be considered collectively; however, the disjointed assessment of offshore and onshore elements results in an incomplete understanding of their combined effects on peatlands, habitats, and local communities.

Significant risks to sensitive habitats, such as machair systems and peatland environments, which are afforded policy protection, have not been adequately addressed in the application. There is insufficient evidence demonstrating that the potential impacts on these habitats have been thoroughly evaluated or that effective avoidance measures have been implemented, leading to a substantial evidential gap concerning biodiversity protection.

Additionally, the routing of infrastructure through active croft land poses potential conflicts with established land use and legal rights. The application lacks documentation indicating that the requisite consents or processes have been initiated, which raises concerns about the feasibility and lawful implementation of the project.

From a policy standpoint, the failure to assess the project in its entirety and to show that peatlands, habitats, and land use interests are adequately protected contradicts the stipulations of the National Marine Plan and National Planning Framework 4. The inability to prove that impacts can be avoided or mitigated further diminishes the validity of the application.

In conclusion, the division of project components, the lack of a thorough assessment, and insufficient evidence regarding environmental and land use impacts collectively render this section of the application incomplete and unreliable, thereby obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which play an essential role in shaping the area's environmental quality, cultural identity, and tourism value. The proposed introduction of permanent red aviation lighting would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment. This development does not assess the impact of such lighting on visual amenity, landscape character, or the experiences of residents and visitors. The omission is particularly concerning given the significance of dark skies to the local identity and the growing astro-tourism sector.

Furthermore, the application fails to evaluate the impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are highly sensitive to artificial lighting, which can disorient them and increase their collision risk. No lighting impact assessment or phototaxis study has been included, resulting in a lack of understanding of how aviation lighting may affect these species or contribute to increased mortality rates.

The situation is exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not account for nocturnal activity or associated risks. Other species, such as Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this vulnerability has not been addressed. The lack of site-specific night-time data creates a significant gap in comprehending the ecological impacts of the proposal.

Without a thorough assessment of nocturnal impacts, it is impossible to determine whether protected species or designated sites might face adverse effects. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt cannot be satisfied, invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission contradicts the National Planning Framework 4 regarding the protection of natural places and environmental quality. It also undermines the overall assessment of landscape and seascape impacts, as the character of the night-time environment is a fundamental aspect of the ecosystem.

In summary, the lack of any evaluation of dark skies and nocturnal wildlife represents a substantial evidential gap. The absence of baseline data, impact modelling, and species-specific analysis makes the application incomplete and unfit for supporting a lawful determination.

TOURISM

The application presents a materially deficient assessment of tourism impacts, neglecting to evaluate the economic and social repercussions for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. While it is acknowledged that 86% of visitors are attracted by the scenery, the assessment fails to quantify how the proposed large-scale offshore infrastructure would influence visitor numbers, behaviour, or the overall economic contribution of this sector.

Tourism on the Isle of Lewis has experienced substantial growth, increasing from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. Nevertheless, the application does not evaluate how the anticipated industrialisation of the seascape and the potential loss of environmental quality might affect Tourism Gross Value Added or the broader economic resilience of the area. In the absence of this analysis, it remains unclear whether the proposed development would yield a net economic benefit or jeopardise a well-established and expanding sector.

Furthermore, the assessment overlooks the crucial role that environmental quality plays in tourism, particularly the significance of unspoiled landscapes and dark skies for visitor experiences, including emerging markets like nature-based tourism and astro-tourism. The omission of a Dark Skies Assessment exacerbates this shortcoming, creating a considerable gap in understanding the impacts on a recognised and growing segment of the local economy.

In an island community characterised by limited economic diversification, the lack of a thorough impact assessment on tourism holds broader implications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been evaluated as mandated under the Islands (Scotland) Act 2018.

From a policy perspective, the application does not demonstrate compliance with National Planning Framework 4, especially regarding economic impact and the requisite to show a net benefit. It also contradicts strategic objectives that identify tourism as a priority growth sector, lacking sufficient evidence for the competent authority to assess the economic consequences of the proposal.

Altogether, the failure to quantify tourism impacts, to evaluate environmental drivers of visitor behaviour, and to consider the economic dependency of the island culminates in a significant evidential gap. This deficiency hampers a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria of sustainable development, as assessed against statutory duties, national policy, and evidential standards. This application mirrors the principal issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, which was rejected due to unacceptable industrialisation. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the current application still falls short.

There are significant gaps in the evidential basis necessary for determining the application. The use of an undefined design envelope, the reliance on unspecified mitigation measures, and the omission of essential impact pathways—including those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism—further undermine its validity. Consequently, the Environmental Impact Assessment lacks completeness, preventing an accurate understanding of likely significant effects or residual impacts.

Moreover, procedural deficiencies are evident, notably the absence of a compliant Island Communities Impact Assessment, which breaches statutory duty under the Islands (Scotland) Act 2018. The failure to fully disclose the Social Impact Assessment represents a material omission, impeding the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These shortcomings deem the application unfit for determination.

The application also stands in direct contradiction to National Planning Framework 4. It fails to demonstrate adequate protection for biodiversity, natural places, and cultural heritage, lacks evidence that health and wellbeing impacts are acceptable, and cannot substantiate a net economic benefit, particularly due to the absence of tourism impact modelling. Furthermore, the cumulative effects of both offshore and onshore elements have not been adequately assessed, clouding the evaluation of impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are both incomplete and inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been achieved, thus invoking the precautionary principle and precluding any lawful conclusion that impacts are acceptable.

This proposal would bring about substantial and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, loss of dark skies, disruption of cultural and visual relationships, and negative impacts on tourism represent permanent consequences that cannot be effectively mitigated.

In summary, the application is procedurally and substantively unfit for determination. The multitude of information deficiencies, coupled with policy conflicts and unresolved environmental risks, obstruct a lawful and evidence-based decision. The competent authority is therefore urged to refuse consent on these grounds or to invoke the relevant regulatory provisions to demand the submission of the missing information.

Consequently, a formal request is made for the refusal of the application for the Spiorad na Mara Offshore Wind Farm in its entirety.

Member of Public 202

Objection To Spiorad na Mara Offshore Wind Farm
References: MD-00011742 & MD-00011743

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted in accordance with the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a thorough review of the Environmental Impact Assessment Report and its supporting documentation, which reveals significant deficiencies in material planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, relatively untouched environment, and rich cultural identity. Concerns regarding the scale, proximity, and design of the proposal raise questions about its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application presents an inadequate evidential basis for lawful determination. There is a notable absence of critical environmental data, limited and inconsistent baseline information, and significant aspects of the proposal remain undefined. The use of a flexible design framework obscures the understanding of potential significant effects, and reliance on unspecified mitigation measures renders their effectiveness unassessable. Consequently, the documentation fails to provide a comprehensive or informed understanding of environmental, cultural, or community impacts, with claims of negligible or non-significant effects lacking robust evidence.

Substantial policy conflicts are evident, with the proposal appearing misaligned with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This is particularly relevant to biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate that it can meet national requirements to safeguard biodiversity, climate interests, and environmental integrity. These conflicts are directly linked to the statutory tests required for consent and compromise the ability of the competent authority to deem the development acceptable from a policy standpoint.

The unprecedented scale of the proposal, with large turbines located in close proximity to the shoreline, raises significant concerns regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear non-compliance with policy illustrates that the application is incomplete and cannot

support a lawful determination. In light of these factors, the precautionary principle must be applied.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment related to community identity and cultural heritage is fundamentally flawed and fails to recognise the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply interwoven. The application adopts a simplified view, treating heritage as a collection of static assets rather than acknowledging their dynamic social, cultural, and spiritual roles within the community.

A significant shortcoming is evident in the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites of burial and spiritual practice, yet the assessment reduces them to mere static features, neglecting their ongoing use, significance, and the implications of development on their surroundings. This mischaracterisation leads to an inadequate evaluation of cultural effects and overlooks their integral role in community life.

The assessment further neglects to address intangible cultural heritage, including the Gaelic language, traditions, and the long-standing connection between the community and the coastal environment. These elements are essential to the area's identity but are completely excluded from the evaluation, representing a considerable oversight. Without acknowledging these factors, the cultural impact of the proposed development cannot be accurately assessed.

Concerns extend to community rights and engagement as well. The Gaelic-speaking population embodies a unique cultural identity akin to that of an Indigenous People, yet no process of Free, Prior and Informed Consent has been pursued. This lack of meaningful engagement compromises the assessment's credibility and fails to adhere to recognised principles of participation in decisions that impact cultural and environmental interests.

A further critical procedural error is the omission of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The absence of this assessment prevents the competent authority from fulfilling its legal duty to evaluate the social, cultural, and economic impacts on the island community, thereby rendering a lawful determination impossible.

From a policy standpoint, these shortcomings place the proposal in direct conflict with National Planning Framework 4, especially concerning the safeguarding of historic assets and places. The neglect to consider both tangible and intangible heritage,

coupled with the failure to recognise living cultural practices, represents a clear deviation from established policy requirements.

Collectively, the failure to assess living heritage, intangible cultural value, community rights, and statutory obligations creates a substantial evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application does not present a sufficient foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency regarding the Social Impact Assessment significantly undermines the evaluation of social impacts, health, and wellbeing associated with the proposed development. Although the developer engaged local residents through focus groups, the absence of the complete report creates a substantial evidential gap. This omission hinders both public understanding and the competent authority's ability to assess the full scope of social risks identified in the developer's own research.

Residents are already reporting measurable levels of stress, anxiety, and concern due to the size and proximity of the proposed development. These reactions stem from direct engagement with the community and are therefore rooted in reality, not speculation. However, without access to the full assessment, proper scrutiny of these findings is impossible, which limits the assessment of their significance in the decision-making process.

Furthermore, there is evidence indicating that the proposal poses a threat to community identity and cohesion, with "cultural loss" highlighted in the developer’s findings. Despite these identified impacts, they have not been adequately reflected in the application nor given appropriate consideration. The failure to disclose the full Social Impact Assessment obscures the actual human and social costs of the development.

The implications of this lack of transparency extend to the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is critical for projects of this magnitude, especially when community character and function may be at stake. By not presenting the complete dataset, the application lacks a solid evidential foundation for weighing benefits against harm.

From a policy standpoint, the application does not comply with the National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and avoid causing harm, yet the evidence available points to existing adverse effects that remain undisclosed. Consequently, without the full assessment, compliance with this policy cannot be substantiated.

The procedural implications are profound. The competent authority cannot perform a comprehensive socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This represents a significant omission in the application and a failure to meet the evidential standards required by the Environmental Impact Assessment framework.

In summary, the non-disclosure of the full Social Impact Assessment, along with the evidence of current adverse impacts, makes the assessment incomplete and unreliable. This prevents a lawful determination and highlights that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and strong sense of remoteness. The application for large-scale turbines in close proximity to the shoreline would introduce a continuous industrial presence, fundamentally altering this character and resulting in a permanent transformation of the landscape. The assessment of seascape, landscape, and visual impacts is materially deficient and does not sufficiently represent the scale of change or the sensitivity of the receiving environment.

There are significant concerns regarding the methodology employed in the selection and presentation of visual viewpoints. Evidence indicates that the viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, especially in relation to cultural heritage sites and valuable landscapes. This raises the possibility that the magnitude of visual impact has been understated, which undermines the reliability of the assessment.

The application also fails to examine the interconnected relationships between landscape, seascape, and cultural heritage. Notable sites, including the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape setting linked to the Atlantic horizon. The assessment treats these sites as isolated entities without acknowledging their interdependence, leading to an incomplete understanding of the impacts on their setting and cultural significance.

Furthermore, the industrialisation of the seascape would disrupt these relationships and alter the context in which heritage assets are experienced. This not only represents a visual impact but also entails broader cultural and spatial harm that has not been sufficiently evaluated within the application.

From a policy perspective, the proposal contradicts National Planning Framework 4

regarding the protection of natural places and historic assets. The scale of change is incompatible with safeguarding landscape character, visual amenity, and the setting of culturally significant sites. The absence of a robust worst-case assessment further weakens the claim of compliance with policy requirements.

Finally, it is evident that the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would ensure their dominant presence, making any change fundamentally permanent rather than reducible to an acceptable level through mitigation. Collectively, these deficiencies highlight the failure to accurately represent the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage, reinforcing the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposed development raises significant concerns regarding the incomplete assessment of construction and pollution risks, which fails to provide adequate detail for evaluating potential environmental effects. Given the substantial seabed preparation and installation works proposed in a high-energy Atlantic environment, the absence of fully developed Construction Environmental Management Plans and Pollution Prevention Plans is alarming. The application places reliance on mitigation and contingency measures that are to be prepared post-consent, which hinders any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures is especially troubling considering the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it does not sufficiently detail how these risks will be prevented, controlled, or monitored.

Further compounding these issues is the uncertainty regarding the scale and behaviour of sediment plumes that may arise from seabed disturbance and cable installation. Without robust modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty extends to the potential effects on marine species and habitats that have already been identified as sensitive within the broader assessment.

Moreover, the lack of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning until after consent, the application prevents a thorough evaluation of whether appropriate safeguards are in place to address pollution events. This introduces procedural risk and undermines the ability of

the competent authority to assess the necessary environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of critical environmental safeguards contradicts the requirements set by the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation strategies are assessed prior to consent, and the absence of such information renders a lawful determination impossible. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, detailed management plans, and the uncertainty surrounding potential impacts create a materially deficient assessment. These shortcomings impede a thorough evaluation of construction and pollution risks and support the conclusion that the application is incomplete.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is defined by its exceptionally dark skies, which are crucial for environmental quality, cultural identity, and the burgeoning tourism sector, particularly astro-tourism. However, the proposal under consideration includes permanent red aviation lighting that would be visible over long distances, resulting in a continuous and intrusive “wall of light” effect across the western horizon. This would fundamentally disrupt the night-time environment, yet the assessment of dark skies and nocturnal wildlife is entirely absent from the Environmental Impact Assessment.

Significantly, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experience of both residents and visitors. The omission is particularly concerning given the vital role dark skies play in the area's identity. Furthermore, the lack of consideration for nocturnal wildlife is alarming. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are known to be sensitive to artificial lighting, which can lead to disorientation and an increased risk of collision. Without a lighting impact assessment or phototaxis study, the application does not address how aviation lighting might affect these species or contribute to increased mortality rates.

This issue is aggravated by an over-reliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activities and associated risks. Kittiwakes, which may forage or migrate at night, also face disorientation due to artificial lighting, yet this risk remains unassessed. The absence of site-specific night-time data creates a substantial gap in understanding ecological impacts.

Without an evaluation of nocturnal effects, it becomes impossible to ascertain whether

protected species or designated sites could be adversely impacted. The evidential standard necessary to rule out adverse effects beyond reasonable scientific doubt cannot be achieved, invoking the precautionary principle and hindering a lawful determination.

From a policy perspective, this omission contradicts the National Planning Framework 4 regarding the safeguarding of natural places and environmental quality. It further diminishes the comprehensive assessment of landscape and seascape impacts, as the character of the night-time environment is a vital component of the overall landscape.

In summary, the failure to assess dark skies and nocturnal wildlife results in a significant evidential gap. The lack of baseline data, impact modelling, and species-specific analysis renders the application incomplete and incapable of supporting a lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the criteria of sustainable development when evaluated against statutory obligations, national policy, and evidential standards. It mirrors the core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. This latest application is now presented within a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

The evidential basis provided by the application is neither complete nor reliable. There are notable deficiencies in baseline data, reliance on an undefined design envelope, and unspecified mitigation measures. Additionally, the application overlooks crucial impact pathways, including those affecting nocturnal wildlife, the complete onshore infrastructure, and tourism implications. Consequently, the Environmental Impact Assessment is incomplete, hindering a thorough understanding of potential significant effects and residual impacts.

Furthermore, there are distinct procedural shortcomings. The lack of a compliant Island Communities Impact Assessment breaches statutory duties as outlined in the Islands (Scotland) Act 2018. The omission of a comprehensive Social Impact Assessment further compounds these issues, obstructing the competent authority from effectively assessing the impacts on community wellbeing, cultural identity, and economic resilience. These inadequacies are enough to deem the application unsuitable for determination.

The proposal stands in direct opposition to the National Planning Framework 4, failing to

demonstrate adequate protection for biodiversity, natural places, and cultural heritage. It does not provide evidence that health and wellbeing impacts are acceptable, nor does it show a net economic benefit due to the lack of tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore components has not been conducted properly, which obscures understanding of effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks are not only uncertain but potentially significant as well. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, inconsistent with each other. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful conclusion regarding acceptable impacts.

Additionally, the proposal would lead to considerable and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual relationships, and the impacts on tourism entail permanent effects that cannot be mitigated to an acceptable level.

In light of these numerous and serious concerns, the application is both procedurally and substantively unfit for determination. The scale of information gaps, alongside conflicts with policy and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority must either refuse consent on these grounds or invoke the appropriate regulatory measures to compel the submission of the missing information.

Therefore, I formally request that the application for the Spiorad na Mara Offshore Wind Farm be entirely refused.

Member of Public 203

Objection To Spiorad na Mara Offshore Wind Farm
References: MD-00011742 & MD-00011743

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted in accordance with marine licensing and Environmental Impact Assessment procedures. The objection arises from a careful examination of the Environmental Impact Assessment Report and its supporting documentation, highlighting significant planning, environmental, cultural, and procedural shortcomings. The development site is situated off the west coast of the Isle of Lewis, an area known for its Atlantic-facing coastline, relatively unspoiled environment, and rich cultural heritage. Concerns are raised regarding the proposal's scale, proximity to the shoreline, and overall design, which may not align with statutory requirements, national policies, or the tenets of sustainable development.

The application is deficient in providing an adequate factual basis for a lawful decision. Important environmental data is absent, baseline information is both limited and inconsistent, and critical components of the proposal remain unclear. The flexible design framework utilised creates challenges in comprehending potential significant effects, while the dependence on unspecified mitigation strategies means that their effectiveness cannot be evaluated. Consequently, the documentation fails to furnish a comprehensive or informed understanding of the environmental, cultural, or community ramifications, with assertions of negligible or non-significant effects lacking robust evidential support.

Substantial policy inconsistencies are evident. The proposal does not appear to align with the National Marine Plan, the Environmental Impact Assessment framework, or National Planning Framework 4, especially regarding biodiversity, natural environments, cultural heritage, and public health and wellbeing. It does not adequately demonstrate compliance with national mandates to safeguard biodiversity, address climate concerns, and maintain environmental integrity. These discrepancies directly affect the statutory tests necessary for consent and compromise the capability of the competent authority to ascertain the development’s acceptability under policy frameworks.

The proposal's unprecedented scale at this location, with large turbines placed near the coastline, raises significant concerns about landscape capacity, visual impact, and overall environmental consequences. Together, the lack of comprehensive information, reliance on undefined mitigation measures, evidential deficiencies, and clear policy

violations suggest that the application is incomplete and cannot support a lawful determination. In light of these factors, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is significantly lacking, as it does not deliver a comprehensive, transparent, or dependable overview of the potential environmental consequences of the proposal. The flexible Project Design Envelope employed in the application, which lacks definitive turbine dimensions, layouts, or configurations, creates notable uncertainty. This lack of specificity compromises the application of a worst-case scenario and diminishes the assessment's integrity, making it impossible for both the public and the competent authority to grasp the true scale of the environmental impacts.

Moreover, the application places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Consequently, consent is being sought with the expectation that environmental harm will be mitigated at a later stage. This approach hinders any substantial evaluation of the effectiveness of such measures or the assessment of residual impacts. Deferring critical information to post-consent phases is procedurally inappropriate and contravenes the intent of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation measures are clearly identified prior to any decision-making.

There are also crucial gaps in the evidence presented, including insufficient baseline data, methodological constraints, and an overreliance on assumptions rather than site-specific evidence. This leads to uncertainty about the scale and significance of the impacts, particularly where assertions of negligible or non-significant effects lack robust supporting data. The lack of adequate information inhibits a thorough understanding of cumulative and worst-case impacts and introduces scientific uncertainty that is incompatible with statutory obligations.

As a result, the application does not satisfy the evidential requirements stipulated under the Habitats Regulations to demonstrate that adverse effects can be excluded beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not comply with the National Planning Framework 4, which includes obligations pertaining to biodiversity protection and environmental integrity, as it fails to demonstrate that impacts have been fully assessed or that sufficient safeguards are in place.

In summary, the combination of reliance on an unspecified design envelope, the absence of defined mitigation measures, and the gaps in baseline data render the

Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings obstruct a lawful and thorough evaluation of environmental impacts, thereby leaving the competent authority unable to make an informed determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives presented in the application is fundamentally inadequate and does not satisfy the statutory requirements of the Environmental Impact Assessment regime. A structured and reasoned comparison of feasible alternatives based on their environmental effects is lacking. Instead, the application offers a narrative account of the project's evolution, which does not effectively demonstrate that less harmful options have been identified, assessed, and selected in preference to more damaging solutions.

There is a clear absence of transparent and evidence-based comparisons concerning alternative offshore locations, development scales, or design configurations. Notably, the application fails to show that the developer has genuinely considered positioning turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be diminished. The sensitivity of the West Lewis coastline is a critical factor, and the importance of proximity to shore in determining impact cannot be overstated. The lack of such analysis means that no conclusion can be drawn that the proposed siting is the least damaging option available.

These shortcomings are evident in the cable routing and landfall assessment as well, where there is inadequate evidence that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors. This includes significant areas of cultural and spiritual importance, such as Barvas Cemetery. The absence of a clear avoidance strategy, along with the lack of comparative analysis, signifies that mitigation by design has not been effectively applied, leaving reliance on post-design mitigation measures.

Consequently, the application does not adequately demonstrate that environmental harm has been minimised through site selection, layout, and infrastructure routing. This failure to adhere to the established mitigation hierarchy prevents the competent authority from understanding whether more appropriate and less harmful alternatives are available. Without a comprehensive assessment of alternatives, the proposal cannot be deemed a sustainable or policy-compliant solution.

From a policy standpoint, this deficiency undermines compliance with National Planning Framework 4, particularly regarding the protection of natural places, cultural heritage, and community wellbeing. The lack of a structured and comparative

assessment is a material omission that leads to the overall conclusion that the application has not been adequately assessed and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally inadequate, failing to provide a complete and reliable understanding of the ecological receptors within the West Lewis coastal environment. This area is notably sensitive and biologically active, yet the baseline data presented is incomplete, and the methodologies employed do not effectively capture the presence, behaviour, and habitat use of various species. Consequently, there is a lack of sound evidential basis for evaluating potential impacts.

A significant oversight in the assessment pertains to otters, which are classified as a European Protected Species. The application does not adequately recognise or assess their active utilisation of coastal areas for foraging and movement. This neglect extends to their core foraging range and behavioural patterns, resulting in an inadequate evaluation of the potential effects related to construction disturbance, noise, and increased activity. Such oversights compromise the conclusions drawn regarding the absence of significant effects on this species.

Moreover, the assessment of basking sharks is deficient, with a reliance on aerial surveys that introduces considerable detection bias, especially under Atlantic conditions. This approach is likely to underestimate their presence, particularly when compared to established land-based observations that indicate frequent use of these waters. The failure to include or appropriately consider such data results in an incomplete baseline and significantly undermines the reliability of the conclusions reached.

The limitations in methodology lead to conclusions of negligible or non-significant effects being based on assumptions rather than solid evidence. Additionally, the lack of sufficient baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and interactions within the wider ecosystem. This creates uncertainty regarding the true risks posed to marine species and habitats.

From a regulatory standpoint, the application does not comply with the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify or assess protected species. The level of uncertainty introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt, which necessitates the application of the precautionary principle. In light of these factors, consent cannot be lawfully granted.

In conclusion, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These deficiencies impede a robust evaluation of impacts on marine ecology and protected species, contributing to the overall determination that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment associated with this application is deeply flawed, presenting significant gaps in evidence and inconsistencies that undermine its conclusions. It is critical to acknowledge that the west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application fails to demonstrate convincingly that these species will not suffer adverse effects. The development sits within essential foraging areas and migratory pathways, yet the assessment does not adequately evaluate the risks of displacement, collision, or habitat loss.

A glaring contradiction arises within the application, where the developer asserts there will be no significant adverse effects while simultaneously submitting a Habitats Regulations derogation case, which is only warranted when significant harm is anticipated. This inconsistency raises serious doubts about the assessment's reliability, indicating that its conclusions lack the support of the necessary evidence. The assessment falls short of providing sufficient proof that seabirds linked to protected sites such as the Lewis Peatlands and St Kilda will remain unaffected. The critical nature of these feeding grounds is not thoroughly considered, and the reliance on modelling methods introduces uncertainty, particularly for declining species like Kittiwakes and Fulmars. The methodologies employed risk underestimating mortality rates, especially given the incomplete baseline data and the lack of understanding regarding behavioural responses.

Moreover, placing turbines within a recognised migratory corridor introduces a considerable risk, effectively establishing a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term consequences of ongoing mortality in this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential threshold necessary to affirm that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, paired with data deficiencies and modelling shortcomings, indicates that the standard of beyond reasonable scientific doubt has not been reached. This situation invokes the precautionary principle,

ultimately preventing a lawful conclusion in favour of consent.

The identified deficiencies also suggest non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The failure to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct opposition to national policy.

In summary, the assessment is fundamentally unreliable due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. These shortcomings impede a thorough evaluation of impacts and lead to the overarching conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposal critically underestimates the assessment of cultural heritage and community identity, failing to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. It adopts a simplistic approach, viewing heritage merely as isolated, static assets rather than acknowledging their ongoing social, cultural, and spiritual relevance within the community.

Particularly troubling is the inadequate treatment of significant cultural sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These are not just static features; they are vital spaces for burial and spiritual practice. However, the assessment neglects to consider their continued use and meaning, as well as the development's potential impact on their surrounding environment. This failure leads to an incomplete understanding of cultural effects and dismisses their importance to community life.

Moreover, the application overlooks intangible cultural heritage, including the Gaelic language, various traditions, and the enduring relationship between the community and the coastal environment. These elements are integral to the area's identity and are entirely omitted from the assessment, representing a critical gap. Without accounting for these factors, the cultural ramifications of the development remain inadequately explored.

Concerns also arise around community rights and the necessity for engagement. The Gaelic-speaking population embodies a unique cultural identity with recognised traits of an Indigenous People, yet no process of Free, Prior and Informed Consent has been conducted. This lack of genuine engagement diminishes the credibility of the assessment and fails to adhere to established principles regarding participation in decisions that affect cultural and environmental matters.

Additionally, the absence of a compliant Island Communities Impact Assessment is a major procedural shortcoming, as mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission in itself precludes a lawful determination.

From a policy standpoint, these shortcomings place the proposal at odds with the National Planning Framework 4, especially concerning the safeguarding of historic assets and locations. The neglect to address both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, signifies a blatant disregard for policy requirements.

In summary, the neglect to evaluate living heritage, intangible cultural value, community rights, and statutory responsibilities results in a substantial evidential gap. The cultural impacts of the development have not been thoroughly assessed, and the application fails to deliver a solid foundation for understanding the true cultural cost associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The non-disclosure of the full Social Impact Assessment is a critical failure that compromises the integrity of the application. The competent authority cannot conduct a thorough socio-economic and health evaluation without this essential information, resulting in a material omission that undermines the evidential requirements set by the Environmental Impact Assessment regime.

Available summaries suggest that residents are already facing significant stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts stem from direct engagement with local residents and are not mere speculation. However, the lack of access to the full assessment hinders appropriate scrutiny of these findings, thereby limiting the ability to assess their significance in the decision-making process.

Additionally, evidence indicates that the proposal poses a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's own research. Despite this, such impacts have not been adequately incorporated into the main application or considered with the seriousness they warrant. The failure to disclose the complete Social Impact Assessment obscures the true human and social costs associated with the development.

This transparency issue also undermines the Environmental Impact Assessment

process, as a comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly when they may affect community character and functionality. The application does not provide a complete evidential basis for evaluating the balance between benefits and harm.

From a policy standpoint, the application falls short of demonstrating alignment with National Planning Framework 4 concerning health and wellbeing. Development should facilitate positive health outcomes and mitigate harm, yet the existing evidence points to adverse effects that have not been fully disclosed. Without the complete assessment, it is impossible to prove compliance with this policy.

In summary, the deficiencies stemming from the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing adverse impacts, culminate in an incomplete and unreliable evaluation. This situation precludes a lawful determination and reinforces the assertion that the application is not backed by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual, landscape, and seascape impacts is significantly flawed, failing to capture both the extent of change and the sensitivity of the environment. The West Lewis coastline is characterised by an expansive Atlantic horizon, a lack of development, and a strong feeling of remoteness. The addition of large-scale turbines near the shore would establish a persistent and overwhelming industrial presence, fundamentally transforming this unique character and leading to a permanent alteration of the landscape.

Moreover, the application does not sufficiently depict the scale of the visual changes anticipated. The size and closeness of the turbines would dominate views from residential areas, historic sites, and popular coastal spots, directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment inadequately conveys the significance of these impacts within such a sensitive landscape.

Methodological issues also arise regarding the choice and presentation of visual viewpoints. Evidence suggests that the viewpoints selected may overlook the most sensitive receptors or fail to address worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This could result in an underestimation of visual impact, calling into question the credibility of the assessment.

Another significant oversight is the lack of evaluation regarding the interconnectedness

of landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape setting that visually and spatially relates to the Atlantic horizon. The assessment fails to acknowledge their interdependence, treating them as isolated assets, which leads to an incomplete understanding of the impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these vital relationships, altering the context in which heritage assets are experienced and severing their connection to the natural horizon. This not only constitutes a visual impact but also inflicts broader cultural and spatial damage that has not been thoroughly assessed in the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4 concerning the safeguarding of natural areas and historic assets. The degree of change proposed is inconsistent with the requirement to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertion of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. The size, height, and proximity of the turbines would render their presence dominant and unavoidable. Consequently, the resulting change is fundamental and permanent, rather than being reducible to an acceptable level through mitigation efforts.

In summary, the assessment fails to accurately depict the magnitude of impact, the sensitivity of the environment, and the intertwined nature of landscape and heritage. These shortcomings hinder a dependable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment related to construction and pollution risks is notably inadequate, failing to deliver the necessary detail to evaluate the likely environmental effects. The project entails considerable seabed preparation and installation operations in a high-energy Atlantic environment, yet it lacks comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that are intended to be developed after consent, thereby hindering any meaningful assessment of their sufficiency or effectiveness.

This reliance on unspecified future measures raises significant concerns, particularly due to the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. Although the application recognises risks such as sediment

mobilisation and the possibility of accidental chemical or oil spills, it does not adequately outline how these risks will be prevented, managed, or monitored.

There exists uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without thorough modelling and clearly articulated management strategies, it remains impossible to ascertain the extent, duration, or ecological ramifications of these impacts. This uncertainty also encompasses potential effects on marine species and habitats that have already been identified as sensitive in the wider assessment.

The lack of detailed emergency response procedures further exacerbates these issues. By postponing contingency planning until after consent, the application obstructs the ability to evaluate whether suitable safeguards are in place to address pollution incidents. This introduces procedural risk and undermines the capacity of the competent authority to assess environmental protection measures effectively at the time of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant likely effects and mitigation must be evaluated before consent is granted, and the absence of such information renders a lawful determination impossible. Additionally, the application does not prove compliance with policy requirements pertaining to environmental protection and water quality.

In summary, the combination of undefined mitigation measures, the absence of detailed management plans, and uncertainty regarding potential impacts culminates in a materially deficient assessment. These deficiencies obstruct a thorough evaluation of construction and pollution risks, reinforcing the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are vital, not only for their diverse marine ecosystem but also for the active fishing industry that thrives there. However, the application in question fails to adequately assess the ecological and socio-economic impacts, raising profound concerns about the preservation of these critical resources. It is evident that the current evaluation does not sufficiently protect or maintain the existing habitats and uses of these waters, which is alarming.

A significant flaw within this proposal is the assumption that fishing activities can be relocated without any repercussions. The absence of evidence regarding the availability or suitability of alternative fishing grounds is particularly troubling. This oversight could

lead to overfishing in other areas, potentially jeopardising the livelihoods of the local fishing fleet. Without a thorough and evidence-based examination, understanding the true impacts on fisheries and the communities that depend on them is impossible.

Moreover, the proposal presents considerable risks to marine species, especially due to the underwater noise generated during construction. The extended use of high-energy hammer piling is predicted to disturb marine life across considerable distances, including species like dolphins. The potential disruption to a notable portion of the local bottlenose dolphin population is a serious concern, yet the application significantly downplays these effects without adequate supporting evidence.

There is also a troubling inconsistency in the application, as it acknowledges the requirement for licences to allow harm to European Protected Species while simultaneously claiming that the impacts are negligible. This contradiction calls into question the reliability of the assessment and raises issues related to compliance with the Habitats Regulations, particularly when anticipated harm may require legal authorisation.

Furthermore, the assessment neglects to consider the cumulative impacts of multiple factors, such as habitat disturbance, noise, and the displacement of fishing activities. Without an encompassing evaluation of these combined effects, one cannot ascertain the overall impact on marine ecosystems and the socio-economic conditions tied to them.

From a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not show how the proposed development can coexist with current marine users or avoid detrimental impacts on marine biodiversity, making it impossible to conclude that this proposal aligns with sustainable development principles.

In conclusion, the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies all contribute to an assessment that is incomplete and unreliable. Such deficiencies hinder any meaningful evaluation of the impacts on marine life and fisheries, leaving communities at risk.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal involves significant onshore infrastructure works, including cabling across protected moorland, the construction of a substation near Stornoway, and access infrastructure through sensitive landscapes. These elements are assessed separately from the offshore turbines, which leads to a fragmented evaluation and obscures the true scale of the project's environmental and socio-economic impacts. The excavation

across deep peat areas, particularly within Barvas Moor, threatens a critical carbon store and ecologically sensitive habitat. The application fails to provide a comprehensive assessment of these impacts, which inhibits a complete understanding of the project's overall environmental footprint.

By neglecting to adequately assess the onshore impacts, the application does not allow for a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered together. However, the separation of onshore and offshore elements leaves the combined impacts on peatlands, habitats, and local communities inadequately understood.

Moreover, there are considerable risks to sensitive habitats such as machair systems and peatland environments, which enjoy policy protection. The application does not demonstrate that the impacts on these habitats have been thoroughly assessed or that effective avoidance measures have been taken. This results in a clear evidential gap regarding biodiversity protection.

The proposal raises critical concerns about carbon balance. Disturbing peatland can release stored carbon, potentially generating a carbon debt that undermines the goals of renewable energy development. The application does not sufficiently address this matter or show that the overall carbon balance remains beneficial.

Additionally, routing infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. There is a lack of evidence that necessary consents or processes have been initiated, which raises serious questions about the deliverability and lawful implementation of the project.

From a policy standpoint, the failure to assess the project comprehensively and to demonstrate the protection of peatlands, habitats, and land use interests is in conflict with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further weakens the application.

In summary, the separation of project components, the absence of a thorough assessment, and the lack of evidence regarding environmental and land use impacts render this application incomplete and unreliable, ultimately obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment does not include an evaluation of dark skies and nocturnal wildlife, representing a significant oversight. The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental

quality, cultural identity, and tourism potential. The proposed development would introduce permanent red aviation lighting that is visible over long distances, resulting in a continuous and intrusive "wall of light" across the western horizon. This change would fundamentally alter the night-time environment.

Furthermore, the application fails to consider how this lighting would affect visual amenity, landscape character, and the experiences of residents and visitors. The significance of dark skies to the area's identity and the growth of tourism sectors like astro-tourism underscores the importance of addressing this issue. The absence of an assessment on these impacts leads to a notable deficiency in the overall landscape and environmental evaluation.

More critically, there is no analysis of the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly sensitive to artificial lighting, which can cause disorientation and increase the risk of collisions. The application lacks any assessment of lighting impacts or a phototaxis study, thereby failing to evaluate how aviation lighting might affect these species or heighten mortality rates.

The reliance on daytime survey data in the ornithological assessment further exacerbates this oversight, as it does not account for nocturnal activity or associated risks. Additionally, Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation caused by artificial lighting, yet this risk has not been examined. The lack of site-specific night-time data creates a critical gap in understanding the ecological impacts.

Without a proper assessment of nocturnal effects, it is impossible to ascertain whether protected species or designated sites could be adversely impacted. The necessary evidential standard to exclude adverse effects beyond reasonable scientific doubt cannot be achieved, thus invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission contradicts the National Planning Framework 4 regarding the protection of natural places and environmental quality. It also weakens the overall analysis of landscape and seascape impacts, as the night-time character is an essential component of the environment.

In summary, the lack of assessment of dark skies and nocturnal wildlife represents a significant evidential gap. The absence of baseline data, impact modelling, and species-specific analysis results in an incomplete application that cannot support a lawful determination.

TOURISM

The assessment of tourism impacts associated with the proposed development is severely inadequate and neglects to consider the economic and social ramifications for a vital sector of the Isle of Lewis economy. Tourism is intrinsically linked to the area's wild coastline, near-pristine landscape, dark skies, and its sense of remoteness. Although the application recognises that 86% of visitors are attracted by the scenery, it fails to provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contributions of this sector.

Since 2017, tourism on the Isle of Lewis has experienced substantial growth, rising from £65 million to over £81.5 million, supporting more than 1,000 jobs and accounting for as much as 16% of the island's economy. Despite this significant increase, the application does not model the potential impacts of seascape industrialisation and the loss of environmental quality on Tourism Gross Value Added or the broader economic resilience of the area. Without this analysis, it remains impossible to ascertain whether the proposed development would yield a net economic benefit or jeopardise an established and flourishing sector.

Moreover, the evaluation neglects to take into account the essential role of environmental quality in sustaining tourism, including the critical importance of unspoiled landscapes and dark skies to enhance visitor experiences and emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this deficiency, creating a notable gap in understanding the impacts on a recognised and expanding part of the local economy.

In an island community with limited economic diversification, the neglect to assess tourism impacts carries broader implications for employment, local businesses, and the sustainability of the community. The absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been adequately evaluated, as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not illustrate compliance with the National Planning Framework 4, particularly concerning economic impact and the necessity to demonstrate net benefit. It also contradicts strategic objectives that designate tourism as a key growth sector and fails to provide sufficient evidence for the competent authority to evaluate the economic consequences of the proposal.

In summary, the inability to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and recognise the island's economic dependencies results in a

considerable evidential void. This deficiency hampers a comprehensive evaluation of economic effects and contributes to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development when evaluated against statutory responsibilities, national policy, and evidential standards. The application mirrors the core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. This new application, however, is being assessed within a more robust policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

Critical gaps exist in the evidential basis provided for determination. There are notable deficiencies in baseline data, an ambiguous design envelope, and reliance on unspecified mitigation measures. Moreover, it overlooks significant impact pathways, including nocturnal wildlife, the full extent of onshore infrastructure, and potential tourism effects. Consequently, the Environmental Impact Assessment is incomplete, failing to offer a comprehensive understanding of likely significant effects or residual impacts.

There are pronounced procedural deficiencies as well. The lack of a compliant Island Communities Impact Assessment constitutes a violation of statutory duties under the Islands (Scotland) Act 2018, while the failure to present a full Social Impact Assessment represents a material omission. These shortcomings inhibit the competent authority from evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal stands in direct opposition to the National Planning Framework 4. It does not sufficiently demonstrate the protection of biodiversity, natural landscapes, and cultural heritage. Furthermore, it fails to show that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, as tourism impact modelling is absent. The cumulative impacts of both offshore and onshore components have not been adequately assessed, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainty surrounds the environmental risks, which may be significant. Assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and contain inconsistencies. The evidential threshold required to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and barring a lawful conclusion that impacts are acceptable.

Additionally, the proposal would lead to considerable and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, loss of dark skies, disruption of cultural and visual relationships, and negative impacts on tourism represent permanent consequences that cannot be adequately mitigated.

Overall, the application is both procedurally and substantively unfit for determination. The combination of information deficiencies, policy conflicts, and unresolved environmental risks precludes a lawful and evidence-based decision. The competent authority must refuse consent on these grounds or utilise the appropriate regulatory provisions to demand the submission of the missing information.

In light of the aforementioned issues, a formal request is made for the complete refusal of the application for the Spiorad na Mara Offshore Wind Farm.

Additional Comments

I hate wind farms

Member of Public 204

Objection To Spiorad na Mara Offshore Wind Farm
References: MD-00011742 & MD-00011743

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the marine licensing and Environmental Impact Assessment regimes. A review of the Environmental Impact Assessment Report and its supporting documentation has revealed significant planning, environmental, cultural, and procedural deficiencies. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, a near-pristine environment, and a strong cultural identity. The scale, proximity, and design of the wind farm raise serious concerns regarding its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis necessary for a lawful determination. There is a notable absence of critical environmental data, while the baseline information provided is both limited and inconsistent. Furthermore, key aspects of the proposal remain undefined. The flexible design framework inhibits a clear understanding of the likely significant effects, and the reliance on unspecified mitigation measures means their effectiveness cannot be evaluated. Consequently, the documentation fails to furnish a complete or informed understanding of the environmental, cultural, or community impacts, and claims regarding negligible or non-significant effects lack robust supporting evidence.

There are evident and substantial conflicts with policy. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These policy conflicts directly challenge the statutory tests needed for consent and hinder the competent authority's ability to determine the acceptability of the development from a policy perspective.

The unprecedented scale of the proposal, with large turbines located in close proximity to the shoreline, raises significant concerns about landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance illustrates that the application is incomplete and cannot support a

lawful determination. In light of these issues, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally inadequate and fails to deliver a comprehensive, transparent, or trustworthy evaluation of the probable environmental repercussions of the proposal. By employing a flexible Project Design Envelope without any firm commitment to particular turbine dimensions, layouts, or configurations, significant uncertainty is introduced. This ambiguity undermines the integrity of the assessment and means that the impacts outlined may not accurately represent the development that is ultimately constructed. Consequently, both the public and the competent authority are deprived of a clear understanding of the true extent of environmental effects.

The application places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. As a result, consent is being sought on the premise that environmental harm will be addressed after approval, which obstructs any meaningful evaluation of effectiveness or assessment of residual impacts. This postponement of crucial information to post-consent phases is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be thoroughly established before determination.

Moreover, there exist significant evidential deficiencies, such as gaps in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the magnitude and significance of impacts, especially when conclusions of negligible or non-significant effects are made without robust supporting data. The lack of sufficient information hampers a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory requirements.

As a result, the application does not satisfy the evidential threshold necessary under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate adherence to National Planning Framework 4, including stipulations concerning biodiversity protection and environmental integrity, as it cannot be demonstrated that impacts have been fully assessed or that appropriate safeguards are in place.

In conclusion, the reliance on an undefined design envelope, the absence of specified

mitigation, and the gaps in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings obstruct a lawful and thorough assessment of environmental effects and mean that the competent authority lacks the necessary information to make a determination regarding the application.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species in the application is significantly flawed and does not provide a comprehensive understanding of the ecological receptors in the West Lewis coastal environment. This area is known for its biological sensitivity and activity, yet the baseline data available is insufficient, and the methodologies employed fail to accurately capture essential details regarding species presence, behaviour, and habitat usage. Consequently, the assessment lacks a reliable evidential foundation for evaluating potential impacts.

A notable shortcoming is the inadequate recognition of otters, classified as a European Protected Species. The application does not effectively assess their active utilisation of coastal regions for foraging and movement. This oversight in considering their core foraging range and behavioural tendencies means that potential impacts from construction disturbances, noise, and increased human activity have not been properly evaluated, undermining claims regarding the lack of significant effects on this species.

Additionally, there are shortcomings in the evaluation of basking sharks, primarily due to reliance on aerial surveys, which are prone to significant detection bias under Atlantic conditions. This approach is likely to result in an underestimation of their presence, especially when compared to established land-based observations that indicate these waters are frequently used by the species. The failure to incorporate relevant data further contributes to an incomplete baseline and diminishes the credibility of the conclusions drawn.

These methodological deficiencies imply that assertions of negligible or non-significant effects are based on assumptions rather than substantiated evidence. The absence of adequate baseline data also hinders the ability to conduct meaningful assessments of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. This situation generates uncertainty regarding the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the criteria set forth by the Environmental Impact Assessment framework and the National Planning Framework 4, as it fails to properly identify and assess protected species. The uncertainty introduced by these deficiencies prevents the dismissal of potential

adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these conditions, granting consent would not be lawful.

In summary, the combination of incomplete baseline data, inadequate methodologies, and unsubstantiated conclusions renders the assessment untrustworthy. These shortcomings hinder a thorough evaluation of the impacts on marine ecology and protected species, reinforcing the overall conclusion that the application does not possess a solid evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, containing significant gaps in evidence and inconsistencies that undermine its conclusions. This raises serious concerns, particularly given that the west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. The application fails to meet the necessary evidential standard to demonstrate that these species will not be adversely affected. It is located within key foraging areas and migratory pathways, yet the assessment does not adequately evaluate the risks associated with displacement, collision, or habitat loss.

Moreover, a critical contradiction is present within the application itself. The developer asserts that there will be no significant adverse effects, while also pursuing a Habitats Regulations derogation case, which is only applicable when significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment and highlights that the conclusions drawn are not substantiated by the evidence provided. Insufficient evidence is presented regarding the impact on seabirds associated with protected sites such as the Lewis Peatlands and St Kilda. The importance of these feeding grounds is not fully recognised, and the reliance on modelling approaches injects uncertainty, particularly for species like Kittiwakes and Fulmars that are in severe decline. There is a strong likelihood that the methodologies employed underestimate mortality, especially given that baseline data is lacking and behavioural responses remain poorly understood.

The proposed siting of turbines within a known migratory corridor introduces an additional risk, creating a barrier in a primary flight path used by birds migrating between the United Kingdom and Iceland. The long-term consequences of sustained mortality in this corridor, as well as the potential effects on species with small global populations, are not adequately assessed in the application.

From a regulatory standpoint, the application does not satisfy the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The combination of contradictory conclusions, data deficiencies, and limitations

in the modelling means that the standard of beyond reasonable scientific doubt has not been met. This situation engages the precautionary principle and precludes a lawful conclusion in support of consent. The deficiencies identified also represent a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to show that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

In summary, the assessment is unreliable due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. These shortcomings hinder a thorough evaluation of impacts and contribute to the overall conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment regarding cultural heritage and community identity is fundamentally flawed, failing to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. The application adopts a narrow view, treating heritage as separate, static entities, rather than acknowledging their ongoing social, cultural, and spiritual significance within the community.

A major shortcoming is evident in the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for burial and spiritual practices, yet are classified merely as static features in the assessment. This classification neglects their current use, meaning, and the implications of development on their surroundings. Such a mischaracterisation leads to an incomplete evaluation of cultural effects and overlooks their vital role in community life.

Additionally, the assessment does not adequately address intangible cultural heritage, including the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These factors are crucial to the area's identity but have been entirely disregarded, resulting in a significant oversight. Without considering these elements, the cultural ramifications of the proposed development cannot be comprehensively understood.

Concerns also arise surrounding community rights and engagement. The Gaelic-speaking population is recognised as possessing a distinct cultural identity, akin to that of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent undertaken. This lack of meaningful engagement compromises the legitimacy of the assessment and fails to adhere to established principles regarding participation

in decisions that influence cultural and environmental interests.

A serious procedural lapse is the failure to conduct a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The absence of this assessment means that the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders a lawful determination impossible.

From a policy standpoint, these inadequacies place the proposal in direct conflict with National Planning Framework 4, particularly concerning the safeguarding of historic assets and places. The neglect to consider both tangible and intangible heritage, as well as to acknowledge living cultural practices, signifies a clear deviation from policy requirements.

Overall, the failure to adequately assess living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been thoroughly examined, and the application does not provide a solid foundation for evaluating the genuine cultural cost associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development raises significant concerns regarding social impacts, health, and wellbeing, as the assessment currently lacks the necessary transparency for a lawful evaluation. Although a Social Impact Assessment was commissioned by the developer, which included focus groups with local residents, the full report remains unpublished. This lack of access creates an important evidential gap, inhibiting both public understanding and the competent authority's ability to assess the identified social risks based on the developer's own research.

Local residents have reported measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement and are therefore concrete rather than speculative. However, the omission of the full assessment hampers proper scrutiny of the findings and limits the determination of their significance in the decision-making process.

Moreover, the proposal is viewed as a potential threat to community identity and cohesion, with the concept of “cultural loss” highlighted in the developer's findings. Despite this acknowledgment, the impacts related to community cohesion have not been adequately incorporated into the main application or given the appropriate consideration. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when they may affect community character and functioning. By failing to provide the complete dataset, the application does not offer a solid evidential foundation for weighing benefits against harms.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 regarding health and wellbeing. It is essential for developments to promote positive health outcomes and mitigate harm, yet the available evidence reveals existing adverse effects that have not been fully addressed. Without the complete assessment, it is impossible to prove compliance with this policy.

The procedural implications of this situation are considerable. The competent authority cannot perform a thorough socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This omission constitutes a significant gap in the application and does not meet the evidential requirements established by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, coupled with evidence of ongoing adverse impacts, results in an incomplete and unreliable assessment. This scenario impedes a lawful determination and highlights the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by an open Atlantic horizon, an undeveloped nature, and a strong sense of remoteness. The introduction of large-scale turbines near the shoreline would create a continuous industrial presence, fundamentally altering this character and leading to a permanent and irreversible transformation of the landscape. The assessment of seascape, landscape, and visual impacts fails to adequately reflect the scale of this change or the sensitivity of the surrounding environment.

The magnitude of the visual change has not been properly represented within the application. Given the scale and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and diminishing the defining qualities of naturalness and remoteness. This assessment does not convey the true level of impact or its significance in the context of such a sensitive landscape.

Concerns arise regarding the selection and presentation of visual viewpoints. Evidence

indicates that these viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, especially in relation to key cultural heritage sites and valuable landscapes. This raises the risk that the magnitude of visual impact has been understated, thereby undermining the assessment's reliability.

A significant omission is the failure to assess the interconnected relationship between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments exist within a wider landscape setting that is visually and spatially linked to the Atlantic horizon. The assessment treats these assets in isolation, neglecting their interdependence, which leads to an incomplete evaluation of the impacts on their settings and cultural significance.

The industrialisation of the seascape would sever these relationships, changing the context in which heritage assets are experienced and disrupting their connection to the natural horizon. This presents not only a visual impact but also a broader cultural and spatial harm that the application has not adequately considered.

From a policy standpoint, the proposal conflicts with National Planning Framework 4 regarding the protection of natural places and historic assets. The proposed scale of change is incompatible with safeguarding landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case assessment further undermines any assertion of policy compliance.

Moreover, it is evident that the identified impacts cannot be effectively mitigated. Due to the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. The resulting change is thus fundamental and permanent, rather than something that could be mitigated to an acceptable level.

Overall, the assessment fails to accurately depict the scale of impact, the environment's sensitivity, and the interconnectedness of landscape and heritage. These shortcomings impede a reliable evaluation and strengthen the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks lacks completeness and fails to provide the necessary detail to evaluate potential environmental effects. The proposal entails significant seabed preparation and installation activities within a high-energy Atlantic environment, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application relies on mitigation and contingency measures to be formulated after consent, which obstructs any meaningful evaluation of their adequacy or effectiveness.

This dependence on undefined future measures raises significant concerns due to the sensitivity of the surrounding environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are susceptible to sediment disruption and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it lacks adequate detail on prevention, control, or monitoring strategies.

Additionally, there is uncertainty concerning the scale and behaviour of sediment plumes resulting from seabed disturbances and cable installation. Without comprehensive modelling and clearly articulated management strategies, it is impossible to ascertain the extent, duration, or ecological repercussions of these impacts. This uncertainty also relates to potential effects on sensitive marine species and habitats identified in the broader assessment.

Moreover, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application hinders the evaluation of whether appropriate safeguards are in place to address pollution incidents. This introduces procedural risks and diminishes the capability of the competent authority to assess environmental protection measures during the determination process.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. It is necessary to assess likely significant effects and mitigation measures before consent; without this information, a lawful determination cannot be achieved. Furthermore, the application fails to demonstrate compliance with policy requirements related to environmental protection and water quality.

In summary, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts all contribute to a materially deficient assessment. These deficiencies obstruct a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application remains incomplete.

FISHERIES AND MARINE LIFE

The proposal presents significant shortcomings in its assessment of fisheries and marine life, which is critical given the rich marine ecosystem and vibrant fishing industry off the West Lewis coast. It fails to adequately protect or maintain these vital habitats while raising concerns about socio-economic impacts. A fundamental flaw lies in the assumption that fishing activities can be easily displaced. The application lacks

evidence to show that alternative fishing grounds are both available and capable of accommodating the additional pressure, which poses a risk of overfishing elsewhere and could have detrimental effects on local livelihoods.

Moreover, the proposal introduces serious risks to marine species, particularly due to the underwater noise generated from construction activities. The anticipated long-duration hammer piling is expected to disturb marine life over large distances, notably impacting the local bottlenose dolphin population. The application seems to minimise the importance of these disturbances, offering insufficient evidence to support its claims.

In a troubling contradiction, the application acknowledges the necessity for licences to allow for potential harm to European Protected Species while simultaneously describing the anticipated impacts as negligible. This inconsistency casts doubt on the assessment's credibility and raises alarms regarding compliance with the Habitats Regulations, especially where anticipated harm may necessitate legal authorisation.

Additionally, the assessment does not account for the cumulative impacts from various pressures such as habitat disturbance, noise, and the displacement of fishing activity. Without a thorough evaluation of these combined factors, it is impossible to ascertain the overall impact on marine ecosystems and the socio-economic conditions tied to them.

From a policy standpoint, the proposal does not align with the National Planning Framework 4 or the National Marine Plan. It fails to demonstrate that the development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity. This lack of clarity prevents any determination that the project constitutes sustainable development.

In summary, the deficiencies in the assessment regarding fishing displacement, underappreciation of acoustic impacts, and internal contradictions render the evaluation incomplete and unreliable, hindering a thorough understanding of the potential repercussions on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal presents significant deficiencies in the assessment of onshore infrastructure, which is essential to understanding the entire project's impacts. The offshore turbines and onshore works are interconnected; however, they are evaluated in isolation. This fragmented assessment obscures the complete picture of both environmental and socio-economic effects.

Onshore activities include installing cabling across protected moorland and constructing a substation near Stornoway. These developments require access infrastructure through sensitive landscapes and involve excavation in areas of deep peat, especially within Barvas Moor, a crucial carbon store and ecologically delicate habitat. The lack of a thorough assessment regarding these impacts limits the understanding of the project's overall environmental footprint.

By deferring the evaluation of onshore impacts, the application hinders a proper assessment of cumulative effects. The Environmental Impact Assessment process mandates that all project components must be considered collectively. The division between offshore and onshore aspects prevents a complete understanding of the combined effects on peatlands, habitats, and local communities.

There are notable risks to sensitive habitats, such as machair systems and peatland areas, which are protected by policy. The proposal fails to show that these habitats have been fully assessed, or that suitable avoidance measures have been implemented, resulting in a significant evidential gap concerning biodiversity protection.

Moreover, the project raises issues related to carbon balance. Disturbing peatland can release stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy initiatives. The proposal does not satisfactorily address this concern or prove that the overall carbon balance is advantageous.

Routing infrastructure through active croft land may also conflict with established land use and legal rights. The application lacks evidence that necessary consents have been obtained or that proper processes are underway, thus calling into question the feasibility and legality of the implementation.

From a policy standpoint, the inadequate assessment of the project as a whole, along with the failure to demonstrate protection for peatlands, habitats, and land use interests, conflicts with the National Marine Plan and the National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further weakens the application.

In summary, the separation of project components, the absence of comprehensive assessments, and the lack of evidence regarding environmental and land use impacts render this section of the application incomplete and unreliable, preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of evaluation regarding nocturnal wildlife represents a significant gap in the Environmental Impact Assessment. No assessment has been made concerning the impacts of artificial lighting on species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, all of which are highly sensitive to light. These species can experience disorientation due to phototaxis, leading to an increased risk of collision. The application does not provide a lighting impact assessment or a phototaxis study, which means it fails to consider how the proposed aviation lighting could affect these species or potentially increase mortality rates.

Moreover, the assessment relies on daytime survey data, neglecting nocturnal activity and the associated risks. Species like Kittiwakes, which may forage or migrate at night, are similarly vulnerable to the effects of artificial lighting. This oversight creates a critical gap in understanding the ecological impacts that the proposal may have on local wildlife.

The introduction of permanent red aviation lighting is another significant concern. This lighting would be visible over long distances, creating an intrusive "wall of light" across the western horizon, which would fundamentally alter the night-time environment. The assessment does not address how this would impact visual amenity, landscape character, or the experience of residents and visitors, despite the importance of dark skies to the area's identity and its emerging tourism sectors, such as astro-tourism.

From a policy standpoint, these omissions conflict with National Planning Framework 4, which relates to the protection of natural places and environmental quality. The absence of an assessment of dark skies undermines the broader evaluation of landscape and seascape impacts, as the night-time character is an integral part of the environment.

Overall, the failure to assess the impacts on dark skies and nocturnal wildlife constitutes a significant evidential gap. The lack of baseline data, impact modelling, and species-specific analysis leaves the application incomplete and unable to support a lawful determination. Without a thorough assessment, it is impossible to ascertain whether protected species or designated sites would be adversely affected, which engages the precautionary principle and necessitates a more cautious approach.

TOURISM

The tourism sector on the Isle of Lewis has seen substantial growth, rising from £65 million in 2017 to over £81.5 million, which now supports more than 1,000 jobs and accounts for up to 16% of the island's economy. However, the assessment of the application inadequately addresses the potential economic and social impacts on this critical sector. Tourism relies heavily on the area's wild coastline, near-pristine

landscapes, dark skies, and a sense of remoteness. While the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution of tourism.

Moreover, the assessment neglects to evaluate how the industrialisation of the seascape and a loss of environmental quality could affect the Tourism Gross Value Added and broader economic resilience. Without this analysis, it is impossible to ascertain whether the proposed development would generate a net economic benefit or hinder a sector that is already established and growing.

The role of environmental quality in supporting tourism is also overlooked, particularly concerning the significance of unspoiled landscapes and dark skies for visitor experiences, which are crucial for emerging markets like nature-based tourism and astro-tourism. The omission of a Dark Skies Assessment further highlights this deficiency, creating a major gap in understanding the impacts on an increasingly recognised aspect of the local economy.

In an island community with limited economic diversification, the failure to assess tourism impacts carries broader ramifications for employment, local businesses, and community sustainability. The lack of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been properly evaluated, as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, especially regarding economic impact and the need to show a net benefit. It conflicts with strategic objectives that identify tourism as a priority growth sector and fails to provide adequate evidence for the competent authority to assess the economic consequences of the proposal.

Taken collectively, the absence of a detailed quantification of tourism impacts, the lack of consideration for environmental factors influencing visitor behaviour, and the oversight of the island's economic dependency lead to a significant evidential gap. This gap inhibits a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the standards of sustainable development as required by statutory duties, national policy, and evidential standards. It echoes the critical concerns that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed

unacceptable. This new application, despite being presented under a more stringent policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, does not adequately address these issues.

There are significant deficiencies in the evidential basis required for determination. The application lacks comprehensive baseline data, relies on an undefined design envelope, and depends on unspecified mitigation measures. Additionally, it omits essential impact pathways such as those affecting nocturnal wildlife, full onshore infrastructure, and the potential tourism effects. As a result, the Environmental Impact Assessment is incomplete, preventing a thorough understanding of significant effects and residual impacts.

Procedural shortcomings are also evident. The failure to produce a compliant Island Communities Impact Assessment is a breach of statutory duty under the Islands (Scotland) Act 2018. Moreover, the incomplete disclosure of the Social Impact Assessment represents a material omission, hindering the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These failures render the application unsuitable for determination.

The proposal conflicts directly with the National Planning Framework 4. It does not demonstrate adequate protection of biodiversity, natural habitats, or cultural heritage. Additionally, it fails to provide evidence of acceptable health and wellbeing impacts and lacks tourism impact modelling necessary to substantiate any net economic benefit. The assessment of cumulative impacts, both offshore and onshore, has not been adequately conducted, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks posed by the proposal are uncertain and could be significant. Evaluations related to marine ecology, seabirds, protected species, and marine mammals are incomplete and often inconsistent. The necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

Furthermore, the proposal would lead to substantial and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual connections, and the adverse effects on tourism represent lasting impacts that cannot be adequately mitigated.

In summary, the application is procedurally and substantively unfit for determination. The considerable information gaps, alongside policy inconsistencies and unresolved

environmental risks, hinder the ability to reach a lawful and evidence-based decision. It is imperative that the competent authority refuse consent on these grounds or require the submission of the missing information.

Thus, I formally request that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Additional Comments

This development will have a huge, detrimental & irreversible effect on the islands which are our home. All without any real consultation with island residents, all of whom will be affected, no matter which part of the Western Isles they reside.
Already we see the landscape around us being changed, even before planning consent granted.
In the immediate term, our already stretched services, be it Local Authority, NHS, Police, or transport, will struggle, even more than now, to cope with the huge influx of workers. If any contingency plans have been made, they certainly haven't been shared with island residents. Therefore, we can only assume there are no such plans, which leads us to believe we and our opinions are regarded as irrelevant to this discussion.
Our travel options are already limited when visitor numbers increase through tourism, but that at least is generally for a limited period. It'll be a year-round problem from the start of work related to this development.
Will our hospital staffing and bed availability be increased?
Will ambulance service be increased?
Will the local police force and fire services be increased?
Will road maintenance be increased?
The list goes on…
The environmental damage caused by this will be immense. Marine life and seabirds will inevitably suffer.
The visual impact alone should be enough to turn down this application. Hideous! How quickly the same officials who use the unique, largely unspoilt, beauty of these islands to attract visitors, can now just dismiss that and agree to destroy it, for the benefit of…… ???Certainly not the islanders!
It saddens me to think that our unique island heritage, culture and landscape is being sold off, with no care for those of us who live here and are proud to call it home.

Member of Public 205

Objection To Spiorad na Mara Offshore Wind Farm
References: MD-00011742 & MD-00011743

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. A thorough review of the Environmental Impact Assessment Report and related documents has revealed significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The project is proposed off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, nearly untouched environment, and strong cultural heritage. Concerns arise from the scale, design, and proximity of the proposal, questioning its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis necessary for a lawful assessment. There is a notable absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Additionally, many key elements of the proposal remain undefined. This flexible design framework hinders a clear understanding of the likely significant effects, while the reliance on unspecified mitigation measures prevents an assessment of their potential effectiveness. Consequently, the documentation fails to facilitate a complete understanding of the environmental, cultural, or community impacts, and claims of negligible effects lack robust evidence.

There are evident and serious policy conflicts inherent in this proposal. It appears to be at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural habitats, cultural heritage, and the well-being of communities. The application does not adequately demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts are critical to the statutory tests needed for consent and undermine the competent authority's capacity to conclude that the development meets policy standards.

Moreover, the unprecedented scale of the proposal, with large turbines situated close to the shoreline, raises significant issues regarding landscape capacity, visual dominance, and environmental repercussions. Collectively, the lack of sufficient information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance illustrate that the application is incomplete and

cannot support a lawful determination. Under these circumstances, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks comprehensiveness and fails to deliver a transparent and reliable account of the potential environmental impacts associated with the proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty. This uncertainty hampers the application of a worst-case scenario assessment and undermines the integrity of the evaluation, obscuring the actual environmental effects that may arise from the proposed development. Consequently, both the public and the competent authority are left without a clear understanding of the true extent of these effects.

Additionally, the application leans heavily on unestablished mitigation measures, monitoring strategies, and management plans. Seeking consent based on the premise that environmental harm will be mitigated in the future hinders any meaningful evaluation of the effectiveness of these measures or an assessment of residual impacts. This postponement of crucial information to post-consent stages is procedurally unacceptable and contradicts the intention of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation be clearly established before any determination.

Furthermore, there are notable evidential shortcomings, including insufficient baseline data, methodological limitations, and a reliance on assumptions instead of site-specific evidence. Such deficiencies lead to uncertainty regarding the scale and significance of impacts, particularly when negligible or non-significant effects are concluded without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, contributing to scientific uncertainties that cannot align with statutory requirements.

As a result, the application does not satisfy the evidential threshold established by the Habitats Regulations, which demands the exclusion of adverse effects beyond reasonable scientific doubt. This situation activates the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not align with the National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it fails to demonstrate that impacts have been thoroughly assessed or that appropriate safeguards are in place.

Collectively, the reliance on an ambiguous design envelope, the lack of specified mitigation strategies, and the gaps in baseline data render the Environmental Impact

Assessment Report both unreliable and incomplete. These shortcomings prevent a lawful and rigorous assessment of environmental effects and leave the competent authority without the necessary information to make an informed determination regarding the application.

ASSESSMENT OF ALTERNATIVES

The evaluation of alternatives within the application is significantly deficient and does not satisfy the legal obligations of the Environmental Impact Assessment framework. Instead of offering a thorough and reasoned analysis of feasible alternatives based on their environmental ramifications, the application provides a narrative detailing the project's evolution. This method fails to prove that less damaging options have been adequately identified, assessed, and chosen over more harmful solutions.

Moreover, the application lacks a transparent or evidence-driven comparison of alternative offshore locations, development scales, or design configurations. Notably, it does not show that the developer has genuinely considered placing turbines further offshore, which would likely lessen visual, ecological, and coastal impacts. Considering the sensitivity of the West Lewis coastline and the crucial role of proximity to the shore in assessing impact, the absence of such an analysis makes it impossible to determine whether the proposed siting is indeed the least damaging option.

These shortcomings are also evident in the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly explored to mitigate impacts on sensitive receptors. This includes areas of cultural and spiritual significance, such as Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis suggest that mitigation through design has not been utilised, with an over-reliance on measures intended for post-design mitigation.

Consequently, the application does not demonstrate that environmental harm has been minimised through thoughtful site selection, layout, and infrastructure routing. This oversight constitutes a failure to adhere to the established mitigation hierarchy and hampers the competent authority's ability to ascertain whether more suitable and less harmful alternatives are available. Without a comprehensive assessment of alternatives, it cannot be concluded that the proposal offers a sustainable or policy-compliant solution.

From a policy standpoint, this inadequacy undermines adherence to National Planning Framework 4, particularly regarding the preservation of natural environments, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment represents a significant shortcoming that leads to the conclusion that the

application has not undergone sufficient scrutiny and cannot facilitate a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The application presents an assessment of marine ecology and protected species that is materially deficient, failing to deliver a complete and reliable understanding of ecological receptors within the West Lewis coastal environment. This area is a highly sensitive and biologically active marine system; however, the baseline data is incomplete, and the methodologies employed do not adequately capture species presence, behaviour, and habitat use. Consequently, there is no sound evidential basis for evaluating potential impacts.

One significant oversight involves otters, which are a European Protected Species. The application does not adequately recognise or assess their active use of coastal areas for foraging and movement. The core foraging range and behavioural patterns of otters have not been properly considered, meaning that the potential impacts of construction disturbance, noise, and increased activity remain inadequately assessed. This lack of consideration undermines the conclusions drawn regarding the absence of significant effects on this species.

In addition, the assessment of basking sharks suffers from further deficiencies. The reliance on aerial surveys introduces substantial detection bias, particularly in Atlantic conditions, likely leading to an underestimation of their presence. This is particularly evident when compared to established land-based observations which indicate frequent use of these waters. The failure to incorporate or adequately consider such data results in an incomplete baseline and diminishes the reliability of the conclusions provided.

Due to these methodological limitations, the conclusions of negligible or non-significant effects rest on assumptions rather than robust evidence. Moreover, the lack of sufficient baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variation and broader ecosystem interactions. This uncertainty clouds the true scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not meet the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been properly identified or assessed. The level of uncertainty introduced precludes the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these circumstances, consent cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions render the assessment unreliable. These shortcomings prevent a rigorous evaluation of impacts on marine ecology and protected species, leading to the overarching conclusion that the application does not possess a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposal is fundamentally flawed, exhibiting substantial gaps in evidence and inconsistencies that undermine its conclusions. Key foraging areas and migratory pathways, particularly along the west coast of the Isle of Lewis, support internationally important seabird populations, many of which are already experiencing declines. However, the application fails to demonstrate, to the necessary evidential standard, that these species will not be adversely affected by the development. The implications of displacement, collision risk, and habitat loss have not been robustly evaluated.

There exists a significant contradiction within the application. The developer concludes that there are no significant adverse effects while simultaneously presenting a Habitats Regulations derogation case, which is only warranted when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the evidence presented.

Moreover, the assessment does not sufficiently demonstrate that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is inadequately considered, and reliance on modelling approaches introduces uncertainty, especially for species in severe decline like Kittiwakes and Fulmars. The methodologies utilised are likely to underestimate mortality rates, particularly given the incomplete baseline data and a lack of comprehensive understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor presents additional significant risks, effectively creating a barrier along a primary flight path for species migrating between the United Kingdom and Iceland. The application does not thoroughly assess the long-term implications of sustained mortality in this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application fails to meet the evidential threshold necessary to assert no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, alongside gaps in data and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This

invokes the precautionary principle, which precludes a lawful conclusion that would support consent.

Additionally, these deficiencies represent a failure to comply with National Planning Framework 4 concerning biodiversity protection and the preservation of natural assets. The inability to convincingly demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

In summary, the assessment is unreliable due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. These shortcomings hinder a thorough evaluation of impacts and lead to the overall conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity associated with the proposed development is significantly deficient and overlooks the West Lewis coastline's status as a dynamic cultural landscape, where the environment, language, tradition, and community are interconnected. The application employs a simplistic approach that treats heritage as discrete, unchanging assets, neglecting their ongoing social, cultural, and spiritual relevance within the community.

A major shortcoming is evident in the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active places for burial and spiritual practice; however, the assessment categorises them merely as static elements, failing to acknowledge their continued use and significance, as well as the potential impact of development on their surroundings. This mischaracterisation leads to an inadequate evaluation of cultural effects and ignores their vital role in community life.

Moreover, the application does not account for intangible cultural heritage aspects, including the Gaelic language and local traditions, as well as the enduring relationship between the community and its coastal environment. These components are essential to the region's identity yet are conspicuously absent from the assessment, representing a critical oversight. Without addressing these elements, the true cultural impact of the development remains poorly understood.

There are also significant concerns regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity that is recognised as characteristic of Indigenous Peoples, yet the process of Free, Prior and Informed Consent has not been implemented. The lack of meaningful engagement undermines

the validity of the assessment and fails to adhere to established principles concerning participation in decisions that affect cultural and environmental interests.

Additionally, a significant procedural error is the omission of a compliant Island Communities Impact Assessment, which is a statutory obligation under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to fulfil its legal responsibilities to evaluate the social, cultural, and economic impacts on the island community. This gap alone renders the determination of the application unlawful.

From a policy standpoint, these shortcomings place the proposal in direct violation of National Planning Framework 4, particularly regarding the protection of historic assets and sites. The failure to take into account both tangible and intangible heritage and to acknowledge living cultural practices signifies a clear deviation from policy mandates.

In summary, the lack of assessment concerning living heritage, intangible cultural values, community rights, and statutory requirements results in a substantial evidential gap. The cultural ramifications of the development have not been adequately appraised, and the application fails to present a sufficient basis for assessing the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the Social Impact Assessment is deeply concerning and significantly undermines the evaluation of social impacts, health, and wellbeing associated with this development. Although the developer conducted focus groups with local residents, the full report has not been made available. This gap in evidence hinders both public understanding and the competent authority's ability to grasp the full extent of social risks identified through the developer's own work.

Residents are already reporting measurable stress, anxiety, and concern related to the scale and proximity of the proposal, and these impacts arise from direct engagement rather than speculation. However, without access to the complete assessment, it is impossible to scrutinise the findings thoroughly or to appreciate their significance in the decision-making process.

Moreover, there is an evident perception that the proposal threatens community identity and cohesion, with the developer's own findings noting a risk of "cultural loss." Despite this, these critical impacts have not been adequately integrated into the main application or given the necessary consideration. The withholding of the full Social Impact Assessment obscures the genuine human and social costs associated with the proposed development.

This situation adversely affects the Environmental Impact Assessment process, as a comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly in terms of their effects on community character and functioning. The lack of the complete dataset undermines the application, preventing a thorough assessment of the balance between potential benefits and harms.

From a policy standpoint, the application fails to align with National Planning Framework 4 regarding health and wellbeing, which stipulates that developments should promote positive health outcomes while avoiding harm. The available evidence suggests existing adverse effects that have not been fully disclosed, making it impossible to demonstrate compliance with this policy without the complete assessment.

Procedurally, the implications are significant. The competent authority cannot conduct a thorough socio-economic and health evaluation in the absence of the full Social Impact Assessment. This omission represents a serious flaw within the application and indicates a failure to meet the evidential requirements mandated by the Environmental Impact Assessment framework.

Collectively, the non-disclosure of the full Social Impact Assessment, alongside evidence of existing negative impacts, results in an incomplete and unreliable assessment. This scenario not only obstructs a lawful determination but also reinforces the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual impacts related to the proposed development is fundamentally inadequate and does not reflect the true scale of change or the sensitivity of the surrounding environment. The West Lewis coastline is marked by its open Atlantic horizon and an undeveloped character that conveys a strong sense of remoteness. The close proximity of large-scale turbines to the shoreline would introduce a continuous industrial presence, fundamentally altering this character and leading to a permanent and irreversible transformation of the landscape.

This application fails to capture the extent of the visual change that would occur. The size and location of the turbines would dominate views from residential areas, historic sites, and well-frequented coastal locations, adversely affecting visual amenity and undermining the essential qualities of naturalness and remoteness. The assessment does not effectively communicate the significance of these impacts within such a sensitive landscape.

Moreover, there are methodological issues concerning the selection and depiction of visual viewpoints. Evidence indicates that the viewpoints chosen may not adequately reflect the most sensitive receptors or worst-case scenarios, particularly regarding key cultural heritage sites and areas of high landscape value. Consequently, this raises the possibility that the visual impact has been underestimated, compromising the reliability of the assessment.

Another critical shortcoming is the lack of consideration for the interconnected relationship between landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a wider landscape context, linked visually and spatially to the Atlantic horizon. Treating these as isolated features neglects their interdependence and leads to an incomplete evaluation of the impacts on their settings and cultural significance.

The industrialisation of the seascape would disrupt these connections, changing how heritage assets are perceived and their relation to the natural horizon. This change signifies not only a visual impact but also a broader cultural and spatial detriment that has not been adequately addressed in the application.

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4 regarding the protection of natural areas and historic assets. The degree of change is at odds with the requirement to maintain landscape character, visual amenity, and the setting of culturally important sites. The lack of a comprehensive worst-case assessment further weakens any assertions of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelmingly dominant and unavoidable. Therefore, the resulting change is profound and permanent, rather than something that could be reduced to an acceptable level through mitigation efforts.

Overall, the assessment fails to accurately depict the magnitude of impact, the sensitivity of the environment, and the interconnected nature of the landscape and heritage. These inadequacies prevent a trustworthy evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks associated with this proposal is insufficient and lacks the necessary detail to properly evaluate the potential environmental impacts. The project entails significant seabed preparation and installation activities within a challenging Atlantic environment, yet it lacks

comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that are to be developed after consent has been granted, which hinders any meaningful evaluation of their adequacy or effectiveness.

This reliance on vague future measures is especially troubling given the fragile nature of the surrounding environment. The West Lewis coastline is home to pristine coastal waters and crucial habitats that are susceptible to disruption from sediment and contamination. While the application recognises risks such as sediment mobilisation and the possibility of chemical or oil spills, it falls short in providing adequate details on how these incidents will be prevented, managed, or monitored.

Additionally, there is ambiguity regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without rigorous modelling and clearly articulated management strategies, it remains impossible to ascertain the extent, duration, or ecological ramifications of these impacts. This uncertainty also extends to the effects on marine species and habitats, which have already been identified as sensitive in the broader assessment.

The lack of comprehensive emergency response procedures exacerbates these concerns. By postponing contingency planning to a post-consent phase, the application does not allow for the evaluation of whether adequate safeguards are in place to respond to pollution incidents. This introduces a procedural risk and compromises the ability of the competent authority to properly assess environmental protection measures before making a determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the mandates of the Environmental Impact Assessment regime. Significant likely effects and mitigation strategies must be evaluated prior to granting consent, and without this information, a lawful determination cannot be achieved. Furthermore, the application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation strategies, the absence of detailed management plans, and the uncertainty surrounding potential impacts collectively render the assessment materially deficient. These significant shortcomings obstruct a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents substantial risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling for an extended duration is likely to disturb marine life over considerable distances, notably affecting species such as dolphins. The predicted disturbance to a significant portion of the local bottlenose dolphin population raises serious concerns, yet the application downplays these effects without providing adequate supporting evidence.

The waters off the West Lewis coast host a rich marine ecosystem alongside an active fishing industry. However, the assessment of fisheries and marine life appears insufficient, lacking a robust evaluation of ecological and socio-economic impacts. The application fails to convincingly demonstrate how these vital uses and habitats can be safeguarded from significant disruption.

A critical issue arises from the assumption that fishing activities can be displaced without adverse consequences. There is no evidence presented that alternative fishing grounds are available or accessible, nor that they can sustain any increased pressure. This gap is particularly concerning, as the risks of displacement could lead to overfishing in other areas, with broader economic repercussions for the local fishing fleet. The absence of a clear, evidence-based assessment means that the impacts on fisheries and livelihoods remain poorly understood.

The application acknowledges the need for licences to permit harm to European Protected Species, yet simultaneously characterises these impacts as negligible. This inconsistency undermines the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially where harm is anticipated to a level that necessitates legal authorisation.

Furthermore, the assessment neglects to consider cumulative impacts resulting from various pressures, including habitat disturbance, noise, and the displacement of fishing activity. Without a thorough evaluation of these combined effects, it is impossible to determine the overall impact on marine ecosystems and local socio-economic conditions.

From a policy standpoint, the proposal does not demonstrate compliance with National Planning Framework 4 or the National Marine Plan. It fails to illustrate that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thus obstructing any conclusion that the proposal constitutes sustainable development.

In summary, the lack of evidence concerning fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies render the assessment

incomplete and unreliable. These deficiencies prevent a comprehensive evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the project lacks completeness, particularly concerning the onshore infrastructure, which fails to fully account for the impacts of what constitutes a single integrated project. The separate evaluations of the offshore turbines and onshore works result in a fragmented understanding of the environmental and socio-economic effects, obscuring the true scale of the project's overall impact.

Onshore elements of the project involve significant activities, including cabling that traverses protected moorland, the construction of a substation near Stornoway, and necessary access infrastructure through sensitive landscapes. Notably, these works include excavation in areas of deep peat, especially within Barvas Moor, which serves as a vital carbon store and ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, which prevents a comprehensive understanding of the project's environmental footprint.

The application’s exclusion or deferral of onshore impact assessments hinders proper evaluation of cumulative effects. According to the Environmental Impact Assessment process, all project components must be evaluated collectively. However, the division between offshore and onshore assessments leads to an incomplete understanding of the combined impacts on peatlands, habitats, and surrounding communities.

Additionally, there are considerable risks posed to sensitive habitats, including machair systems and peatland environments that are protected by policy. The application does not clearly demonstrate that impacts on these habitats have been thoroughly assessed or that appropriate measures for avoidance have been implemented, resulting in a significant evidential gap regarding biodiversity protection.

Concerns also arise with respect to carbon balance. Disturbance of peatland has the potential to release stored carbon, leading to a carbon debt that may contradict the aims of renewable energy development. The application does not adequately address this issue or provide evidence that the overall carbon balance remains advantageous.

Furthermore, the routing of infrastructure through active croft land may create conflicts with existing land use and legal rights. There is insufficient evidence within the application to confirm that the necessary consents or processes have been initiated, prompting questions about deliverability and lawful implementation.

From a policy standpoint, the lack of a holistic assessment of the project and failure to

demonstrate adequate protection of peatlands, habitats, and land use interests stands in conflict with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further undermines the application.

In summary, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts collectively render this section of the application incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposed application introduces permanent red aviation lighting that will be visible over long distances, leading to a continuous and intrusive “wall of light” effect across the western horizon. This change fundamentally alters the night-time environment, yet the assessment of dark skies and nocturnal wildlife is entirely absent from the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which contribute significantly to environmental quality, cultural identity, and tourism value. The failure to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of residents and visitors is a substantial omission, particularly given the importance of dark skies to the area’s identity and its emerging tourism sectors, such as astro-tourism.

Moreover, the application neglects to assess how the proposed lighting may affect nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are known to be highly sensitive to artificial lighting due to phototaxis, which can cause disorientation and increase collision risks. The absence of a lighting impact assessment or phototaxis study means that there is no evaluation of how aviation lighting might influence these species or lead to increased mortality. This gap is exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activity or the associated risks. Kittiwakes, which may forage or migrate at night, are also vulnerable to disorientation from artificial lighting, yet this risk has not been addressed. The lack of site-specific night-time data creates a critical deficiency in understanding the ecological impacts of the proposed development.

Without an assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt cannot be achieved, invoking the precautionary principle and hindering a lawful determination. From a policy standpoint, these omissions are inconsistent with National Planning Framework 4 regarding the protection of natural places and

environmental quality. Additionally, this failure undermines the comprehensive assessment of landscape and seascape impacts, as the character of night-time environments is integral to the overall ecological context.

In summary, the lack of any assessment of dark skies and nocturnal wildlife presents a significant evidential gap. The absence of baseline data, impact modelling, and species-specific analysis renders the application incomplete and incapable of supporting a lawful determination.

TOURISM

The assessment of tourism impacts presented in the application is significantly lacking, particularly in its failure to examine the economic and social repercussions for a vital sector of the Isle of Lewis economy. Tourism, which heavily relies on the area's stunning coastline, almost untouched landscapes, dark skies, and sense of seclusion, has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and represents up to 16% of the island's economy. Despite the application noting that 86% of visitors are attracted by the scenery, it does not provide a quantified evaluation of how large-scale offshore infrastructure might affect visitor numbers, behaviour, or the overall economic contribution from tourism.

Moreover, the application neglects to model the potential impacts of the industrialisation of the seascape and deterioration of environmental quality on Tourism Gross Value Added and the broader economic resilience of the area. Without this essential analysis, it remains unclear whether the proposed development would yield a net economic benefit or negatively affect this established and expanding sector.

The role of environmental quality in enhancing tourism is another critical oversight, as unspoiled landscapes and dark skies significantly contribute to the visitor experience, particularly in emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment amplifies this shortcoming, creating a considerable gap in understanding the effects on a vital and growing component of the local economy.

In an island community where economic diversification is limited, the failure to assess tourism impacts carries broader ramifications for employment, local enterprises, and the sustainability of the community. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been thoroughly evaluated, as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not illustrate compliance with National Planning Framework 4, particularly concerning economic impact and the necessary demonstration of net benefit. It also contradicts strategic objectives that designate

tourism as a priority growth sector, failing to provide adequate evidence for the competent authority to evaluate the economic implications of the proposal.

Collectively, the shortcomings in quantifying tourism impacts, assessing environmental influences on visitor behaviour, and acknowledging the island's economic dependence result in a significant evidential gap. This deficiency obstructs a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the requirements of sustainable development, as assessed against statutory duties, national policy, and evidential standards. It echoes the core issues of the 2008 refusal of the Lewis Wind Power proposal, which was deemed unacceptable due to the scale of industrialisation. This current application is presented under a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant gaps in the evidential basis for the determination of this application. The reliance on an undefined design envelope, unspecified mitigation measures, and the absence of key impact pathways, including nocturnal wildlife and full onshore infrastructure effects, render the Environmental Impact Assessment incomplete. Consequently, this lack of comprehensive data hampers the ability to fully understand the likely significant effects or residual impacts.

Moreover, there are procedural shortcomings that must be addressed. The failure to provide a compliant Island Communities Impact Assessment is a breach of the statutory duty under the Islands (Scotland) Act 2018. Additionally, the incomplete Social Impact Assessment represents a material omission that impedes the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience.

The proposal is inconsistent with National Planning Framework 4, which calls for the protection of biodiversity, natural places, and cultural heritage. It does not adequately demonstrate that the health and wellbeing impacts are acceptable, nor does it provide evidence of a net economic benefit due to the lack of tourism impact modelling. The failure to properly assess the cumulative impact of both offshore and onshore elements obscures important effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Incomplete assessments concerning marine ecology, seabirds, protected species, and marine mammals contain inconsistencies that fail to meet the evidential

threshold needed to exclude adverse effects beyond reasonable scientific doubt. This necessitates the application of the precautionary principle, preventing a lawful conclusion regarding the acceptability of impacts.

The proposal would also lead to substantial and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, and disruptions to cultural and visual relationships, along with impacts on tourism, represent permanent effects that cannot be adequately mitigated.

In summary, the application is procedurally and substantively unfit for determination. The extensive deficiencies in information, combined with conflicts with policy and unresolved environmental risks, obstruct a lawful and evidence-based decision. Therefore, it is requested that consent for the Spiorad na Mara Offshore Wind Farm application be refused in its entirety.

Additional Comments

This proposal is shocking and deeply troubling to the local community and those who travel, work and enjoy time in Lewis. The fact that it has been allowed to continue this far is appalling and all plans should be thrown out. The destruction of Scotland's wild areas for these "green" projects is not green at all and to the detriment of local wildlife, ecology and communities.

Member of Public 206

Objection To Spiorad na Mara Offshore Wind Farm
References: MD-00011742 & MD-00011743

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. A thorough review of the Environmental Impact Assessment Report and accompanying documentation has identified significant deficiencies in planning, environmental, cultural, and procedural aspects of the proposal. The site is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The scale, proximity, and design of the proposed development raise serious concerns about its compatibility with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for a lawful decision. Essential environmental data is absent, baseline information is both limited and inconsistent, and several key elements of the proposal are not clearly defined. The employment of a flexible design framework obscures the understanding of likely significant effects, while the reliance on unspecified mitigation measures renders their effectiveness unassessable. Consequently, the provided documentation fails to facilitate a comprehensive understanding of the environmental, cultural, or community impacts, and the claims of negligible or non-significant effects are unsupported by robust evidence.

There are substantial conflicts with existing policies. The proposal seems at odds with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. These discrepancies directly challenge the statutory tests required for consent and hinder the competent authority's ability to determine whether the development is acceptable from a policy standpoint.

The unprecedented scale of the proposed development in this area raises considerable concerns, particularly regarding landscape capacity, visual dominance, and environmental impact, due to the large turbines being positioned close to the shoreline. In light of the insufficient information, reliance on undefined mitigation measures, evidential shortcomings, and clear policy non-compliance, it is evident that the

application is incomplete and unable to support a lawful determination. Under these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed, lacking a complete and transparent account of the anticipated environmental consequences of the proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific turbine sizes, layouts, or configurations, creates considerable uncertainty. This variability undermines the integrity of the assessment and means that the impacts outlined may not accurately reflect the final development. Consequently, both the public and the competent authority are left without a clear understanding of the actual environmental effects.

The application heavily depends on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent on the premise that environmental harm will be managed later impedes any substantial evaluation of effectiveness or assessment of residual impacts. This postponement of critical information until after consent is granted is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation measures be clearly established before a decision is made.

Significant evidential gaps persist, including deficiencies in baseline data, methodological limitations, and reliance on assumptions rather than site-specific evidence. These issues generate uncertainty about the magnitude and significance of impacts, especially where conclusions regarding negligible or non-significant effects lack robust supporting data. The failure to provide adequate information hinders a proper understanding of cumulative and worst-case impacts and introduces scientific uncertainty that does not align with statutory obligations.

As a result, the application does not fulfil the evidential requirements set by the Habitats Regulations, which necessitate the exclusion of adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, especially in relation to biodiversity protection and environmental integrity, as it cannot be shown that impacts have been thoroughly assessed or that suitable safeguards are established.

Overall, the reliance on an undefined design envelope, the lack of specified mitigation, and the inadequacies in baseline data collectively render the Environmental Impact

Assessment Report unreliable and incomplete. These shortcomings preclude a lawful and rigorous assessment of environmental effects, leaving the competent authority unable to make an informed determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application does not sufficiently address the assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. It provides a narrative account of the project's evolution rather than a structured comparison of realistic alternatives based on their environmental effects. This method does not adequately demonstrate that less harmful options have been properly identified, assessed, and chosen over more damaging solutions.

Moreover, there is a lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, and design configurations. The failure to consider the placement of turbines further offshore, where visual, ecological, and coastal impacts might be reduced, is particularly concerning. The sensitivity of the West Lewis coastline highlights the critical importance of proximity to shore in assessing impacts, and without this analysis, it cannot be concluded that the proposed siting is the least damaging option available.

The inadequacies also extend to the assessments of cable routing and landfall, with insufficient evidence that alternative routes have been properly investigated to minimise impacts on sensitive receptors. This includes culturally and spiritually significant areas, such as Barvas Cemetery. The lack of a clear avoidance strategy coupled with the absence of comparative analysis suggests that the application does not apply mitigation by design but relies instead on post-design measures.

Consequently, the application fails to show that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This constitutes a breach of the established mitigation hierarchy, limiting the competent authority's ability to determine whether less harmful and more appropriate alternatives are available. The absence of a thorough alternatives assessment precludes any conclusion that the proposal is a sustainable or compliant solution with existing policies.

From a policy standpoint, this deficiency undermines adherence to National Planning Framework 4, particularly regarding the protection of natural places, cultural heritage, and community wellbeing. The omission of a structured and comparative assessment is a significant shortcoming that contributes to the conclusion that the application has not been adequately evaluated, thus preventing a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The application fails to present a thorough assessment of marine ecology and protected species, resulting in a lack of a complete and reliable understanding of ecological receptors within the West Lewis coastal environment. This area is noted for its high sensitivity and biological activity; however, the baseline data provided is incomplete, and the methodologies used do not adequately capture the presence, behaviour, and habitat use of species. Consequently, the assessment lacks a solid evidential foundation for evaluating potential impacts.

A significant gap in the assessment concerns otters, which are classified as a European Protected Species. The application does not sufficiently acknowledge or evaluate their active use of coastal regions for foraging and movement. The neglect of their core foraging range and behavioural patterns leads to an inadequate assessment of the potential impacts arising from construction disturbance, noise, and heightened activity. This oversight undermines the conclusions regarding the absence of significant effects on this species.

Further issues are evident in the evaluation of basking sharks, where the reliance on aerial surveys introduces considerable detection bias, particularly under Atlantic conditions. Such an approach likely underestimates their presence, especially when compared to established land-based observations that indicate a frequent presence in these waters. The failure to incorporate or adequately consider this data contributes to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological flaws result in findings of negligible or non-significant effects that are based on assumptions rather than robust evidence. The lack of sufficient baseline data also hampers a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty obscures the true scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the criteria set by the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify and assess protected species. The uncertainty introduced by these shortcomings precludes the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these circumstances, consent cannot be lawfully granted.

Overall, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These deficiencies obstruct a thorough evaluation of the impacts on marine ecology and protected

species, reinforcing the conclusion that the application lacks an adequate evidential basis.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is a vibrant cultural landscape where the environment, language, tradition, and community are deeply intertwined. However, the assessment of cultural heritage and community identity in the current application is fundamentally inadequate. It adopts a reductive view, treating heritage merely as a collection of isolated and static assets, rather than acknowledging their ongoing social, cultural, and spiritual significance within the community.

Culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas are essential as active places of burial and spiritual practice. Unfortunately, the assessment reduces these vital sites to static features, ignoring their continued use and meaning, as well as the impact of development on their settings. This mischaracterisation leads to an incomplete evaluation of cultural effects and disregards their importance in community life.

Furthermore, there is a notable absence of consideration for intangible cultural heritage, including the Gaelic language, local traditions, and the long-standing connection between the community and the coastal environment. These elements are central to the area's identity yet remain entirely overlooked in the assessment, representing a significant gap. Without their inclusion, the cultural impact of the development cannot be fully understood.

Community rights and engagement are also significant concerns. The Gaelic-speaking population embodies a distinct cultural identity, akin to that of Indigenous Peoples, yet the application lacks a process of Free, Prior and Informed Consent. This failure to engage meaningfully undermines the assessment's legitimacy and neglects established principles of participation in decisions affecting cultural and environmental interests.

Additionally, the absence of a compliant Island Communities Impact Assessment constitutes a critical procedural failure, as mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders the determination unlawful.

From a policy standpoint, these shortcomings place the proposal in direct conflict with National Planning Framework 4, particularly concerning the protection of historic assets and places. The neglect of both tangible and intangible heritage, along with the failure to recognise living cultural practices, clearly departs from policy requirements.

Collectively, the lack of assessment regarding living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential gap. The cultural impacts of the proposed development have not been adequately assessed, and the application does not provide a sufficient foundation for evaluating the true cultural cost of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of the visual impacts, seascape, and landscape is insufficient and does not properly account for the significant changes or the sensitivity of the environment. The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and profound sense of remoteness. The proposed large-scale turbines situated near the shoreline would introduce a pervasive industrial presence, drastically changing this character and leading to an irreversible transformation of the landscape.

The application fails to accurately depict the extent of this visual alteration. Due to the scale and proximity of the turbines, they would dominate sightlines from residential areas, historic landmarks, and popular coastal spots. This would have a direct effect on visual amenity and diminish the essential qualities of naturalness and remoteness. The evaluation does not adequately express the significance of this impact within the context of such a delicate landscape.

Moreover, there are concerns regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that the viewpoints chosen may not fully represent the most sensitive receptors or the most adverse scenarios, especially concerning important cultural heritage sites and landscapes of high value. This raises the possibility that the severity of visual impact has been understated, which compromises the reliability of the assessment.

An additional shortcoming is the neglect to evaluate the interconnected relationship between the landscape, seascape, and cultural heritage. Key sites like the Calanais Standing Stones and other Scheduled Monuments form part of a broader landscape context, linked through visual and spatial connections to the Atlantic horizon. The assessment treats these as separate entities rather than acknowledging their interrelation, leading to a partial understanding of the impacts on their cultural significance and setting.

The industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are experienced and severing their link to the natural horizon. This not only constitutes a visual impact but also a broader cultural and spatial detriment that has not been thoroughly assessed in the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4 regarding the protection of natural areas and historical assets. The magnitude of change is incompatible with the obligation to preserve landscape character, visual amenity, and the settings of culturally significant locations. The lack of a comprehensive worst-case assessment further undermines any assertion of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be both dominant and inescapable. Consequently, the resulting alteration is fundamental and permanent, rather than something that can be reduced to an acceptable level through mitigation efforts.

In summary, the assessment does not accurately portray the extent of impact, the environment's sensitivity, or the interconnectedness of landscape and heritage. These shortcomings hinder a dependable evaluation and reinforce the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application lacks crucial details needed to assess the risks associated with construction and pollution. It includes substantial seabed preparation and installation in a high-energy Atlantic setting, yet it does not provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it depends on mitigation and contingency measures to be created after consent, which hinders any meaningful evaluation of their adequacy and effectiveness.

This reliance on unspecified future measures raises concerns about the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are at risk from sediment disturbance and contamination. Although the application acknowledges potential risks, such as sediment mobilisation and accidental chemical or oil spills, it lacks sufficient information on prevention, control, or monitoring strategies.

There is significant uncertainty regarding the size and behaviour of sediment plumes resulting from seabed disturbances and cable installation. Without robust modelling and well-defined management strategies, it is impossible to assess the extent, duration, or ecological effects of these impacts. This uncertainty also extends to effects on marine species and habitats that have been identified as sensitive in the broader assessment.

Moreover, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application restricts the evaluation of whether adequate safeguards are available to manage pollution incidents. This introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures at the time of decision-making.

From a regulatory standpoint, delaying essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be assessed before consent is granted, and the absence of this information means that a lawful determination cannot be made. The application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the deficiencies in defined mitigation measures, detailed management plans, and clarity on potential impacts render the assessment materially inadequate. These issues prevent a comprehensive evaluation of construction and pollution risks and further indicate that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents significant deficiencies in its assessment of marine life and fisheries, failing to offer a comprehensive analysis of ecological and socio-economic impacts. Key concerns centre around the waters off the West Lewis coast, which are home to a diverse marine ecosystem and a vital fishing industry. The proposal does not convincingly demonstrate that these habitats and activities can be preserved without substantial disruption.

A major flaw is the presumption that fishing operations can be easily displaced without repercussions. The application does not provide any evidence that alternative fishing areas exist or are accessible, nor that they can handle increased pressure. This gap is critical, as displacing fishing efforts could lead to overfishing in other locations and may also have broader economic implications for the local fishing fleet. The lack of a detailed, evidence-based assessment obscures the understanding of potential impacts on fisheries and livelihoods.

Further risks to marine species arise from the construction activities, notably the high-energy hammer piling, which is expected to generate significant underwater noise. Such disturbance is anticipated to reach considerable distances, potentially impacting local populations of species such as dolphins. The predicted disturbance to a large segment of the local bottlenose dolphin population raises serious concerns, yet the application minimises the importance of these effects without adequate supporting data.

There is a troubling inconsistency within the application where it acknowledges the necessity for licenses to inflict harm on European Protected Species while simultaneously characterising impacts as negligible. This contradiction calls into question the credibility of the assessment and raises issues regarding adherence to the Habitats Regulations, especially in contexts where anticipated harm necessitates legal authorization.

Additionally, the assessment overlooks the cumulative effects of various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough evaluation of these combined factors, it remains impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not demonstrate conformity with National Planning Framework 4 or the National Marine Plan. It fails to establish that the development can coexist with current marine users or prevent significant negative impacts on marine biodiversity, thereby obstructing any assertion that the proposal constitutes sustainable development.

In summary, the combination of insufficient evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal contradictions within the assessment collectively render it incomplete and unreliable. These shortcomings hinder a proper evaluation of the potential consequences for marine life and fisheries.

TOURISM

The application does not sufficiently assess tourism impacts, failing to evaluate the economic and social consequences for a vital sector of the Isle of Lewis economy. Tourism thrives on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. While the application acknowledges that 86% of visitors are attracted by the scenery, it lacks a quantified assessment of how large-scale offshore infrastructure would influence visitor numbers, behaviours, or overall economic contributions.

Tourism has experienced remarkable growth, increasing from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. However, the application neglects to model how the industrialisation of the seascape and the degradation of environmental quality would impact Tourism Gross Value Added or the wider economic resilience. Without such analysis, it is impossible to ascertain whether the development would yield a net economic benefit or jeopardise a well-established and growing sector.

The assessment fails to recognise the significance of environmental quality in sustaining tourism, especially regarding the value of unspoiled landscapes and dark skies to the visitor experience, as well as emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this issue, creating a considerable gap in understanding the impacts on a recognised and expanding segment of the local economy.

Within the context of an island community that has limited economic diversification, the neglect to assess tourism impacts carries broader implications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been examined as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, particularly regarding economic impact and the necessity to show net benefit. It also conflicts with strategic objectives that designate tourism as a priority growth sector, failing to provide adequate evidence for the competent authority to evaluate the economic consequences of the proposal.

In sum, the inability to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and acknowledge the island's economic dependency culminates in a significant evidential gap. This deficiency obstructs a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development as defined by statutory obligations, national policies, and evidential standards. It echoes the significant issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was highlighted. This current application is presented under an enhanced policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and the wellbeing of local communities.

There are substantial deficiencies in the evidential basis for the proposal, including critical gaps in baseline data and the utilisation of an undefined design envelope. The application relies on unspecified mitigation measures and fails to consider essential impact pathways, such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and the effects on tourism. Consequently, the Environmental Impact Assessment remains incomplete, hindering the ability to fully comprehend likely significant effects or residual impacts.

Furthermore, the application contains notable procedural shortcomings. The lack of a compliant Island Communities Impact Assessment breaches the statutory requirements set out in the Islands (Scotland) Act 2018, and the failure to present a complete Social Impact Assessment is a significant omission. These shortcomings impede the competent authority's ability to evaluate the implications for community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal directly contravenes the National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural landscapes, or cultural heritage, nor does it provide evidence that health and wellbeing impacts are acceptable. Additionally, there is a failure to establish a net economic benefit due to the lack of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been appropriately assessed, clouding the understanding of impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and occasionally inconsistent. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and making a lawful conclusion regarding acceptable impacts unattainable.

This proposal would result in considerable and irreversible alterations to a particularly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual connections, and negative impacts on tourism would create permanent effects that cannot be adequately mitigated.

In conclusion, the application is unfit for determination both procedurally and substantively. The extent of information deficiencies, alongside conflicts with policy and unresolved environmental risks, obstructs the possibility of a lawful and evidence-based decision. The competent authority is urged to either refuse consent on these grounds or exercise the relevant regulatory powers to demand the missing information.

Therefore, a formal request is made for the complete refusal of the Spiorad na Mara Offshore Wind Farm application.

Member of Public 207

Objection To Spiorad na Mara Offshore Wind Farm
References: MD-00011742 & MD-00011743

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection is informed by a thorough review of the Environmental Impact Assessment Report and accompanying documentation, revealing significant deficiencies in planning, environmental considerations, cultural impacts, and procedural compliance. The development is situated off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

The unprecedented scale of the proposal introduces large turbines positioned in close proximity to the shoreline, raising substantial concerns regarding landscape capacity, visual impact, and environmental consequences. The application lacks a sufficient evidential foundation necessary for a lawful determination. It is characterised by missing critical environmental data, limited and inconsistent baseline information, and undefined key aspects of the proposal. The flexible design framework employed results in an inability to fully understand the likely significant effects of the development. Furthermore, the reliance on unspecified mitigation measures means that their potential effectiveness cannot be evaluated. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, undermining claims of negligible or non-significant effects due to lack of robust supporting evidence.

The proposal also exhibits clear and substantive conflicts with established policy. It appears misaligned with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. The application does not adequately demonstrate that it can meet national obligations for the protection of biodiversity, climate interests, and environmental integrity. These discrepancies directly challenge the statutory tests required for consent and hinder the competent authority's ability to deem the development acceptable in policy terms.

In light of these issues—insufficient information, undefined mitigation strategies, evidential shortcomings, and clear non-compliance with policy—the application is deemed incomplete and incapable of supporting a lawful determination. Therefore, the precautionary principle should be invoked in response to these concerns.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents substantial shortcomings that compromise its reliability and transparency in addressing the environmental effects of the proposal. A significant issue lies in the use of a flexible Project Design Envelope, which lacks specific commitments to turbine dimensions, layouts, or configurations. This uncertainty hampers a consistent application of worst-case scenarios, thereby questioning the integrity of the assessment and obscuring the true extent of environmental impacts from both the public and competent authorities.

The proposal's reliance on yet-to-be-defined mitigation measures, monitoring strategies, and management plans further complicates the situation. Seeking consent based on the premise that environmental harm will be mitigated at a later stage impedes any meaningful evaluation of effectiveness or residual impacts. This postponement of critical information until post-consent stages undermines the procedural integrity of the Environmental Impact Assessment regime, which mandates the clear establishment of likely significant effects and mitigation prior to determination.

Moreover, the application is marred by significant evidential deficiencies, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. Such shortcomings create uncertainty surrounding the scale and significance of impacts, especially where negligible or non-significant effects are asserted without robust supporting data. The lack of sufficient information hinders a comprehensive understanding of cumulative and worst-case impacts, leading to scientific uncertainties that conflict with statutory obligations.

Consequently, the application fails to meet the evidential threshold required under the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This situation activates the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it does not convincingly show that impacts have been thoroughly assessed or that adequate safeguards are in place.

In summary, the combination of an undefined design envelope, lack of specified mitigation, and gaps in baseline data results in an Environmental Impact Assessment Report that is both unreliable and incomplete. These deficiencies obstruct a lawful and thorough assessment of environmental effects and leave the competent authority unable to make a determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The proposed development raises significant concerns due to the inadequacy of the assessment of alternatives, which fails to comply with the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives based on their environmental effects, the application presents a narrative of project development that does not adequately demonstrate that less harmful options have been properly identified and evaluated in favour of more damaging solutions.

There is a glaring lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not convincingly show that the developer has genuinely considered positioning the turbines further offshore, where the potential for reducing visual, ecological, and coastal impacts would likely increase. Considering the sensitivity of the West Lewis coastline, along with the crucial role that proximity to shore plays in determining impact, the failure to conduct such an analysis means that it cannot be concluded that the proposed siting is the least damaging alternative.

The shortcomings are further evident in the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly explored to mitigate impacts on sensitive receptors, including culturally and spiritually significant sites such as Barvas Cemetery. The absence of a clear strategy for avoidance and the lack of comparative analysis highlight that mitigation by design has not been implemented. Instead, the application relies heavily on post-design mitigation measures.

Consequently, the application does not sufficiently demonstrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This failure to adhere to the established mitigation hierarchy hinders the competent authority's ability to ascertain whether less harmful and more suitable alternatives are available. Without a robust assessment of alternatives, it cannot be claimed that the proposal is sustainable or compliant with policy.

From a policy standpoint, this significant deficiency undermines adherence to the National Planning Framework 4, especially concerning the protection of natural environments, cultural heritage, and community wellbeing. The absence of a systematic and comparative assessment represents a critical omission that leads to the overall conclusion that the application has not been properly evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is seriously flawed, failing to deliver a comprehensive and dependable understanding of ecological receptors in the West Lewis coastal environment. This area is recognised as a highly sensitive and biologically rich marine system, yet the baseline data provided is lacking, and the methodologies employed do not adequately document species presence, behaviour, and habitat utilisation. Consequently, the assessment lacks a solid evidential foundation for evaluating potential impacts.

Notably, there is a significant oversight concerning otters, which are a European Protected Species. The application neglects to properly acknowledge and assess their use of coastal areas for foraging and movement. The failure to consider their core foraging range and behavioural patterns results in an inadequate evaluation of the potential impacts of construction disturbance, noise, and increased activity, thereby undermining any claims regarding the absence of significant effects on this species.

Additionally, the assessment of basking sharks reveals further weaknesses, as reliance on aerial surveys introduces considerable detection bias, especially under Atlantic conditions. This methodology is likely to lead to an underestimation of their presence, especially when contrasted with established land-based observations that indicate frequent usage of these waters. The failure to properly incorporate or consider such crucial data results in an incomplete baseline, ultimately diminishing the credibility of the conclusions drawn.

The limitations in methodology mean that any conclusions suggesting negligible or non-significant effects are based on assumptions rather than rigorous evidence. The insufficient baseline data also inhibits a meaningful assessment of cumulative and indirect impacts, which include seasonal variations and broader ecosystem interactions. This creates ambiguity regarding the true extent of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to adequately identify or assess protected species. The uncertainty introduced by these deficiencies obstructs the ability to exclude adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, granting consent would not be lawful.

In summary, the combination of incomplete baseline data, inadequate methodologies, and unsupported conclusions renders the assessment unreliable. These significant deficiencies impede a thorough evaluation of impacts on marine ecology and protected

species, reinforcing the conclusion that the application lacks a sufficient evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The development is situated within key foraging areas and migratory pathways on the west coast of the Isle of Lewis, which supports internationally important seabird populations that are already in decline. However, the ornithological assessment fails to adequately demonstrate that these species will not be adversely affected. It does not robustly evaluate the implications of displacement, collision risk, or habitat loss, leading to significant gaps in evidence and internal inconsistencies that undermine its conclusions.

A critical contradiction exists within the application; the developer asserts that there will be no significant adverse effects while simultaneously putting forth a Habitats Regulations derogation case, which is only necessary when significant harm is expected. This inconsistency raises questions about the reliability of the assessment and indicates that its conclusions are not backed by the underlying evidence. Furthermore, the assessment lacks sufficient evidence to confirm that seabirds associated with protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not fully recognised, and reliance on modelling approaches introduces uncertainty, particularly for declining species such as Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, especially given the incomplete baseline data and the lack of comprehensive understanding of behavioural responses.

The siting of turbines within a recognised migratory corridor poses an additional risk, creating a barrier in a primary flight path used by species travelling between the United Kingdom and Iceland. The application does not sufficiently assess the long-term implications of sustained mortality within this corridor or the potential consequences for species with relatively small global populations. From a regulatory perspective, the application does not meet the evidential threshold required to ascertain that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data gaps and modelling limitations, means that the standard of beyond reasonable scientific doubt has not been satisfied. This situation engages the precautionary principle, obstructing a lawful conclusion in favour of consent.

These deficiencies also represent a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected directly conflicts with national policy. Collectively, the assessment is deemed unreliable due to methodological weaknesses, internal inconsistency, and insufficient

evidence. These shortcomings hinder a thorough evaluation of impacts and contribute to the overall determination that the application does not meet the statutory requirements necessary for support.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage is fundamentally flawed, as it overlooks the West Lewis coastline as a dynamic cultural landscape where tradition, language, community, and environment are deeply intertwined. The assessment treats heritage as a collection of isolated and static features, neglecting their ongoing social, cultural, and spiritual significance within the community.

A major shortcoming is the assessment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are places of active burial and spiritual practice, yet the assessment fails to acknowledge their continued relevance, instead categorising them as mere static assets. This mischaracterisation leads to an incomplete analysis of cultural impacts and disregards their integral role in community life.

Moreover, the evaluation neglects intangible cultural heritage, including the Gaelic language and local traditions, as well as the enduring relationship between the community and the coastal environment. These elements are vital to the area's identity but have been completely overlooked in the assessment, marking a significant gap in understanding the cultural impact of the development.

Concerns also arise regarding the rights of the community and the level of engagement in the assessment process. The Gaelic-speaking population possesses a unique cultural identity that aligns with the characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. The lack of meaningful engagement calls into question the legitimacy of the assessment and fails to adhere to the principles of participation regarding decisions that affect cultural and environmental interests.

Another critical oversight is the failure to conduct a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders a lawful determination impossible.

From a policy standpoint, these shortcomings place the proposal in direct opposition to the National Planning Framework 4, particularly concerning the safeguarding of historic assets and places. The failure to account for both tangible and intangible heritage,

alongside the disregard for living cultural practices, signifies a clear deviation from established policy requirements.

Ultimately, the neglect of living heritage, intangible cultural values, community rights, and necessary statutory assessments results in a substantial evidential void. The cultural impacts of the proposed development have not been adequately evaluated, leaving the application lacking a solid foundation for understanding the true cultural cost involved.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency regarding the Social Impact Assessment fundamentally undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when there is potential for disruption to community character and functioning. The developer's decision not to disclose the full dataset means that the application does not provide a complete evidential basis for evaluating the balance between benefits and harm.

Evidence suggests that residents are currently experiencing notable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts, which are based on direct engagement with the community, are not speculative. Nonetheless, the failure to make the full assessment available prevents proper scrutiny of these findings and diminishes the ability to assess their significance within the decision-making framework.

Moreover, the proposal has been viewed as a direct threat to community identity and cohesion, with the developer's findings indicating a risk of “cultural loss.” However, these implications have not been adequately incorporated into the primary application, nor have they been accorded the necessary weight. The withholding of the complete Social Impact Assessment obscures the genuine human and social costs associated with the proposed development.

From a policy standpoint, the application falls short of demonstrating adherence to National Planning Framework 4 concerning health and wellbeing. Developments are required to foster positive health outcomes and mitigate harm; however, the evidence at hand suggests existing negative effects that have not been fully revealed. Without the full assessment, it is impossible to establish compliance with this policy.

The procedural consequences of this omission are substantial. The competent authority is unable to conduct a thorough socio-economic and health evaluation in the absence of access to the complete Social Impact Assessment. This represents a

significant gap within the application and a failure to satisfy the evidential standards demanded by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, in conjunction with evidence of existing adverse impacts, renders the assessment both incomplete and unreliable. This ultimately hinders a lawful determination and reinforces the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The application presents significant deficiencies in its assessment of seascape, landscape, and visual impacts, failing to adequately capture the extent of change and the sensitivity of the environment. Notably, the West Lewis coastline features an open Atlantic horizon, an undeveloped character, and a pronounced sense of remoteness. The planned installation of large-scale turbines near the shoreline would introduce an overwhelming industrial presence, fundamentally changing this character and leading to a permanent and irreversible transformation of the landscape.

The assessment does not sufficiently represent the magnitude of the anticipated visual changes. Due to the scale and proximity of the turbines, they would dominate the views from residential areas, historic sites, and popular coastal locations. This would severely impact visual amenity and diminish the defining characteristics of naturalness and remoteness. Moreover, the assessment fails to adequately convey the level of impact or its significance within such a sensitive landscape.

Concerns also arise regarding the methodology employed in the selection and presentation of visual viewpoints. There is evidence to suggest that these viewpoints may not fully encompass the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This oversight raises the possibility that the extent of visual impact has been underestimated, thereby compromising the reliability of the assessment.

A critical shortcoming is the failure to evaluate the interconnectedness of landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a wider landscape setting, connected through visual and spatial relationships to the Atlantic horizon. The assessment mistakenly treats these as isolated assets, neglecting their interdependence and resulting in an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are perceived and severing their connection to the natural horizon. This change represents not only a visual impact but also a broader cultural and spatial

detriment that has not been sufficiently addressed within the application.

From a policy standpoint, the proposal contravenes the National Planning Framework 4, particularly regarding the safeguarding of natural environments and historic assets. The degree of change proposed is at odds with the requirement to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertion of compliance with policy.

Additionally, it is evident that the identified impacts cannot be effectively mitigated. The turbines' size, height, and proximity would ensure their presence remains dominant and unavoidable. Consequently, the resulting change is fundamental and permanent, incapable of being reduced to an acceptable level through mitigation efforts.

In summary, the assessment fails to accurately represent the scale of the impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings preclude a reliable evaluation and reinforce the conclusion that the proposal is inconsistent with the necessary protections for this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks essential details for assessing construction and pollution risks, failing to meet the necessary standards for evaluating likely environmental impacts. It involves significant seabed preparation and installation work in a high-energy Atlantic environment, yet no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans have been submitted. Instead, the application depends on unspecified mitigation and contingency measures to be developed after consent, which obstructs any meaningful assessment of their effectiveness or adequacy.

This reliance on undefined future measures is particularly alarming due to the sensitivity of the West Lewis coastline, known for its clean coastal waters and crucial habitats that are susceptible to sediment disturbance and pollution. While the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it does not furnish adequate information on how these risks will be prevented, controlled, or monitored.

There is considerable uncertainty concerning the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without thorough modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty extends to potential effects on marine species and habitats previously identified as sensitive in the broader assessment.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent, the application hinders the evaluation of whether proper safeguards are established to address pollution incidents. This approach introduces procedural risk and weakens the ability of the competent authority to review environmental protection measures before making a determination.

From a regulatory standpoint, the delay in establishing critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant likely effects and mitigation must be evaluated prior to consent, and without this information, a lawful determination is unachievable. Additionally, the application fails to demonstrate compliance with policy standards concerning environmental protection and water quality.

Overall, the absence of clearly defined mitigation measures, the lack of detailed management plans, and the uncertainty regarding potential impacts render the assessment fundamentally deficient. These shortcomings obstruct a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and a thriving fishing industry. However, the current application does not adequately protect these vital habitats or activities, nor does it provide a thorough assessment of the ecological and socio-economic impacts.

A major concern is the assumption that fishing can be relocated without any negative effects. The application lacks evidence showing that alternative fishing grounds are available and can handle additional strain. This is a crucial gap, as displacing fishing activities could lead to overfishing in other areas and harm the local fishing economy. Without a solid, evidence-based evaluation, the potential impacts on fisheries and the livelihoods dependent on them remain unclear.

The proposed development also poses serious risks to marine life, especially due to the underwater noise produced during construction. Extended periods of high-energy hammer piling are expected to disturb marine species over large distances, particularly dolphins. The anticipated disruption to a significant portion of the local bottlenose dolphin population is troubling. However, the application tends to minimise the importance of these disturbances without adequate supporting evidence.

There exists a clear contradiction within the application regarding the need for licenses

to harm European Protected Species while simultaneously claiming that the impacts are negligible. This inconsistency undermines the reliability of the assessment and raises questions about compliance with the Habitats Regulations, especially when anticipated harm might necessitate legal permissions.

Furthermore, the assessment fails to address cumulative impacts that arise from various pressures, such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough examination of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not prove adherence to the National Planning Framework 4 or the National Marine Plan. It falls short of demonstrating that the development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, obstructing any conclusion regarding its sustainability.

In summary, the lack of evidence concerning fishing displacement, the downplay of acoustic impacts, and internal contradictions render the assessment incomplete and unreliable. These shortcomings hinder a robust evaluation of the effects on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents a fragmented assessment of onshore infrastructure, failing to acknowledge the interconnected nature of the offshore turbines and onshore works. This separation obscures the complete environmental and socio-economic impacts that arise from what is fundamentally a single integrated project. The onshore components involve significant activities, including cabling across protected moorland and the construction of a substation near Stornoway, alongside access infrastructure through sensitive landscapes. Notably, excavation will occur in areas of deep peat, particularly within Barvas Moor, which is a critical carbon store and ecologically sensitive habitat. The current application lacks a thorough examination of these effects, leading to an incomplete understanding of the overall environmental footprint of the project.

By choosing to exclude or delay the assessment of onshore impacts, the application hinders a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all aspects of a project be considered together. However, the disjointed treatment of offshore and onshore elements means that the combined implications for peatlands, habitats, and local communities remain unclear.

Moreover, there are considerable risks to sensitive habitats such as machair systems

and peatland environments, which enjoy policy protection. The application does not sufficiently demonstrate that impacts on these vital ecosystems have been adequately assessed or that effective avoidance measures have been put in place, revealing a significant gap in evidence concerning biodiversity protection.

Concerns are also raised regarding the carbon balance associated with the proposal. The disturbance of peatland releases stored carbon, which could result in a carbon debt that contradicts the renewable energy development objectives. The application fails to address this matter adequately or to show that the overall carbon balance is indeed beneficial.

The routing of infrastructure through active croft land introduces further potential conflicts with established land use and legal rights. There is no evidence presented that the requisite consents or processes have been initiated, casting doubt on both the deliverability and lawful implementation of the project.

From a policy standpoint, the lack of a comprehensive assessment and failure to demonstrate the protection of peatlands, habitats, and land use interests stand in direct conflict with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated fundamentally weakens the application.

In summary, the division of project components, absence of thorough assessment, and lack of evidence concerning environmental and land use impacts culminate in an application that is incomplete and unreliable, thereby obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment fails to address the assessment of dark skies and nocturnal wildlife, representing a significant oversight. The West Lewis coastline boasts exceptionally dark skies, which are crucial to the area's environmental quality, cultural identity, and tourism appeal. The introduction of permanent red aviation lighting, visible from considerable distances, would create a continuous and intrusive "wall of light" across the western horizon, fundamentally changing the night-time environment.

The application neglects to evaluate the impacts of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This lack of consideration is critical, given the significance of dark skies for the identity of the area and the emerging sector of astro-tourism. Such omissions create a distinct gap in the overall landscape and environmental assessment.

Moreover, there is no analysis of the impacts on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly susceptible to artificial lighting due to phototaxis, which can lead to disorientation and an increased risk of collision. The application does not provide any lighting impact assessment or phototaxis study, failing to evaluate how aviation lighting might affect these species or lead to increased mortality rates.

This oversight is further exacerbated by the dependence on daytime survey data in the ornithological assessment, which does not account for nocturnal activity or the associated risks. Species such as Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been investigated. The lack of site-specific night-time data results in a crucial gap in understanding the ecological impacts.

Without an assessment of nocturnal impacts, it remains impossible to ascertain whether protected species or designated sites could be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, thus engaging the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission is inconsistent with National Planning Framework 4, which pertains to the protection of natural environments and the quality of the surroundings. Additionally, it undermines the comprehensive assessment of landscape and seascape impacts, as the character of night-time is an integral aspect of the environment.

In summary, the absence of any evaluation regarding dark skies and nocturnal wildlife represents a substantial evidential gap. The failure to provide baseline data, impact modelling, and species-specific analyses renders the application incomplete and incapable of facilitating a lawful determination.

TOURISM

The analysis of tourism impacts within the application is fundamentally inadequate, failing to properly assess the economic and social ramifications for a crucial sector of the Isle of Lewis's economy. With tourism significantly relying on the area's wild coastline, near-pristine landscapes, dark skies, and unique sense of remoteness, it is notable that 86% of visitors are attracted primarily by scenery. Nevertheless, the application lacks a quantified assessment regarding how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution.

The tourism sector has seen substantial growth, increasing from £65 million in 2017 to over £81.5 million, thereby supporting more than 1,000 jobs and comprising up to 16% of the island's economy. However, the application neglects to model the potential impacts of the seascape's industrialisation and the consequent loss of environmental quality on Tourism Gross Value Added and the wider economic resilience of the region. Such an analysis is crucial to ascertain whether the proposed development would yield a net economic benefit or instead jeopardise an established and thriving sector.

Furthermore, the assessment does not take into account the significance of environmental quality in bolstering tourism, particularly the value of unspoiled landscapes and dark skies to the visitor experience, as well as to emerging markets such as nature-based tourism and astro-tourism. The failure to include a Dark Skies Assessment exacerbates this oversight, resulting in a substantial gap in understanding the impacts on a recognised and expanding segment of the local economy.

In a context where the island community exhibits limited economic diversification, the lack of evaluation regarding tourism impacts carries broader consequences for employment, local businesses, and the sustainability of the community. The omission of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been examined, as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, particularly regarding economic impact and the necessity of demonstrating net benefit. It also contradicts strategic objectives that recognise tourism as a priority growth sector, failing to provide adequate evidence for the competent authority to assess the economic ramifications of the proposal.

In summary, the overall inadequacy in quantifying tourism impacts, failing to assess the environmental factors influencing visitor behaviour, and disregarding the economic dependency of the island results in a significant evidential gap. This ultimately hinders a thorough evaluation of economic effects and supports the assertion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal represents significant shortcomings in meeting the principles of sustainable development when evaluated against national policy, statutory obligations, and evidential benchmarks. This application mirrors the main concerns that resulted in the rejection of the Lewis Wind Power proposal in 2008, highlighting unacceptable levels of industrialisation. This current proposal is put forth

under a more robust policy framework that prioritises biodiversity, peatland conservation, landscape integrity, and the wellbeing of the community.

The evidential foundation for the application is incomplete and unreliable. There are notable deficiencies in baseline data, an unclear design envelope, unspecified mitigation measures, and key impact pathways that have not been addressed, including those related to nocturnal wildlife, comprehensive onshore infrastructure, and tourism consequences. As a result, the Environmental Impact Assessment fails to provide a thorough understanding of potential significant effects or residual impacts.

Procedural errors are also evident. The lack of a compliant Island Communities Impact Assessment violates the statutory requirements set out in the Islands (Scotland) Act 2018, while the omission of a complete Social Impact Assessment is a significant flaw. These gaps hinder the competent authority from evaluating the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Moreover, the proposal conflicts with the National Planning Framework 4. It does not adequately ensure the protection of biodiversity, natural sites, and cultural heritage, nor does it demonstrate that health and wellbeing impacts are acceptable. Additionally, it lacks evidence of a net economic benefit, particularly due to the absence of tourism impact assessments. The assessment of cumulative impacts from both offshore and onshore components is inadequate, leading to obscured effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Evaluations concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also internally inconsistent. The necessary evidential threshold to affirm the absence of adverse effects beyond reasonable scientific doubt has not been fulfilled, invoking the precautionary principle and thereby precluding a lawful determination that impacts are acceptable.

Additionally, the proposal would cause substantial and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruptions to cultural and visual connections, and adverse effects on tourism represent permanent changes that cannot be sufficiently mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The extent of information deficiencies, coupled with policy inconsistencies and unresolved environmental risks, obstructs a lawful, evidence-

based decision. It is requested that the application for the Spiorad na Mara Offshore Wind Farm be rejected in its entirety.

Additional Comments

The rampant destruction and industrialisation of rural Scotland will be the ruin of Scotland.T

Member of Public 208

Objection To Spiorad na Mara Offshore Wind Farm
References: MD-00011742 & MD-00011743

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. An analysis of the Environmental Impact Assessment Report and accompanying documentation reveals significant planning, environmental, cultural, and procedural deficiencies. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise regarding the scale, proximity, and design of the proposal, particularly in relation to its compliance with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for a lawful determination. There is a notable absence of critical environmental data, and the baseline information provided is limited and inconsistent. Many key aspects of the proposal remain undefined. The reliance on a flexible design framework impedes a clear understanding of the likely significant effects, while the dependence on unspecified mitigation measures means that their effectiveness cannot be assessed. Consequently, the documentation fails to facilitate a full or informed understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidence.

Moreover, there are apparent and substantial conflicts with existing policies. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These discrepancies directly affect the statutory tests necessary for consent and hinder the competent authority's ability to determine the development's acceptability in policy terms.

The unprecedented scale of the proposal presents significant challenges, with large turbines located in close proximity to the shoreline, raising serious concerns about landscape capacity, visual dominance, and environmental impact. When considering the insufficiency of information, the reliance on undefined mitigation strategies, evidential weaknesses, and evident policy non-compliance, it becomes clear that the

application is incomplete and unable to support a lawful determination. Under these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary detail and transparency to accurately convey the potential environmental consequences of the proposal. The introduction of a flexible Project Design Envelope, which does not commit to precise turbine dimensions, layouts, or configurations, creates significant uncertainty. This uncertainty hinders a consistent assessment based on worst-case scenarios, undermining the integrity of the evaluation. Consequently, the presented impacts may not accurately represent what will ultimately be constructed, leaving both the public and the competent authority without a clear understanding of the true environmental effects.

The application places considerable reliance on mitigation measures, monitoring strategies, and management plans that have yet to be established. Seeking consent on the premise that environmental harm will be managed later obstructs any meaningful assessment of the effectiveness of these measures or the evaluation of residual impacts. This postponement of crucial information to stages following consent is procedurally unacceptable and runs counter to the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly defined prior to any determination.

Furthermore, there are notable gaps in the evidence provided, including insufficient baseline data and methodological limitations, leading to a reliance on assumptions rather than site-specific evidence. This results in uncertainty about the scale and significance of the impacts, especially where conclusions of negligible or non-significant effects are asserted without adequate supporting data. The lack of comprehensive information obstructs a clear understanding of both cumulative and worst-case impacts, introducing scientific uncertainty that is incompatible with statutory obligations.

As a result, the application does not meet the evidential standards required under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate compliance with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it cannot be established that the impacts have been thoroughly evaluated or that appropriate safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of

specified mitigation measures, and gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings preclude a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make an informed decision based on the information available.

ASSESSMENT OF ALTERNATIVES

The deficiencies in the assessment of alternatives are significant and warrant immediate attention. The application fails to meet the statutory requirements of the Environmental Impact Assessment regime, lacking a structured and reasoned comparison of viable alternatives based on their environmental impacts. Instead, it merely presents a narrative of project evolution, neglecting to demonstrate that less harmful options have been properly identified, assessed, and chosen over more damaging solutions.

There is a lack of transparent and evidence-based comparison regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not show that the developer has given serious consideration to positioning turbines further offshore, which would likely reduce visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline, the failure to conduct such an analysis hinders any conclusion that the proposed siting is the least damaging option.

The shortcomings also extend to the assessment of cable routing and landfall, where the evidence presented does not sufficiently explore alternative routes that could avoid or minimise impacts on sensitive receptors, including sites of cultural and spiritual significance such as Barvas Cemetery. The lack of a clear avoidance strategy and a comparative analysis indicates that mitigation by design has not been applied, resulting in a reliance on post-design mitigation measures.

Consequently, the application does not adequately demonstrate that environmental harm has been minimised through site selection, layout, and infrastructure routing. This failure to adhere to the established mitigation hierarchy means that the competent authority cannot ascertain whether less harmful and more appropriate alternatives exist. Without a thorough assessment of alternatives, it cannot be concluded that the proposal is sustainable or compliant with policy.

From a policy standpoint, these deficiencies undermine adherence to National Planning Framework 4, particularly regarding the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is

a material omission that contributes to the conclusion that the application has not been sufficiently evaluated and cannot support a lawful determination.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The procedural implications of the current application are substantial. The absence of the full Social Impact Assessment hinders the competent authority's ability to carry out a thorough socio-economic and health evaluation. This significant omission compromises the application's compliance with the evidential requirements set forth by the Environmental Impact Assessment regime.

Furthermore, the assessment of social impacts, health, and wellbeing is notably inadequate and lacks the necessary transparency for a lawful evaluation. Although the developer commissioned a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This gap in evidence prevents both the public and the competent authority from gaining a comprehensive understanding of the social risks highlighted by the developer's research.

Available summaries reveal that residents are currently experiencing measurable stress, anxiety, and concern stemming from the scale and proximity of the proposal. These impacts, drawn from direct engagement, are factual rather than speculative. The failure to disclose the complete assessment limits the opportunity for proper scrutiny of the findings, affecting the significance of these impacts in the decision-making process.

Additionally, there is evidence indicating that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" noted within the developer's own findings. Despite this, these impacts have not been adequately integrated into the main application or accorded the weight they warrant. The withholding of the full Social Impact Assessment obscures the genuine human and social cost associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A complete understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning may be compromised. The application fails to provide a comprehensive evidential basis to assess the balance between benefits and harm.

From a policy perspective, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Development must foster positive health outcomes while avoiding harm. However, the evidence presented indicates existing adverse effects that have not been fully disclosed, making it impossible to demonstrate compliance in the absence of the complete assessment.

In conclusion, the non-disclosure of the full Social Impact Assessment, along with the evidence of existing adverse impacts, results in an incomplete and unreliable assessment. This situation prevents a lawful determination, reinforcing the assertion that the application lacks sufficient information to proceed.

CONSTRUCTION AND POLLUTION RISKS

The proposal involves significant seabed preparation and installation works in a high-energy Atlantic environment, but the assessment of construction and pollution risks is lacking in detail needed for a thorough evaluation of likely environmental effects. There are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included with the application, which instead relies on the preparation of mitigation and contingency measures after consent. This reliance on undefined future actions raises serious concerns, particularly considering the sensitivity of the West Lewis coastline, which is home to clean coastal waters and vulnerable habitats at risk of sediment disturbance and contamination.

The application does acknowledge certain risks, such as sediment mobilisation and the potential for accidental chemical or oil spills, yet it fails to provide adequate information on how these risks will be prevented, controlled, or monitored effectively. Additionally, there is uncertainty surrounding the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. Without thorough modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of these disturbances. This uncertainty is compounded by potential effects on already identified sensitive marine species and habitats within the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures, which further exacerbates the concerns regarding environmental protection. By postponing contingency planning to a post-consent stage, the application limits the ability to evaluate whether adequate safeguards are in place to manage pollution events. This introduces procedural risks and diminishes the competent authority's capacity to assess environmental measures before a decision is made.

From a regulatory standpoint, deferring essential environmental safeguards conflicts with the requirements established by the Environmental Impact Assessment regime. Significant effects and mitigation measures must be evaluated prior to consent; if this information is not available, a lawful determination cannot be achieved. The application also does not demonstrate compliance with relevant policy requirements concerning environmental protection and water quality.

Overall, the lack of defined mitigation measures, detailed management plans, and clarity regarding potential impacts result in a materially deficient assessment. These shortcomings hinder a robust evaluation of construction and pollution risks, further substantiating the conclusion that the application remains incomplete.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is not complete and does not adequately consider the impacts of this integrated project. The offshore turbines and the onshore works are interconnected, yet they are evaluated separately, leading to a disjointed approach that hides the true scale of environmental and socio-economic effects.

Onshore elements include cabling through protected moorland, a substation near Stornoway, and access infrastructure through sensitive landscapes. These constructions involve excavating deep peat areas, particularly in Barvas Moor, which is crucial for carbon storage and is an ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, hindering a full understanding of the project's overall environmental footprint.

By omitting or delaying the assessment of onshore impacts, the application obstructs the proper evaluation of cumulative effects. The Environmental Impact Assessment process requires all components of a project to be evaluated together, but the division between offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities are not fully appreciated.

There are notable risks to sensitive habitats, including machair systems and peatland areas that have policy protection. The application does not prove that the impacts on these habitats have been properly assessed or that suitable avoidance measures have been implemented. This creates a significant gap in evidence regarding biodiversity protection.

The proposal also raises issues related to carbon balance. Disturbing peatland releases stored carbon, which could lead to a carbon debt, contradicting renewable energy goals. The application does not sufficiently address this concern or show that the overall carbon balance is beneficial.

Furthermore, routing infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application fails to provide evidence that necessary consents or processes have been started, which raises doubts about its deliverability and lawful execution.

From a policy standpoint, the failure to assess the project as a unified whole and to

ensure the protection of peatlands, habitats, and land use interests is in conflict with the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be avoided or mitigated weakens the application further.

Overall, the separation of project components, the lack of comprehensive assessment, and insufficient evidence regarding environmental and land use impacts make this portion of the application incomplete and unreliable, preventing a lawful determination.

TOURISM

The assessment of tourism impacts is insufficient and does not address the economic and social consequences for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness. Although the application notes that 86% of visitors are attracted by scenery, it fails to provide any quantitative analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or overall economic contributions.

Tourism has seen considerable growth, increasing from £65 million in 2017 to more than £81.5 million, which supports over 1,000 jobs and represents up to 16% of the island's economy. However, the application does not examine how the industrialisation of the seascape and deterioration of environmental quality would affect Tourism Gross Value Added or the wider economic resilience of the area. Without such an analysis, it is impossible to ascertain whether the development would offer a net economic benefit or harm an established and expanding sector.

Moreover, the assessment neglects to consider the significance of environmental quality in bolstering tourism, particularly the value of unspoiled landscapes and dark skies for visitor experience and emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, creating a considerable gap in understanding the impacts on a recognised and growing segment of the local economy.

In an island community with limited economic diversification, the failure to evaluate tourism impacts has broader implications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been analysed as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly regarding economic impact and the necessity to prove net benefit. It also contradicts strategic objectives that highlight tourism as a

priority growth sector and fails to provide adequate evidence for the competent authority to assess the economic implications of the proposal.

Overall, the inability to quantify tourism impacts, evaluate the environmental drivers of visitor behaviour, and consider the island's economic dependency leads to a significant evidential gap. This hinders a thorough assessment of economic effects and contributes to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a serious failure to meet the principles of sustainable development, as it falls short against statutory duties, national policies, and the required evidential standards. This application mirrors the fundamental issues that led to the rejection of the Lewis Wind Power proposal in 2008, as it presents a scale of industrialisation deemed unacceptable at that time. Despite being submitted under a more stringent policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, it does not address these critical concerns.

Crucial gaps exist within the evidential basis necessary for determination. The application lacks comprehensive baseline data, employs an undefined design envelope, relies on unspecified mitigation measures, and omits key impact pathways such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is insufficient, failing to allow for a thorough understanding of likely significant effects or residual impacts.

Additionally, significant procedural shortcomings are evident. The lack of a compliant Island Communities Impact Assessment constitutes a violation of statutory duties outlined in the Islands (Scotland) Act 2018, while the incomplete disclosure of the Social Impact Assessment represents a material omission. These shortcomings hinder the competent authority from fully evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal is also at odds with National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural places, and cultural heritage. Furthermore, it fails to establish that health and wellbeing impacts are acceptable and does not provide evidence of net economic benefits due to the lack of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been thoroughly assessed, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and may be significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and precluding a lawful determination that impacts are acceptable.

Moreover, the proposal would bring about substantial and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual relationships, and the negative effects on tourism present permanent impacts that cannot be mitigated to an acceptable degree.

In conclusion, the application is procedurally and substantively unfit for determination. The multitude of information deficiencies, coupled with conflicts in policy and unresolved environmental risks, obstructs a lawful and evidence-based decision. It is imperative that the competent authority either refuses consent on these grounds or invokes the necessary regulatory provisions to compel the submission of the outstanding information.

Thus, a formal request is made for the complete refusal of the Spiorad na Mara Offshore Wind Farm application.

Additional Comments

The proposed Spiorad na Mara offshore wind farm would have profound and irreversible negative impacts on the unique natural, cultural, and visual character of the Isle of Lewis and the wider Outer Hebrides.
Positioned just 5–13 kilometres offshore, the development (potentially comprising up to 65–66 turbines, each reaching heights of up to 180–380 metres including blade tip) would dominate the seascape and skyline from many coastal communities, including Arnol and other villages along the west coast. This industrial-scale intrusion would fundamentally alter the wild, unspoiled character of one of Scotland's most iconic and culturally significant landscapes, severely diminishing the area's outstanding natural beauty, sense of remoteness, and its deep connection to Gaelic heritage and maritime traditions.
Beyond visual harm, the project risks significant adverse effects on marine ecosystems through seabed disturbance from fixed foundations and cabling, potential impacts on marine mammals, seabirds, and fish stocks, and disruption to important fishing grounds. The cumulative effects with other proposed developments in the region would further erode the environmental quality that defines this special place.
While I acknowledge the stated climate benefits of renewable energy, the proximity of

this large-scale industrial development to a sensitive, low-density rural community means the local environmental, social, and cultural costs far outweigh any localised gains. The Spirit of the Sea (Spiorad na Mara) should remain a living cultural and natural asset, not be industrialised in this way.
I therefore strongly object to the consent application on the grounds of unacceptable landscape and seascape impact, harm to biodiversity, and damage to the cultural and economic well-being of the Isle of Lewis.

This version is short (suitable for the main body or a dedicated “Impact” section), balanced in tone, and focuses on key objection themes commonly raised (visual dominance, cultural/heritage value, marine environment). Feel free to customise it with your specific concerns (e.g., particular views from your village, personal experiences, or additional issues like tourism or noise).

Member of Public 209

Objection To Spiorad na Mara Offshore Wind Farm
References: MD-00011742 & MD-00011743

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under marine licensing and Environmental Impact Assessment frameworks. A review of the Environmental Impact Assessment Report and its supporting documentation reveals significant planning, environmental, cultural, and procedural deficiencies. The development is proposed off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise from the scale, proximity, and design of the project, challenging its compatibility with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis for a lawful determination. Missing critical environmental data, limited and inconsistent baseline information, and undefined key aspects of the proposal hinder a comprehensive understanding of its impact. The use of a flexible design framework obscures likely significant effects, while unspecified mitigation measures prevent assessment of their effectiveness. Consequently, the documentation does not facilitate a fully informed understanding of the environmental, cultural, or community impacts, and the assertion of negligible or non-significant effects lacks robust evidence.

Substantive policy conflicts are evident. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements for protecting biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests necessary for consent and jeopardise the ability of the competent authority to deem the development acceptable from a policy standpoint.

The unprecedented scale of the proposal, with large turbines situated near the shoreline, raises significant concerns about landscape capacity, visual dominance, and environmental impact. The combination of inadequate information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance illustrates that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally flawed, failing to deliver a comprehensive understanding of the ecological receptors in the West Lewis coastal environment, which is highly sensitive and biologically active. The baseline data provided is incomplete, and the methodologies used do not adequately capture the presence, behaviour, and habitat use of species. This inadequacy undermines the assessment's ability to furnish a solid evidential basis for evaluating potential impacts.

A critical gap exists concerning otters, classified as a European Protected Species, as the application does not sufficiently recognise or assess their use of coastal areas for foraging and movement. The omission of their core foraging range and behavioural patterns means the potential impacts of construction-related disturbances, noise, and increased activity have not been thoroughly evaluated. This limitation casts doubt on any conclusions suggesting there would be no significant effects on this species.

Furthermore, there are significant deficiencies in the assessment of basking sharks, where reliance on aerial surveys introduces substantial detection bias, particularly under Atlantic conditions. This methodology is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that indicate a frequent use of these waters. The failure to adequately incorporate or consider this data leads to an incomplete baseline and diminishes the reliability of the conclusions drawn.

Due to these methodological shortcomings, the assertions of negligible or non-significant effects rely on assumptions rather than robust evidence. The lack of sufficient baseline data also hampers a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty regarding the true scale of risks to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set by the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. The uncertainty introduced prevents the dismissal of adverse effects beyond a reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these circumstances, granting consent would not be lawful.

In conclusion, the combination of incomplete baseline data, flawed methodologies, and unfounded conclusions leads to an assessment that lacks reliability. These

deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species, culminating in the overarching determination that the application fails to provide a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application regarding seabird populations is fundamentally flawed, containing significant gaps and inconsistencies that challenge its validity. It is situated on the west coast of the Isle of Lewis, an area known for its internationally important seabird populations, which are already experiencing declines. The application fails to adequately demonstrate that these species will not be negatively impacted. Notably, the development is within critical foraging areas and migratory pathways, yet the assessment lacks a thorough evaluation of potential displacement, collision risk, and habitat loss.

A key contradiction exists within the application, as the developer claims there are no significant adverse effects while also submitting a Habitats Regulations derogation case, which is required only when significant harm is anticipated. This inconsistency raises concerns about the reliability of the assessment and suggests that the conclusions drawn are not backed by solid evidence. The assessment does not sufficiently prove that seabirds linked to protected sites like the Lewis Peatlands and St Kilda will be unaffected. The importance of these feeding grounds is inadequately addressed, and reliance on modelling introduces uncertainty, especially for declining species such as Kittiwakes and Fulmars. The methods used are likely to underestimate mortality, particularly due to incomplete baseline data and a lack of understanding regarding behavioural responses.

The placement of turbines in a recognised migratory corridor poses a considerable risk by acting as a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term consequences of increased mortality within this corridor or the potential impact on species with small global populations. From a regulatory viewpoint, the application does not satisfy the evidential threshold needed to assert no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, coupled with data deficiencies and modelling issues, indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle, making a lawful conclusion in support of consent impossible.

The identified deficiencies also breach the requirements of the National Planning Framework 4 regarding biodiversity protection and the conservation of natural assets. The failure to demonstrate that internationally significant seabird populations will remain unaffected places the proposal in direct opposition to national policy.

Collectively, these issues render the assessment unreliable due to internal contradictions, methodological flaws, and inadequate evidence, which hinder a comprehensive evaluation of impacts and lead to the conclusion that the application does not fulfil the statutory criteria needed for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment presented in this application is fundamentally inadequate, failing to recognise the West Lewis coastline as a living cultural landscape where environment, language, tradition, and community are deeply interconnected. The approach taken reduces heritage to isolated, static assets and neglects their ongoing social, cultural, and spiritual functions within the community.

A significant deficiency is evident in the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet they are inaccurately categorised as static features. This mischaracterisation overlooks their continued use and meaning, as well as the impact of development on their setting. Consequently, the cultural effects are evaluated incompletely, disregarding the integral role these sites play in community life.

Moreover, the assessment fails to address intangible cultural heritage, which includes the Gaelic language and local traditions, alongside the long-standing relationship between the community and its coastal environment. These elements are central to the area's identity but are omitted from the analysis, which represents a significant gap. Without including these factors, it is impossible to fully comprehend the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity that aligns with recognised characteristics of an Indigenous People. However, there has been no process of Free, Prior and Informed Consent undertaken. This lack of meaningful engagement undermines the assessment's legitimacy and does not adhere to established principles of participation concerning cultural and environmental interests.

Another critical issue is the absence of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot fulfil its legal obligations to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders any determination unlawful.

From a policy perspective, these shortcomings place the proposal in direct conflict with National Planning Framework 4, especially regarding the protection of historic assets

and places. The failure to consider both tangible and intangible heritage, along with the lack of recognition of living cultural practices, constitutes a clear deviation from required policy standards.

In summary, the overall neglect of living heritage, intangible cultural values, community rights, and statutory obligations leads to a significant evidential gap. The cultural impacts of the proposed development have not been adequately assessed, and the application fails to provide a sound basis for evaluating the true cultural cost associated with it.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's failure to publish the full Social Impact Assessment is a critical concern that undermines the evaluation of social impacts, health, and wellbeing related to the proposed development. While a Social Impact Assessment was commissioned and included focus groups with local residents, the lack of transparency surrounding this report creates a significant evidential gap. This omission hampers both public understanding and the competent authority's ability to assess the full extent of social risks identified in the developer's own research.

Evidence indicates that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts have been derived from direct engagement rather than speculation, yet the withholding of the complete assessment prevents thorough scrutiny of these findings and restricts the capacity to evaluate their significance in the decision-making process.

Furthermore, there are indications that the proposal threatens community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite this recognition, such impacts have not been adequately incorporated into the main application or given appropriate consideration. The lack of access to the full Social Impact Assessment obscures the real human and social costs associated with the development.

This deficiency of transparency also compromises the Environmental Impact Assessment process. It is crucial to have a complete understanding of social, economic, and health implications for developments of this magnitude, particularly when community character is at stake. Without the full dataset, the application lacks a comprehensive evidential basis necessary for weighing benefits against harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments are required to promote positive health outcomes and avoid harm; however, existing

adverse effects are evident and have not been fully revealed. Without the full assessment, compliance with this policy cannot be established.

The procedural consequences of this situation are considerable. The competent authority cannot conduct a robust socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a material omission within the application and a failure to fulfil the evidential requirements set by the Environmental Impact Assessment framework.

Overall, the combination of the non-disclosure of the full Social Impact Assessment and the existing evidence of adverse impacts renders the assessment incomplete and unreliable. This circumstance obstructs a lawful determination and highlights that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of seascape, landscape, and visual impacts is significantly lacking, failing to appropriately capture the scale of change and the sensitivity of the receiving environment. The character of the West Lewis coastline is characterised by its expansive Atlantic horizon, undeveloped nature, and pronounced sense of remoteness. The proposed installation of large-scale turbines close to the shoreline would establish a continuous and overwhelming industrial presence, fundamentally altering this character and leading to a permanent and irreversible change to the landscape.

There is an inadequate representation of the extent of visual change in the application. The size and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This dominance would have a direct negative impact on visual amenity, compromising the essential qualities of naturalness and remoteness. The assessment does not adequately communicate this level of impact or its significance within the context of such a sensitive landscape.

Additionally, there are concerns regarding the methodology used for selecting and presenting visual viewpoints. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and significant landscapes. This raises the possibility that the extent of visual impact has been downplayed, which undermines the reliability of the assessment.

Another critical shortcoming is the lack of consideration for the interconnected relationship between landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape context linked by visual and spatial relationships to the Atlantic horizon. The

assessment treats these cultural assets as separate entities, disregarding their interdependence and resulting in an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these vital relationships, altering the context in which heritage assets are experienced and severing their connection to the natural horizon. This shift represents not just a visual impact but a wider cultural and spatial detriment that has not been sufficiently assessed in the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4 concerning the safeguarding of natural places and historic assets. The magnitude of change is incompatible with the requirements to protect landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the lack of a thorough worst-case scenario assessment further challenges any claims of compliance with policy.

Moreover, it is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be unavoidable and dominant. Therefore, the resulting change is fundamentally permanent, rather than amenable to reduction through mitigation efforts.

In summary, the assessment fails to accurately represent the extent of impact, the sensitivity of the environment, and the interrelated nature of landscape and heritage. These deficiencies hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks the necessary detail to properly assess construction and pollution risks, resulting in an incomplete evaluation of likely environmental effects. It entails significant seabed preparation and installation work in a challenging Atlantic environment, yet fails to provide comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it depends on undefined mitigation and contingency measures that are set to be developed post-consent, which restricts the ability to meaningfully evaluate their effectiveness or adequacy.

This approach raises serious concerns, particularly due to the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental spills of chemicals or oil, it does not adequately address how these incidents will be prevented, controlled, or monitored.

There is considerable uncertainty concerning the scale and behaviour of sediment plumes resulting from seabed disturbances and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of these disturbances. This uncertainty extends to the potential consequences for marine species and habitats that have already been identified as vulnerable within the wider assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent is granted, the application obstructs the evaluation of whether sufficient safeguards are in place to address pollution events. This creates procedural risks and undermines the authority's ability to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the delay in implementing essential environmental safeguards contravenes the Environmental Impact Assessment requirements. It is imperative that likely significant effects and mitigation are evaluated prior to consent; any deficiencies in this information prevent a lawful determination. Furthermore, the application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

Overall, the combination of undefined mitigation measures, insufficient management plans, and uncertainty surrounding potential impacts leads to a materially deficient assessment. These significant shortcomings hinder a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry. However, the assessment provided in the application is inadequate, failing to deliver a thorough evaluation of both ecological and socio-economic impacts. It does not establish that these vital habitats and uses can be safeguarded or sustained without significant disruption.

A critical flaw in the application lies in its assumption that fishing activities can be relocated without adverse consequences. There is no evidence presented that alternative fishing grounds exist, are accessible, or can support additional pressures. This significant omission raises concerns about the potential for overfishing in other areas and the broader economic implications for the local fishing fleet. In the absence of a clear and evidence-based assessment, the implications for fisheries and local livelihoods remain unclear.

Furthermore, the proposal presents considerable risks to marine species, particularly due to the underwater noise generated during construction. The prolonged use of high-energy hammer piling is likely to disturb marine life over extensive distances, notably affecting species such as dolphins. The anticipated disturbance to a considerable portion of the local bottlenose dolphin population warrants serious concern, yet the application downplays these effects without adequate supporting evidence.

There is an evident inconsistency in the application, as it acknowledges the necessity of licences for permitting harm to European Protected Species while simultaneously characterising these impacts as negligible. This contradiction undermines the credibility of the assessment and raises significant questions regarding adherence to the Habitats Regulations, especially given the predicted level of harm that requires legal authorisation.

Moreover, the assessment neglects to address the cumulative impacts stemming from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is essential for determining the overall impact on marine ecosystems and socio-economic conditions.

From a policy perspective, the application fails to demonstrate compliance with the National Planning Framework 4 and the National Marine Plan. It does not adequately show that the development can coexist with existing marine users or prevent unacceptable impacts on marine biodiversity, which hinders any conclusion about the proposal being sustainable development.

In summary, the shortcomings regarding evidence on fishing displacement, the minimisation of acoustic impacts, and the internal inconsistencies contribute to an assessment that is incomplete and unreliable. These deficiencies impede a robust evaluation of impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application suffers from a fundamental lack of completeness in its assessment of onshore infrastructure, failing to address the full scope of impacts associated with what is essentially a singular integrated project. The offshore turbines and onshore works are inherently connected; however, they have been evaluated in isolation, leading to a fragmented understanding that conceals the true magnitude of both environmental and socio-economic consequences.

Onshore components include the installation of cabling across protected moorland and the construction of a substation near Stornoway, alongside access infrastructure that

traverses sensitive landscapes. These activities necessitate excavation through areas of deep peat, especially within Barvas Moor, which is a critical carbon store and ecologically vulnerable habitat. The application lacks a thorough assessment of these impacts, thus obstructing a complete comprehension of the project's overall environmental footprint.

By omitting or postponing the evaluation of onshore impacts, the application hinders a proper analysis of cumulative effects. The Environmental Impact Assessment process mandates that all elements of a project be considered collectively. Nonetheless, the disjointed treatment of offshore and onshore components means that the combined effects on peatlands, ecosystems, and local communities remain inadequately understood.

Moreover, there are considerable risks to delicate habitats, including machair systems and peatland environments that are under policy protection. The application fails to demonstrate that the impacts on these critical habitats have been fully evaluated or that suitable avoidance measures have been implemented, resulting in a significant evidential gap concerning biodiversity protection.

Concerns also arise regarding carbon balance due to potential disturbance of peatlands, which may release stored carbon and engender a carbon debt that contradicts the goals of renewable energy development. The application inadequately addresses this matter or illustrates that the overall carbon balance is favourable.

Additionally, routing infrastructure through active croft land presents possible conflicts with existing land use and legal rights. The application does not furnish evidence that necessary consents or processes have been initiated, calling into question the feasibility and lawful execution of the project.

From a policy standpoint, the inability to assess the project in its entirety and demonstrate the protection of peatlands, habitats, and land use interests contravenes the National Marine Plan and National Planning Framework 4. The failure to show that impacts can be avoided or mitigated further undermines the application.

In summary, the disconnection of project components, the absence of a comprehensive evaluation, and the lack of evidence regarding environmental and land use impacts render this part of the application incomplete and unreliable, impeding a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of evaluation regarding nocturnal wildlife represents a significant gap in the Environmental Impact Assessment. No assessment has been made concerning the impacts of artificial lighting on species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, all of which are highly sensitive to light. These species can experience disorientation due to phototaxis, leading to an increased risk of collision. The application does not provide a lighting impact assessment or a phototaxis study, which means it fails to consider how the proposed aviation lighting could affect these species or potentially increase mortality rates.

Moreover, the assessment relies on daytime survey data, neglecting nocturnal activity and the associated risks. Species like Kittiwakes, which may forage or migrate at night, are similarly vulnerable to the effects of artificial lighting. This oversight creates a critical gap in understanding the ecological impacts that the proposal may have on local wildlife.

The introduction of permanent red aviation lighting is another significant concern. This lighting would be visible over long distances, creating an intrusive "wall of light" across the western horizon, which would fundamentally alter the night-time environment. The assessment does not address how this would impact visual amenity, landscape character, or the experience of residents and visitors, despite the importance of dark skies to the area's identity and its emerging tourism sectors, such as astro-tourism.

From a policy standpoint, these omissions conflict with National Planning Framework 4, which relates to the protection of natural places and environmental quality. The absence of an assessment of dark skies undermines the broader evaluation of landscape and seascape impacts, as the night-time character is an integral part of the environment.

Overall, the failure to assess the impacts on dark skies and nocturnal wildlife constitutes a significant evidential gap. The lack of baseline data, impact modelling, and species-specific analysis leaves the application incomplete and unable to support a lawful determination. Without a thorough assessment, it is impossible to ascertain whether protected species or designated sites would be adversely affected, which engages the precautionary principle and necessitates a more cautious approach.

TOURISM

The assessment of tourism impacts is significantly lacking, failing to consider the economic and social ramifications for a crucial sector of the Isle of Lewis economy. Tourism is heavily reliant on the area's wild coastline, nearly untouched landscapes, dark skies, and the overall sense of remoteness. While the application acknowledges that 86% of visitors are attracted by the scenery, it does not provide a quantified

analysis of how the introduction of large-scale offshore infrastructure could influence visitor numbers, behaviours, or the economic contributions overall.

Tourism has seen notable growth, escalating from £65 million in 2017 to over £81.5 million, which has supported more than 1,000 jobs and accounted for as much as 16% of the island's economy. However, the application neglects to model how the industrialisation of the seascape and the degradation of environmental quality might impact the Tourism Gross Value Added and broader economic resilience. The absence of such analysis prevents an informed determination on whether the development would yield a net economic benefit or harm an established and expanding sector.

Moreover, the assessment does not take into account the crucial role of environmental quality in bolstering tourism, particularly regarding the significance of unspoiled landscapes and dark skies to visitor experience, as well as the potential of emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this inadequacy, leaving a notable void in understanding the impacts on an acknowledged and burgeoning segment of the local economy.

In a context where an island community has limited economic diversification, the disregard for assessing tourism impacts bears broader implications for employment, local businesses, and community sustainability. The lack of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been examined as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application fails to illustrate compliance with National Planning Framework 4, especially regarding economic impact and the necessity to demonstrate net benefit. It also contradicts strategic objectives that recognise tourism as a priority growth sector, and fails to provide adequate evidence for the competent authority to evaluate the economic repercussions of the proposal.

Overall, the failure to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and consider the economic dependencies of the island culminates in a significant evidential gap. This inadequacy obstructs a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. This application echoes the significant issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was

deemed unacceptable. Currently, it is being submitted under a policy framework that emphasizes biodiversity, peatland conservation, landscape integrity, and community wellbeing more strongly.

The application lacks a comprehensive and reliable evidential basis, revealing critical gaps in baseline data, the persistent use of an unspecified design envelope, and an over-reliance on mitigation measures that are not clearly defined. Key impact pathways, such as those concerning nocturnal wildlife, complete onshore infrastructure, and tourism effects, are omitted. Consequently, the Environmental Impact Assessment is insufficient, failing to provide a thorough understanding of likely significant effects or residual impacts.

There are notable procedural shortcomings as well. The absence of a compliant Island Communities Impact Assessment constitutes a breach of statutory obligations under the Islands (Scotland) Act 2018. Moreover, the non-disclosure of the full Social Impact Assessment represents a significant omission. These shortcomings hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

Furthermore, the proposal contradicts the National Planning Framework 4, as it does not demonstrate adequate protection of biodiversity, natural environments, and cultural heritage. It fails to show that health and wellbeing impacts are acceptable, and it cannot substantiate a net economic benefit due to the lack of tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been properly evaluated, clouding the assessment of impacts on peatlands, carbon balance, habitats, and crofting land.

The environmental risks associated with the proposal remain ambiguous and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some respects, inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been satisfied, necessitating the application of the precautionary principle and precluding a lawful conclusion regarding acceptable impacts.

This proposal would lead to considerable and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual relationships, and detrimental impacts on tourism represent enduring effects that cannot be mitigated effectively.

In summary, the application is both procedurally and substantively inadequate for

determination. The significant information deficiencies, coupled with policy conflicts and unresolved environmental risks, obstruct any lawful, evidence-based decision. Therefore, it is requested that consent for the Spiorad na Mara Offshore Wind Farm application be refused entirely.

Additional Comments

Horrified that this proposal has even got this far. A proposed destruction of culture, heritage and habitat than we strongly oppose.

Member of Public 210

Objection To Spiorad na Mara Offshore Wind Farm
References: MD-00011742 & MD-00011743

Dear Sir/Madam

This letter serves as a formal objection to the application for the proposed Spiorad na Mara Offshore Wind Farm, submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. A review of the Environmental Impact Assessment Report and accompanying documents reveals significant deficiencies in planning, environmental considerations, cultural aspects, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise from the scale, proximity, and design of the proposal, particularly regarding its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks an adequate evidential foundation for a lawful determination. There is a notable absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Furthermore, many key components of the proposal remain undefined. The flexible design framework employed hinders a clear understanding of likely significant effects, and the reliance on unspecified mitigation measures means their potential effectiveness cannot be evaluated. Consequently, the documentation fails to provide a comprehensive or informed perspective on environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidentiary support.

There are also clear and substantive conflicts with policy. The proposal appears at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements aimed at safeguarding biodiversity, climate interests, and environmental integrity. These discrepancies directly impact the statutory tests necessary for consent and compromise the ability of the competent authority to determine the development's acceptability in policy terms.

The unprecedented scale of the proposal in this location, with large turbines positioned close to the shoreline, raises serious concerns about landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance indicates that the application is incomplete and unable to support a

lawful determination. In light of these issues, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application for consent fails to fulfil the evidential threshold mandated by the Habitats Regulations, thus failing to exclude adverse effects beyond reasonable scientific doubt. This situation activates the precautionary principle, especially regarding protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, including stipulations related to the protection of biodiversity and environmental integrity. It cannot be established that the impacts have been comprehensively assessed or that appropriate safeguards are in place.

The Environmental Impact Assessment Report suffers from material deficiencies and does not provide a full, transparent, or reliable account of the likely environmental effects of the proposal. The flexible Project Design Envelope employed lacks commitment to specific turbine dimensions, layouts, or configurations, which creates significant uncertainty and obstructs a consistent application of a worst-case scenario. This weakness undermines the integrity of the assessment, meaning that the impacts presented may not accurately reflect the development that will ultimately be constructed. Consequently, both the public and the competent authority are prevented from understanding the true extent of the environmental effects.

Moreover, the application places considerable reliance on mitigation measures, monitoring strategies, and management plans that have not yet been defined. Thus, consent is sought on the premise that environmental harm will be addressed subsequently, obstructing any meaningful evaluation of the effectiveness of such measures or assessment of residual impacts. This deferral of essential information to post-consent stages is procedurally unacceptable and contradicts the purpose of the Environmental Impact Assessment regime, which necessitates that likely significant effects and mitigation measures are clearly established prior to determination.

The report further exhibits significant evidential deficiencies, including gaps in baseline data, limitations in methodology, and an overreliance on assumptions instead of site-specific evidence. Such shortcomings result in uncertainty regarding the scale and significance of impacts, particularly when conclusions of negligible or non-significant effects are presented without robust supporting data. The lack of sufficient information hampers a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory requirements.

In summary, the combination of an undefined design envelope, absence of specified

mitigation measures, and deficiencies in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These inadequacies prevent a lawful and robust assessment of environmental effects, leaving the competent authority unable to make a determination based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The West Lewis coastal environment is a highly sensitive and biologically active marine system, yet the assessment of marine ecology and protected species is materially deficient. It does not deliver a complete or reliable understanding of the ecological receptors in this area. The baseline data remains incomplete, and the methodologies employed fail to adequately capture the presence, behaviour, and habitat use of various species. Consequently, the assessment lacks a solid evidential basis for evaluating the potential impacts.

There is a significant omission concerning otters, which are classified as a European Protected Species. The application does not appropriately acknowledge or assess their active use of coastal regions for foraging and movement. This disregard for their core foraging range and behavioural patterns results in an inadequate assessment of potential effects stemming from construction disturbances, noise, and increased activity. Such shortcomings undermine any conclusions related to the absence of significant effects on this species.

Further issues emerge regarding the assessment of basking sharks, where reliance on aerial surveys creates a substantial detection bias, particularly under Atlantic conditions. This methodology is likely to underestimate their presence, especially when compared to established land-based observations that indicate frequent use of these waters. The failure to adequately incorporate or consider such data contributes to an incomplete baseline and diminishes the reliability of the conclusions presented.

These methodological inadequacies lead to conclusions of negligible or non-significant effects that are founded on assumptions rather than robust evidence. The lack of sufficient baseline data also hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty regarding the actual scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not comply with the Environmental Impact Assessment regime or National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby

necessitating the precautionary principle. Under these circumstances, consent cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These shortcomings obstruct a thorough evaluation of the impacts on marine ecology and protected species, reinforcing the overall conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development on the west coast of the Isle of Lewis poses significant risks to internationally important seabird populations that are already declining. The ornithological assessment associated with this application is fundamentally flawed. It has notable gaps in evidence and internal inconsistencies that seriously undermine its conclusions. The area is known for its key foraging zones and migratory pathways, yet the assessment fails to adequately evaluate the impacts of displacement, collision risk, or habitat loss for these species.

There is a critical contradiction in the application. The developer claims that there will be no significant adverse effects, while also pursuing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that its conclusions are not backed by sufficient evidence.

Furthermore, the assessment does not convincingly show that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will be unaffected. It does not fully consider the importance of these feeding grounds, and its reliance on modelling approaches adds further uncertainty, particularly regarding species in severe decline like Kittiwakes and Fulmars. Methodologies employed appear likely to underestimate mortality rates, especially in situations where baseline data is incomplete and the behavioural responses of the species are not well understood.

The siting of turbines within a known migratory corridor adds another significant risk. This creates a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently analyse the long-term consequences of ongoing mortality in this corridor, nor does it assess the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential requirements needed to affirm no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and limitations in

modelling, indicate that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, making it impossible to lawfully conclude in favour of consent.

Moreover, the identified deficiencies show a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to prove that internationally important seabird populations will not be adversely affected directly conflicts with national policy.

In summary, the assessment is unreliable due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. These issues prevent a thorough evaluation of potential impacts and lead to the overall conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity is insufficient and does not recognise the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply intertwined. The assessment takes a simplistic view, treating heritage as isolated and unchanging assets rather than recognising their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming is the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are active burial sites and places of spiritual significance, but the assessment categorises them as static features, overlooking their continued use and the implications of development on their surroundings. This misrepresentation leads to an incomplete understanding of cultural effects and ignores their importance in community life.

Moreover, the assessment neglects intangible cultural heritage, including the Gaelic language, traditions, and the longstanding bond between the community and the coastal environment. These aspects are essential to the identity of the area but are not addressed, representing a major oversight. Without acknowledging these elements, the cultural impact of the development cannot be fully grasped.

Concerns also arise regarding community rights and participation. The Gaelic-speaking population has a unique cultural identity and is recognised as an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of genuine engagement compromises the validity of the assessment and does not align with established principles of involvement in decisions that affect cultural and environmental interests.

A vital procedural error is the failure to provide a compliant Island Communities Impact Assessment, which is required by the Islands (Scotland) Act 2018. Without this assessment, the responsible authority cannot meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders a lawful determination impossible.

From a policy standpoint, these shortcomings place the proposal at odds with National Planning Framework 4, especially concerning the safeguarding of historic sites and areas. The disregard for both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, constitutes a clear violation of policy requirements.

In summary, the lack of assessment regarding living heritage, intangible cultural value, community rights, and legal obligations creates a substantial evidential gap. The cultural consequences of the development have not been adequately evaluated, and the application does not offer a solid foundation for assessing the true cultural costs of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The non-disclosure of the complete Social Impact Assessment fundamentally undermines the ability of the competent authority to conduct a thorough socio-economic and health evaluation. This lack of transparency is a significant procedural omission within the application, failing to fulfil the evidential requirements of the Environmental Impact Assessment regime.

Residents in the vicinity of the proposed development are already experiencing measurable stress, anxiety, and concern stemming from the scale and proximity of the project. These effects are based on direct engagement with the community and are therefore founded in observable reality rather than speculation. However, the absence of the full report inhibits rigorous scrutiny of the findings and constrains the assessment of their implications within the decision-making framework.

There is a clear indication that the proposal poses a threat to community identity and cohesion, with concerns regarding “cultural loss” identified in the developer's preliminary findings. Despite these assertions, the impacts have not been adequately incorporated into the main application nor afforded the necessary importance in the evaluation process. The withholding of the full Social Impact Assessment obfuscates the genuine human and social costs associated with the development.

Furthermore, the assessment of social impacts, health, and wellbeing is materially deficient and lacks the transparency essential for a lawful evaluation. Summaries that

are available suggest existing adverse effects that have not been fully articulated, raising questions about the application's alignment with National Planning Framework 4 regarding health and wellbeing. Development proposals must enhance positive health outcomes and mitigate harm, yet the evidence presented indicates ongoing detrimental effects that remain unaddressed.

In sum, the failure to disclose the full Social Impact Assessment, in conjunction with documented adverse impacts, renders the evaluation incomplete and unreliable. This prevents a lawful determination and substantiates the assertion that the application does not possess sufficient supporting information to warrant approval.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment presented within the application fails to adequately capture the scale of change and the sensitivity of the West Lewis environment. The coastline is characterised by its open Atlantic horizon, undeveloped landscape, and a pronounced sense of remoteness. The proposed introduction of large-scale turbines near the shoreline would result in a significant industrial presence, leading to a permanent and irreversible alteration of this distinctive character.

Furthermore, the evaluation lacks an accurate representation of the visual impact anticipated from the turbines. Their scale and proximity would dominate views from residential zones, historic sites, and popular coastal areas, thereby negatively affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment does not sufficiently articulate the significance of this impact within the context of such a sensitive landscape.

There are also critical methodological shortcomings in the selection and depiction of visual viewpoints. Evidence indicates that these viewpoints may not adequately reflect the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and valued landscapes. This oversight raises concerns that the visual impact may have been understated, thereby compromising the assessment's overall reliability.

Another notable deficiency is the lack of evaluation regarding the interconnectedness of landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and various Scheduled Monuments exist within a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these heritage assets in isolation, failing to acknowledge their interdependence, which results in an incomplete analysis of the impacts on their settings and cultural significance.

The proposed industrialisation of the seascape would disrupt these connections, altering how heritage assets are perceived and their link to the natural horizon. This goes beyond merely a visual impact, constituting a broader cultural and spatial detriment that has not been properly considered in the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, which emphasises the protection of natural landscapes and historic assets. The extent of the proposed changes is inconsistent with the obligation to preserve landscape character, visual amenity, and the settings of culturally significant sites. The absence of a thorough worst-case assessment further detracts from any assertion of compliance with policy.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and inescapable. Thus, the resulting changes would be fundamental and permanent, not amenable to acceptable levels of reduction through mitigation measures.

In summary, the assessment does not accurately reflect the magnitude of impact, the sensitivity of the environment, or the interrelated nature of landscape and heritage. These significant deficiencies hinder a reliable evaluation and strengthen the conclusion that the proposal is incompatible with the safeguarding of this landscape.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry. However, the application under consideration lacks a thorough assessment of fisheries and marine life, failing to provide a solid evaluation of both ecological and socio-economic impacts. It does not sufficiently demonstrate how these important habitats and activities will be protected or maintained without significant disruption.

A critical concern is the assumption made within the application that fishing activity can be displaced without any adverse consequences. There is no evidence provided to suggest that alternative fishing grounds exist, are accessible, or can handle the additional pressure that would result from such displacement. This significant omission raises concerns about the potential for overfishing in other areas, which could lead to broader economic repercussions for the local fishing fleet. Without a clear and evidence-backed assessment, understanding the impacts on fisheries and local livelihoods remains impossible.

Moreover, the proposal introduces serious risks to marine species, particularly due to the underwater noise generated during construction. The high-energy hammer piling

anticipated to occur over an extended period is expected to cause disturbances across considerable distances, affecting species such as dolphins. The projected disturbance to a significant portion of the local bottlenose dolphin population is alarming; yet, the application tends to minimize the importance of these effects without providing adequate evidence.

There are also inconsistencies within the application itself. While it acknowledges the necessity for licences to permit harm to European Protected Species, it simultaneously describes the expected impacts as negligible. This contradiction undermines the credibility of the assessment and raises serious questions about compliance with the Habitats Regulations, especially when potential harm is significant enough to necessitate legal authorisation.

Furthermore, the assessment neglects to consider cumulative impacts resulting from various pressures such as habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, determining the overall impact on marine ecosystems and socio-economic conditions is unfeasible.

From a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not show that the proposed development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, making it impossible to conclude that the proposal supports sustainable development.

In summary, the absence of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the assessment collectively render it incomplete and unreliable. These shortcomings hinder a comprehensive evaluation of impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal consists of offshore turbines and various onshore works, which are integral to the project. However, the assessment of the onshore infrastructure is materially incomplete, as it fails to account for the full extent of impacts associated with this single integrated project. The separation of the offshore and onshore elements leads to a fragmented evaluation, obscuring the true scale of the environmental and socio-economic effects involved.

Onshore works entail cabling through protected moorland, the construction of a substation near Stornoway, and access infrastructure across sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and an ecologically sensitive habitat.

The application does not offer a comprehensive assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By excluding or deferring the assessment of onshore impacts, the application fails to provide a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project are considered collectively. However, the distinction between offshore and onshore elements means the cumulative impacts on peatlands, habitats, and communities are not fully understood.

There are also significant risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application does not demonstrate that the impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been implemented. This situation represents a clear evidential gap concerning biodiversity protection.

The proposal raises additional concerns regarding carbon balance. The disturbance of peatland releases stored carbon, which may result in a carbon debt, contradicting the objectives of renewable energy development. The application fails to adequately address this matter or show that the overall carbon balance remains beneficial.

Furthermore, routing infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. The application lacks evidence that the necessary consents or processes have been initiated, raising questions about deliverability and lawful implementation.

From a policy standpoint, the failure to evaluate the project as a whole and to demonstrate the protection of peatlands, habitats, and land use interests conflicts with the National Marine Plan and National Planning Framework 4. The inability to prove that impacts can be avoided or mitigated further undermines the application.

In conclusion, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence concerning environmental and land use impacts render this part of the application incomplete and unreliable, preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is notable for its exceptionally dark skies, which play a vital role in defining the area's environmental quality, cultural identity, and tourism potential. The proposal introduces permanent red aviation lighting that is visible over long distances, which creates a continuous and intrusive “wall of light” effect across the

western horizon. This alteration fundamentally impacts the night-time environment.

There is a significant absence of assessment regarding the effects of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. Given the importance of dark skies to the area's identity, as well as to the emerging sector of astro-tourism, this omission is particularly concerning. The overall landscape and environmental assessment lacks consideration of these impacts, creating a noticeable gap.

Moreover, there is no evaluation of the potential impacts on nocturnal wildlife. Species like the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are especially sensitive to artificial lighting due to phototaxis, a condition that can lead to disorientation and an increased risk of collision. The application fails to include any lighting impact assessment or phototaxis study, leaving unassessed how aviation lighting may impact these species and potentially increase mortality rates.

The reliance on daytime survey data in the ornithological assessment exacerbates this issue, as it does not account for nocturnal activity or the associated risks. Vulnerable species such as Kittiwakes, which may forage or migrate at night, face disorientation from artificial lighting, yet this risk has not been evaluated. The lack of site-specific night-time data results in a critical shortfall in understanding ecological impacts.

Without a proper assessment of nocturnal impacts, it remains impossible to ascertain whether protected species or designated sites could be adversely affected. The necessary evidential standard, which would rule out adverse effects beyond reasonable scientific doubt, cannot be achieved, thus invoking the precautionary principle and obstructing a lawful determination.

From a policy perspective, these omissions conflict with National Planning Framework 4 regarding the protection of natural environments and the quality of ecosystems. This lack of consideration undermines the broader evaluation of landscape and seascape impacts, as the character of the night-time environment is an integral aspect of the overall ecological context.

In summary, the absence of any evaluation of dark skies and nocturnal wildlife creates a substantial evidential gap. The deficiencies in baseline data, impact modelling, and species-specific analysis render the application incomplete and incapable of supporting a lawful determination.

TOURISM

The application presents a significant deficiency in its assessment of tourism impacts, neglecting to evaluate the economic and social consequences for a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. Although the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or overall economic contribution.

Tourism on the Isle of Lewis has experienced considerable growth, with its value rising from £65 million in 2017 to over £81.5 million. This sector supports more than 1,000 jobs and constitutes up to 16% of the island's economy. However, the application does not model the potential impacts of seascape industrialisation and the loss of environmental quality on Tourism Gross Value Added or broader economic resilience. This lack of analysis raises questions about whether the development could deliver a net economic benefit or instead undermine an established and flourishing sector.

Furthermore, the assessment does not take into account the role of environmental quality in promoting tourism. The importance of unspoiled landscapes and dark skies for visitor experiences, alongside emerging markets such as nature-based tourism and astro-tourism, is overlooked. The absence of a Dark Skies Assessment further accentuates this shortcoming, creating a significant gap in understanding the impacts on a recognised and expanding component of the local economy.

In an island community characterised by limited economic diversification, the failure to assess tourism impacts carries broader implications for employment, local businesses, and community sustainability. The lack of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been evaluated as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, especially regarding economic impact and the requisite to exhibit net benefit. It also conflicts with strategic objectives that prioritise tourism as a growth sector, providing insufficient evidence for the competent authority to assess the economic consequences of the proposal.

Overall, the combination of inadequate quantification of tourism impacts, the failure to assess environmental factors influencing visitor behaviour, and a disregard for the island's economic dependency culminates in a significant evidential gap. This deficiency obstructs a thorough evaluation of economic effects and supports the conclusion that the application remains incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates a significant failure to meet the standards for sustainable development as required by statutory duties, national policy, and evidential standards. It revisits the fundamental issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the degree of industrialisation was deemed unacceptable. This current application is presented under a policy framework that places a stronger emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

Critical gaps exist in the evidential basis for this application. There is incomplete baseline data, an undefined design envelope, unspecified reliance on mitigation measures, and key impact pathways such as nocturnal wildlife, full onshore infrastructure, and tourism effects are omitted. The Environmental Impact Assessment is therefore inadequate, lacking the information necessary for a comprehensive understanding of significant effects or residual impacts.

Additionally, there are clear procedural issues. The failure to conduct a compliant Island Communities Impact Assessment breaches statutory duty under the Islands (Scotland) Act 2018, and the lack of a full Social Impact Assessment is a material omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal is also at odds with National Planning Framework 4. It does not demonstrate adequate protection of biodiversity, natural places, and cultural heritage, fails to show that health and wellbeing impacts are acceptable, and cannot provide evidence of a net economic benefit due to the lack of tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been properly evaluated, masking their impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain unclear and may be significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been reached, invoking the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

This proposal would lead to considerable and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies,

the disruption of cultural and visual relationships, and the impacts on tourism are permanent effects that cannot be adequately mitigated.

In summary, the application is procedurally and substantively inadequate for determination. The scale of information deficiencies, coupled with policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. Therefore, the competent authority must either refuse consent for the application or use the appropriate regulatory provisions to request the submission of the missing information.

A formal request is thus made for the complete refusal of the application for the Spiorad na Mara Offshore Wind Farm.

Member of Public 211

Objection To Spiorad na Mara Offshore Wind Farm
References: MD-00011742 & MD-00011743

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. A thorough examination of the Environmental Impact Assessment Report and its accompanying documentation reveals significant deficiencies in planning, environmental considerations, cultural factors, and procedural aspects. The proposed development is situated off the west coast of the Isle of Lewis, an area notable for its Atlantic-facing coastline, near-pristine environment, and strong cultural heritage. Concerns arise regarding the scale, proximity, and design of the project, questioning its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential foundation for lawful determination. Essential environmental data is absent, baseline information is inconsistent and limited, and critical elements of the proposal remain unspecified. The flexible design framework used prevents a comprehensive understanding of potential significant effects, and the reliance on yet-to-be-defined mitigation measures raises doubts about their effectiveness. Consequently, the documentation fails to provide a complete or informed perspective on environmental, cultural, or community impacts, undermining claims of negligible or non-significant effects which are not backed by robust evidence.

There are evident and substantive conflicts with policy. The proposal does not appear to align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These inconsistencies directly relate to the statutory tests necessary for consent and compromise the capacity of the competent authority to affirm the proposal's acceptability in policy terms.

The unprecedented scale of the proposal introduces substantial concerns, especially with large turbines positioned near the shoreline, impacting landscape capacity, visual dominance, and overall environmental consequences. Collectively, the lack of adequate information, dependence on undefined mitigation measures, evidential shortcomings, and clear conflicts with policy indicate that the application is incomplete

and cannot support a lawful determination. In light of these issues, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary robustness and fails to deliver a full, transparent, or reliable analysis of the potential environmental effects of the proposed development. A flexible Project Design Envelope is employed, which does not commit to specific turbine dimensions, layouts, or configurations. This approach introduces substantial uncertainty and inhibits a consistent application of a worst-case scenario, ultimately undermining the integrity of the assessment. As a result, the impacts reported may not accurately reflect the actual development, hindering both public understanding and the competent authority's ability to gauge the true extent of environmental consequences.

Consent for the application is sought based on mitigation measures, monitoring strategies, and management plans that are not yet defined. This reliance on unspecified strategies means that any environmental harm is to be addressed at a later stage, thus preventing a meaningful evaluation of their effectiveness or a proper assessment of residual impacts. This deferral of critical information to post-consent stages is procedurally unacceptable and directly contradicts the aims of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be clearly established prior to any determination.

Moreover, there are significant evidential shortcomings, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the scale and significance of the impacts, particularly where conclusions of negligible or non-significant effects are presented without adequate supporting data. The lack of sufficient information inhibits a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot align with statutory requirements.

Consequently, the application does not meet the evidential threshold required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. The precautionary principle is engaged, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, failing to ensure that impacts have been comprehensively assessed or that appropriate safeguards are implemented.

In summary, the combination of an undefined design envelope, the absence of specified mitigation measures, and significant gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These

deficiencies obstruct a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make a determination based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species associated with this application is significantly lacking, failing to offer a complete and trustworthy understanding of the ecological receptors within the West Lewis coastal area. This marine environment is both highly sensitive and biologically active, yet the baseline data presented is incomplete. The methodologies employed do not sufficiently capture the presence, behaviour, and habitat utilisation of various species, which compromises the ability to assess potential impacts reliably.

Particularly concerning is the omission regarding otters, classified as a European Protected Species. The application inadequately acknowledges their active use of the coastal regions for foraging and movement, neglecting to consider their core foraging range and behavioural patterns. Consequently, the potential impacts stemming from construction-related disturbances, noise, and increased human activity have not been thoroughly assessed, undermining claims of no significant effects on this species.

Moreover, the assessment of basking sharks suffers from deficiencies, as it relies heavily on aerial surveys, which introduce substantial detection bias, especially in Atlantic conditions. This method is likely to underestimate the presence of these sharks, especially when compared to established land-based observations that indicate they frequently utilise these waters. The oversight of relevant data leaves the baseline incomplete and further weakens the credibility of the conclusions drawn.

These methodological shortcomings mean that assertions of negligible or non-significant effects rest on unsubstantiated assumptions rather than sound evidence. Additionally, the lack of comprehensive baseline data hampers meaningful evaluations of cumulative and indirect impacts, failing to account for seasonal variations and broader ecosystem interactions. This situation results in uncertainty regarding the actual risks faced by marine species and habitats.

Regulatory obligations are also not met, as the application does not adequately identify or assess protected species, failing to satisfy the standards set by the Environmental Impact Assessment regime and National Planning Framework 4. The uncertainty created prevents the assurance of no adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these conditions, lawful consent cannot be granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions leads to an unreliable assessment. These issues hinder a thorough evaluation of impacts on marine ecology and protected species, culminating in the assertion that the application lacks a robust evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed and lacks the rigorous evidence needed to support its conclusions. It overlooks the critical fact that the west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already declining. The application fails to provide adequate assurance that these species will not be adversely affected, particularly given that the development is situated within vital foraging areas and migratory pathways. The assessment does not thoroughly consider the risks of displacement, collision, or habitat loss that may arise from the project.

Moreover, there is a glaring contradiction in the application, as the developer asserts that no significant adverse effects will occur while also presenting a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency undermines the credibility of the assessment and raises doubts about the validity of its findings. The evidence presented does not convincingly demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The critical feeding grounds for these birds are not adequately evaluated, and the reliance on modelling raises significant uncertainty, particularly for species like Kittiwakes and Fulmars that are in severe decline. The methodologies used are likely to underestimate mortality rates, especially where baseline data is lacking and the behavioural responses of the species are not fully understood.

The placement of turbines within a recognised migratory corridor presents an additional risk by creating a barrier along a primary flight path for species migrating between the United Kingdom and Iceland. The application does not sufficiently examine the long-term consequences of sustained mortality within this corridor or the potential impact on species with limited global populations. From a regulatory standpoint, the application does not meet the necessary evidential standards to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, data gaps, and limitations in modelling all contribute to a failure to achieve the standard of beyond reasonable scientific doubt. This situation engages the precautionary principle and undermines the legal basis for granting consent.

In addition, the identified deficiencies demonstrate non-compliance with the National

Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to show that internationally important seabird populations will not suffer adverse effects places this proposal in direct opposition to national policy. Collectively, these issues render the assessment unreliable due to its internal inconsistencies, methodological flaws, and insufficient evidence. Such shortcomings impede a thorough evaluation of potential impacts, leading to the conclusion that the application does not fulfil the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment neglects the West Lewis coastline's identity as a vibrant cultural landscape where environment, language, tradition, and community intertwine. By adopting a simplistic perspective that treats heritage merely as isolated features, the application overlooks the living, social, cultural, and spiritual roles these elements play within the community.

Particularly concerning is the treatment of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas. These cemeteries serve as active sites of burial and spiritual practice, yet they are misclassified as static features in the assessment. This failure to acknowledge their ongoing use and significance, along with the potential impact of development on their surroundings, results in a superficial evaluation of cultural effects and ignores their importance in community life.

Moreover, the assessment fails to consider intangible cultural heritage such as the Gaelic language, local traditions, and the community's enduring connection to the coastal environment. These elements are essential to the area's identity but are completely absent from the analysis, leading to a serious oversight. Without this consideration, it is impossible to fully grasp the cultural implications of the proposed development.

There are also pressing concerns regarding the rights and engagement of the community. The Gaelic-speaking population possesses a unique cultural identity recognised as characteristic of Indigenous Peoples. However, the process of Free, Prior and Informed Consent has not been carried out. This lack of meaningful engagement raises questions about the validity of the assessment and fails to adhere to established participation principles concerning decisions that affect cultural and environmental interests.

Additionally, a significant procedural shortcoming is the absence of a compliant Island Communities Impact Assessment, mandated under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot meet its legal obligation to review the social, cultural, and economic impacts on the island community, making the

determination unlawful.

From a policy standpoint, these shortcomings place the proposal at odds with National Planning Framework 4, particularly concerning the protection of historic assets and spaces. The neglect to consider both tangible and intangible heritage, as well as the failure to recognise ongoing cultural practices, represents a clear breach of policy requirements.

The cumulative effect of failing to assess living heritage, intangible cultural values, community rights, and statutory obligations creates a substantial evidential gap. As it stands, the cultural impacts of the development have not been adequately evaluated, leaving the application lacking a sufficient basis to assess the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency regarding the Social Impact Assessment is a critical concern that affects the community's ability to understand the potential consequences of the proposed development. Although the developer conducted a Social Impact Assessment, including discussions with local residents, the comprehensive report has not been made publicly available. This absence creates a substantial evidential gap, hindering both public insight and the competent authority's assessment of the social risks highlighted by the developer's own research.

Residents are reportedly experiencing significant stress, anxiety, and worry due to the scale and proximity of the proposal. These impacts are directly informed by local engagement and should not be dismissed as mere speculation. However, the failure to release the full report restricts thorough examination of these findings and limits the capacity to evaluate their importance in the decision-making process.

Furthermore, the proposal is perceived to pose a direct threat to the community's identity and cohesion, with "cultural loss" noted in the findings submitted by the developer. Nevertheless, these critical impacts have not been adequately addressed within the main application, nor have they been given the consideration they merit. By withholding the complete Social Impact Assessment, the developer obscures the genuine human and social costs of the development.

This lack of disclosure undermines the Environmental Impact Assessment process, as a thorough understanding of social, economic, and health impacts is vital for developments of this magnitude, especially when they may affect community character and functioning. The application falls short of providing a complete evidential foundation for weighing the benefits against the potential harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly concerning health and wellbeing. Developments are expected to promote positive health outcomes and mitigate harm, yet the evidence currently available suggests the presence of adverse effects that have not been fully revealed. Without the full assessment, it is impossible to confirm compliance with these policy requirements.

The procedural ramifications of these issues are considerable. The competent authority is unable to conduct a robust evaluation of socio-economic and health impacts without access to the complete Social Impact Assessment, which represents a significant oversight within the application and a failure to satisfy the evidential criteria of the Environmental Impact Assessment framework.

In conclusion, the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing negative impacts, leads to an incomplete and unreliable assessment. This situation inhibits a lawful determination and further supports the view that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of visual impacts and the seascape and landscape effects of the proposed development is fundamentally flawed and does not adequately account for the extent of change or the vulnerability of the environment it will affect. The coastline of West Lewis is characterised by an unspoilt Atlantic horizon, a natural setting, and a pronounced sense of seclusion. The introduction of large turbines in close proximity to the coast would create a persistent and overwhelming industrial presence, which would fundamentally change this character and lead to a permanent and irreversible alteration of the landscape.

The application does not sufficiently capture the extent of the visual change that would occur. Due to their scale and proximity, the turbines would dominate views from residential areas, historic locations, and popular coastal spots, directly impacting visual amenity and undermining the qualities that define the area’s naturalness and seclusion. The assessment fails to adequately represent the significance of this impact within the context of such a sensitive landscape.

Methodological issues arise concerning the choice and depiction of visual viewpoints. Evidence indicates that the selected viewpoints may not accurately represent the most sensitive receptors or the worst-case scenarios, especially regarding significant cultural heritage sites and valuable landscapes. This oversight risks underestimating the visual impacts, compromising the assessment's reliability.

Furthermore, the assessment neglects to evaluate the interconnectedness between the landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are intrinsically linked to their wider landscape setting, connected visually and spatially to the Atlantic horizon. By treating these assets as standalone entities, the assessment fails to acknowledge their interdependence, resulting in an incomplete assessment of impacts on their cultural significance and setting.

The industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are experienced and severing their ties to the natural horizon. This situation represents not just a visual issue but a broader cultural and spatial detriment that has not been adequately examined in the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, particularly regarding the safeguarding of natural environments and historical assets. The magnitude of the anticipated changes is incompatible with the need to protect landscape character, visual amenity, and the contexts of culturally significant sites. Additionally, the lack of a comprehensive worst-case assessment further weakens any argument for policy compliance.

It is evident that the impacts noted cannot be effectively mitigated. Given the size, height, and proximity of the turbines, their visual presence would be dominant and unavoidable. The changes wrought would be fundamental and permanent, rather than amenable to reduction through mitigation efforts.

In summary, the assessment fails to accurately depict the scale of the impacts, the sensitivity of the receiving environment, and the interconnectedness of the landscape and heritage. These shortcomings result in an unreliable evaluation and reinforce the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment presented regarding construction and pollution risks lacks the necessary detail for a thorough evaluation of likely environmental effects. The project entails considerable seabed preparation and installation activities within a high-energy Atlantic environment, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that would only be formulated after consent is granted, thereby hindering any substantial assessment of their adequacy or effectiveness.

This dependence on unspecified future measures raises significant concerns due to the sensitivity of the affected environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. Although the application recognises risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it falls short in detailing how these risks will be prevented, controlled, or monitored.

There is also ambiguity concerning the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. The lack of robust modelling and clearly outlined management strategies makes it impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty is applicable to potential effects on marine species and habitats that have already been recognised as sensitive in the broader assessment.

Moreover, the deficiency of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application obstructs the ability to evaluate whether adequate safeguards are established to respond to pollution incidents. This introduces procedural risks and undermines the competent authority's capacity to assess environmental protection measures at the decision-making stage.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the Environmental Impact Assessment regime's requirements. Significant effects and mitigation measures must be evaluated before consent is granted, and in the absence of such information, a lawful determination cannot be achieved. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the lack of clearly defined mitigation measures, insufficient management plans, and uncertainty regarding potential impacts result in an assessment that is materially deficient. These issues obstruct a comprehensive evaluation of construction and pollution risks and further reinforce the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment regarding fisheries and marine life lacks detail and does not adequately evaluate ecological or socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing industry, but the application fails to show how these habitats and uses will be protected or maintained without significant disruption.

A key problem is the assumption that fishing activity can be moved without consequences. There is no evidence provided that alternative fishing grounds exist, are accessible, or can handle additional pressure. This is important, as displacement could lead to overfishing in other areas and could negatively affect the local fishing fleet's economy. The lack of a clear, evidence-based assessment means that the potential impacts on fisheries and local livelihoods remain unclear.

Furthermore, the proposal poses significant risks to marine species, particularly due to noise generated during construction. The use of high-energy hammer piling for extended periods is expected to cause disturbance over large areas, which could impact species such as dolphins. The anticipated disturbance to a large part of the local bottlenose dolphin population raises serious concerns, yet the application downplays these effects without enough supporting evidence.

There is also a clear contradiction within the application. While it acknowledges that licenses are needed to permit harm to European Protected Species, it simultaneously claims that the impacts are negligible. This inconsistency damages the credibility of the assessment and raises issues about compliance with the Habitats Regulations, especially where harm is expected to require legal authorisation.

Additionally, the assessment does not take into account cumulative impacts from various pressures like habitat disturbance, noise, and fishing activity displacement. Without a thorough evaluation of these combined effects, it is impossible to assess the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not prove adherence to the National Planning Framework 4 or the National Marine Plan. It fails to demonstrate that the development can coexist with current marine users or avoid unacceptable effects on marine biodiversity, which hinders any conclusion that the proposal constitutes sustainable development.

Overall, the shortcomings in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions render the assessment incomplete and unreliable. These issues obstruct a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the project as a whole is fundamentally flawed, as it fails to provide a complete evaluation of the impacts associated with what constitutes a single integrated endeavour. The distinct treatment of offshore turbines and onshore works results in a fragmented analysis that obscures the true scope of the environmental and socio-

economic consequences.

The onshore infrastructure comprises various elements, including cabling across protected moorland, the construction of a substation in proximity to Stornoway, and the development of access routes through delicate landscapes. Notably, these activities involve excavation in areas of deep peat, especially within Barvas Moor, which is recognised as both an ecologically sensitive habitat and a critical carbon store. The application does not offer a thorough assessment of these impacts, thereby hindering a comprehensive understanding of the project's overall environmental footprint.

Furthermore, the separation of assessments for offshore and onshore components leads to a failure to evaluate cumulative effects adequately. The Environmental Impact Assessment process mandates that all parts of a project be examined collectively. However, the disjointed assessment obscures the combined effects on peatlands, habitats, and local communities, leaving significant risks unaddressed.

There are substantial threats to sensitive habitats, including machair systems and peatland environments, which hold policy protection. The application lacks sufficient evidence that impacts on these habitats have been fully evaluated or that effective avoidance measures have been implemented, which raises a clear evidential gap in terms of biodiversity protection.

Concerns are also raised regarding the project's carbon balance. Disturbance of peatland areas can release stored carbon, leading to a potential carbon debt that contradicts the aims of renewable energy initiatives. The application fails to tackle this issue adequately or to demonstrate that the overall carbon balance remains advantageous.

Moreover, the routing of the infrastructure through active croft land introduces risks of conflict with existing land uses and legal entitlements. There is no evidence provided that the necessary consents or processes have been initiated, which raises concerns about the project's deliverability and lawful execution.

From a policy standpoint, the failure to assess the project comprehensively and demonstrate protection for peatlands, habitats, and land use interests is in conflict with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further weakens the application.

In summary, the separation of the project's components, the lack of a comprehensive impact assessment, and insufficient evidence concerning environmental and land use

implications collectively render this aspect of the application incomplete and unreliable, thus obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife is a serious oversight in the Environmental Impact Assessment. The West Lewis coastline is distinguished by its exceptionally dark skies, which play a crucial role in the region's environmental quality, cultural identity, and tourism potential. The proposed installation of permanent red aviation lighting, which would be visible over extensive distances, threatens to create a continuous and intrusive “wall of light” across the western horizon, thereby fundamentally altering the night-time environment.

The application fails to evaluate the effects of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This lack of consideration is particularly troubling given the significance of dark skies to the area's identity and to emerging tourism sectors, including astro-tourism. Such omissions result in a notable gap in the overall landscape and environmental assessment.

Furthermore, there is no evaluation of potential impacts on nocturnal wildlife. Species like the Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are notably sensitive to artificial lighting due to phototaxis, which can cause disorientation and increase the risk of collisions. The application does not include any assessment of lighting impacts or phototaxis studies, failing to address how the proposed aviation lighting might affect these species or contribute to increased mortality rates.

This issue is exacerbated by the dependence on daytime survey data in the ornithological assessment, which overlooks nocturnal activities and associated risks. For example, Kittiwakes may forage or migrate at night and are susceptible to disorientation from artificial lighting, yet this risk has not been evaluated. The lack of site-specific night-time data creates a significant gap in understanding ecological impacts.

Without a thorough assessment of nocturnal effects, it is impossible to ascertain whether protected species or designated sites may be adversely impacted. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and preventing a lawful determination.

From a policy standpoint, the omission contradicts National Planning Framework 4 concerning the protection of natural places and environmental quality. Additionally, it undermines a comprehensive evaluation of landscape and seascape impacts, as the

character of night-time environments is integral to the overall ecological setting.

In summary, the failure to assess dark skies and nocturnal wildlife results in a significant evidential gap. The absence of baseline data, impact modelling, and species-specific analysis renders the application incomplete and unsuitable for lawful determination.

TOURISM

The application presents a materially deficient assessment of tourism impacts, overlooking the economic and social ramifications for a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the region's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness. Despite acknowledging that 86% of visitors are attracted by scenery, it fails to provide a quantified evaluation of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or overall economic contributions.

Tourism has experienced substantial growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. Nevertheless, the application does not analyse how the industrialisation of the seascape and the degradation of environmental quality could impact Tourism Gross Value Added or the broader economic resilience of the area. Without this analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or jeopardise an established and expanding sector.

Furthermore, the assessment neglects to examine the significance of environmental quality in fostering tourism, including the necessity of unspoiled landscapes and dark skies for enhancing visitor experiences, as well as the growing markets of nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a significant gap in the understanding of impacts on a recognised and burgeoning segment of the local economy.

In the context of an island community characterised by limited economic diversification, the failure to evaluate tourism impacts holds broader consequences for employment, local businesses, and community sustainability. The omission of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been assessed as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, especially concerning economic impact and the requirement to show net benefit. It also contradicts strategic objectives that prioritise

tourism as a growth sector, lacking sufficient evidence for the competent authority to evaluate the economic repercussions of the proposal.

Ultimately, the inability to quantify tourism impacts, assess environmental factors influencing visitor behaviour, and consider the island's economic dependency culminates in a significant evidential gap. This hampers a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the standards of sustainable development as required by statutory duties, national policy, and evidential standards. This application echoes the core concerns that led to the refusal of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the scale of industrialisation. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application does not adequately address these critical areas.

A significant concern is the incomplete and unreliable evidential basis for determination. There are notable gaps in baseline data and an undefined design envelope is employed, alongside unspecified reliance on mitigation measures. Key impact pathways, including nocturnal wildlife, onshore infrastructure, and tourism effects, have been omitted from the assessment. Consequently, the Environmental Impact Assessment is insufficient, hindering a comprehensive understanding of the likely significant effects and residual impacts.

Procedural failures are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory duties under the Islands (Scotland) Act 2018, while the failure to disclose a full Social Impact Assessment is a material omission. These gaps impede the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

Moreover, the proposal conflicts directly with National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural places, and cultural heritage. The health and wellbeing impacts have not been shown to be acceptable, and the absence of tourism impact modelling prevents evidence of any net economic benefit. Additionally, the cumulative impacts of both offshore and onshore components have not been properly assessed, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some areas, inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been met, invoking the precautionary principle and preventing a lawful determination of acceptable impacts.

Furthermore, the proposal would lead to substantial and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, loss of dark skies, disruption of cultural and visual relationships, and negative impacts on tourism represent permanent changes that cannot be mitigated effectively.

Overall, the application is procedurally and substantively unfit for determination. The scale of deficiencies in information, combined with policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority is urged to refuse consent on these grounds or to invoke regulatory provisions requiring the submission of the missing information.

A formal request is made for the complete refusal of the application for the Spiorad na Mara Offshore Wind Farm.

Additional Comments

Another piece of Scotland under threat from these hideous Chinese monsters. Our own area is already at saturation point, we are supposed to be custodians of our countryside leaving it as nature intended for future generations. Why are we still pursuing this so called GREEN AGENDA when there is little or no infrastructure to ship this power to where it is needed? Put them on top of Arthurs Seat where the power is needed. These things cannot be allowed to be built. No more.

Member of Public 212

Objection To Spiorad na Mara Offshore Wind Farm
References: MD-00011742 & MD-00011743

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted within the frameworks of marine licensing and Environmental Impact Assessment. The objection arises from an examination of the Environmental Impact Assessment Report alongside supporting documents, revealing significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. Located off the west side of the Isle of Lewis, an area characterised by its Atlantic coastline, relatively unspoilt environment, and rich cultural heritage, the proposed development's scale, design, and proximity raise serious questions about its alignment with statutory obligations, national policy, and sustainable development principles.

The application lacks a sufficient evidential foundation necessary for a lawful determination. It is marked by missing critical environmental data, limited and inconsistent baseline information, and undefined aspects of the proposal. The flexible design framework used does not allow for a clear comprehension of the potential significant effects, while the unspecified mitigation measures hinder the assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the impacts on the environment, culture, and community, with claims of negligible effects lacking robust support.

Moreover, there are evident and significant conflicts with policy. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health. It does not sufficiently demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. These discrepancies directly affect the statutory tests required for consent and compromise the competent authority's capacity to deem the development acceptable from a policy standpoint.

The unprecedented scale of this proposal, featuring large turbines situated near the shoreline, raises major concerns about the capacity of the landscape, visual impact, and environmental repercussions. Collectively, the lack of adequate information, dependence on undefined mitigation strategies, evidential gaps, and clear policy inconsistencies illustrate that the application is incomplete and does not support a

lawful determination. In light of these factors, it is essential that the precautionary principle is invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed, lacking a complete and transparent account of the anticipated environmental consequences of the proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific turbine sizes, layouts, or configurations, creates considerable uncertainty. This variability undermines the integrity of the assessment and means that the impacts outlined may not accurately reflect the final development. Consequently, both the public and the competent authority are left without a clear understanding of the actual environmental effects.

The application heavily depends on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent on the premise that environmental harm will be managed later impedes any substantial evaluation of effectiveness or assessment of residual impacts. This postponement of critical information until after consent is granted is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation measures be clearly established before a decision is made.

Significant evidential gaps persist, including deficiencies in baseline data, methodological limitations, and reliance on assumptions rather than site-specific evidence. These issues generate uncertainty about the magnitude and significance of impacts, especially where conclusions regarding negligible or non-significant effects lack robust supporting data. The failure to provide adequate information hinders a proper understanding of cumulative and worst-case impacts and introduces scientific uncertainty that does not align with statutory obligations.

As a result, the application does not fulfil the evidential requirements set by the Habitats Regulations, which necessitate the exclusion of adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, especially in relation to biodiversity protection and environmental integrity, as it cannot be shown that impacts have been thoroughly assessed or that suitable safeguards are established.

Overall, the reliance on an undefined design envelope, the lack of specified mitigation, and the inadequacies in baseline data collectively render the Environmental Impact

Assessment Report unreliable and incomplete. These shortcomings preclude a lawful and rigorous assessment of environmental effects, leaving the competent authority unable to make an informed determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application fails to provide a comprehensive assessment of alternatives, which is crucial for compliance with the Environmental Impact Assessment regime. Instead of offering a systematic and reasoned comparison of viable alternatives grounded in environmental considerations, it presents a narrative about the project's development. This approach does not adequately demonstrate that less harmful options have been thoroughly identified, evaluated, and preferred over more detrimental solutions.

There is a lack of transparent, evidence-based comparisons concerning alternative offshore locations, development scales, or design configurations. Notably, the developer has not convincingly explored the possibility of positioning turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be mitigated. The West Lewis coastline is particularly sensitive, and the pivotal role of proximity to shore in assessing impact means that the failure to include such analysis undermines the conclusion that the proposed siting is the least damaging option available.

Furthermore, deficiencies extend to the assessment of cable routing and landfall, where insufficient evidence exists to show that alternative routes have been adequately considered to avoid or minimise impacts on sensitive receptors. This includes significant cultural and spiritual sites, such as Barvas Cemetery. The lack of a clear avoidance strategy, combined with an absence of comparative analysis, indicates that the principle of mitigation by design has not been employed, leading to an overreliance on post-design mitigation measures.

Consequently, the application does not show that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This failure to adhere to the established mitigation hierarchy inhibits the competent authority's ability to ascertain whether more suitable and less harmful alternatives could exist. The absence of a robust alternatives assessment also raises questions about the sustainability and policy compliance of the proposal.

From a policy standpoint, these deficiencies compromise adherence to National Planning Framework 4, particularly regarding the protection of natural environments, cultural heritage, and community well-being. The omission of a structured and comparative assessment is a significant shortfall that leads to the conclusion that the

application has not been sufficiently examined and cannot warrant a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment related to marine ecology and protected species is lacking and does not give a complete or trustworthy understanding of the ecological receptors in the West Lewis coastal environment. This area is highly sensitive and biologically active, yet the baseline data presented is insufficient, and the methods used do not effectively capture species presence, behaviour, and habitat usage. Consequently, the assessment fails to provide a solid evidential basis for assessing impacts.

A major gap involves otters, which are a European Protected Species. The application does not adequately recognise or evaluate their use of coastal regions for foraging and movement. Without considering their core foraging areas and behaviours, the potential effects from construction disturbances, noise, and increased activity have not been properly examined. This oversight undermines any conclusions drawn about the lack of significant effects on otters.

Additionally, there are further shortcomings in the assessment of basking sharks. The reliance on aerial surveys brings significant detection bias, particularly in Atlantic conditions, likely leading to an underestimation of their presence. This is particularly evident when compared to established land-based observations that show these waters are used frequently. Neglecting to include or properly consider this data results in an incomplete baseline, diminishing the reliability of the conclusions drawn.

These methodological flaws mean that claims of negligible or non-significant effects are based on assumptions instead of solid evidence. Furthermore, the lack of sufficient baseline data hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This introduces uncertainty regarding the actual risks to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime and the National Planning Framework 4, as it has not properly identified or assessed protected species. The level of uncertainty brought about by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the precautionary principle. Given these circumstances, consent cannot be lawfully granted.

In summary, the incomplete baseline data, flawed methodologies, and unsupported conclusions render the assessment unreliable. These shortcomings hinder a thorough

evaluation of impacts on marine ecology and protected species, leading to the overall conclusion that the application does not have a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment presents significant flaws, characterised by gaps in evidence and inconsistencies that call its conclusions into question. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are in decline. However, the application does not sufficiently demonstrate that these species will not be adversely affected. Key foraging areas and migratory pathways are located in the development area, yet the assessment fails to rigorously evaluate issues such as displacement, collision risk, or habitat loss.

A critical contradiction arises within the application; the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This inconsistency undermines the reliability of the assessment, suggesting that the conclusions drawn lack support from the evidence presented. Furthermore, the assessment does not adequately establish that seabirds associated with protected sites, like the Lewis Peatlands and St Kilda, will be unaffected. It inadequately accounts for the significance of these feeding grounds, and reliance on modelling approaches injects uncertainty, particularly concerning species experiencing severe decline, such as Kittiwakes and Fulmars. The methodologies employed are likely to understate mortality, especially where baseline data is lacking and behavioural responses are not fully understood.

The placement of turbines within a recognised migratory corridor presents an additional and substantial risk, creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently analyse the long-term consequences of sustained mortality in this corridor or the potential impacts on species with comparatively small global populations.

From a regulatory viewpoint, the application fails to meet the evidential threshold needed to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data deficiencies and modelling weaknesses, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, hindering a lawful conclusion in favour of consent. Additionally, the identified deficiencies signify non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The failure to demonstrate that internationally significant seabird populations will not be adversely impacted positions the proposal in direct opposition to national policy.

In summary, the assessment is rendered unreliable due to its internal inconsistencies, methodological deficiencies, and lack of sufficient evidence. These inadequacies obstruct a thorough evaluation of potential impacts and contribute to the overall assertion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage is seriously lacking and does not acknowledge the West Lewis coastline as a vibrant cultural landscape where environment, tradition, language, and community are deeply intertwined. The application takes a narrow view, treating heritage as disconnected, unchanging assets instead of recognising their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming is how culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas are handled. These sites serve as active burial places and spiritual locations, yet the assessment treats them as fixed features, overlooking their current use, significance, and the potential impact of development on their surroundings. This misrepresentation leads to an incomplete assessment of cultural effects and fails to acknowledge their importance in community life.

The assessment also neglects to consider intangible cultural heritage elements, such as the Gaelic language and local traditions, as well as the enduring connection between the community and the coastal environment. These aspects are crucial to the area's identity but are entirely omitted from the evaluation, representing a major gap. Without addressing these factors, the true cultural impact of the development cannot be adequately grasped.

There are additional concerns regarding community rights and involvement. The Gaelic-speaking population has a unique cultural identity, recognised as characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the validity of the assessment and does not adhere to established principles of involvement in decisions that affect cultural and environmental matters.

A significant procedural error is the failure to conduct a compliant Island Communities Impact Assessment, which is required by the Islands (Scotland) Act 2018. Without this assessment, the relevant authority is unable to meet its legal obligations to evaluate the social, cultural, and economic effects on the island community. This absence alone makes lawful determination impossible.

From a policy standpoint, these shortcomings put the proposal at odds with National Planning Framework 4, especially regarding the protection of historic assets and places. The oversight of both tangible and intangible heritage, along with the failure to recognise living cultural practices, is a clear deviation from policy expectations.

In summary, the neglect of living heritage, intangible cultural values, community rights, and statutory requirements results in a significant evidential gap. The cultural impacts of the development have not been properly assessed, and the application fails to provide an adequate foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development raises significant concerns regarding its social impacts, health, and wellbeing, as the evaluation provided is materially deficient and lacks the necessary transparency for a lawful assessment. Although a Social Impact Assessment was commissioned by the developer, which included focus groups with local residents, the full report remains unpublished. This lack of disclosure creates a substantial evidential gap, hindering both public understanding and the competent authority's ability to assess the full extent of the social risks identified in the developer's own research.

Residents are reportedly experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal, as indicated by available summaries. These impacts arise from direct engagement with the community and are therefore not speculative. However, without access to the complete assessment, proper scrutiny of these findings is unattainable, limiting the ability to ascertain their significance in the decision-making process.

Moreover, there is evidence suggesting that the proposal threatens community identity and cohesion, with references to “cultural loss” emerging from the developer's findings. Unfortunately, these critical impacts have not been adequately considered in the main application, nor have they been given the appropriate weight they deserve. The failure to disclose the entire Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency significantly undermines the Environmental Impact Assessment process. Understanding the social, economic, and health impacts is vital for developments of this magnitude, especially when community character and functioning may be at stake. The absence of the complete dataset means that the application does not present a thorough evidential basis to assess the balance of benefits and harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments should foster positive health outcomes and mitigate harm; however, the evidence available points to existing adverse effects that have not been fully revealed. Without the complete assessment, it is impossible to demonstrate adherence to this policy.

The procedural implications of this situation are considerable. The competent authority is unable to carry out a robust socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a material omission in the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

In conclusion, the non-disclosure of the full Social Impact Assessment, alongside evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This inadequacy obstructs a lawful determination and reinforces the assertion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual impacts associated with the proposal is severely lacking and does not sufficiently capture the scale of change or the sensitivity of the West Lewis coastline. This area is characterised by its open Atlantic horizon, undeveloped nature, and significant remoteness. The introduction of large-scale turbines near the shoreline would create a continuous industrial presence that fundamentally alters this character, leading to a permanent and irreversible transformation of the landscape.

The application fails to adequately reflect the magnitude of visual change anticipated. Given their size and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations. Such an impact would directly affect visual amenity and compromise the essential qualities of naturalness and remoteness. The assessment does not convey the extent of this impact or its significance within the context of such a sensitive landscape.

There are also significant methodological issues concerning the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints might not adequately represent the most sensitive receptors or worst-case scenarios, particularly in relation to key cultural heritage sites and high-value landscapes. This raises concerns that the visual impact has been understated, which undermines the reliability of the assessment.

Another critical shortcoming is the lack of an assessment of the interconnected

relationship between landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are situated within a broader landscape setting that is visually and spatially connected to the Atlantic horizon. The assessment treats these assets as isolated, failing to acknowledge their interdependence, which results in an incomplete evaluation of impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and severing their connection to the natural horizon. This represents not only a visual impact but also a broader cultural and spatial harm that has not been thoroughly assessed in the application.

From a policy standpoint, the proposal conflicts with National Planning Framework 4 concerning the safeguarding of natural places and historic assets. The anticipated scale of change is incompatible with the obligation to protect landscape character, visual amenity, and the setting of culturally significant sites. The lack of a robust worst-case assessment further undermines any claims of compliance with policy.

Furthermore, the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would render their presence dominant and unavoidable. Consequently, the resulting change would be fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation.

Collectively, these deficiencies prevent a reliable evaluation of the proposal and reinforce the conclusion that it is incompatible with the protection of this landscape. The assessment does not accurately reflect the scale of impact, the sensitivity of the environment, or the interconnected nature of landscape and heritage.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is inadequate, lacking the detail necessary to evaluate potential environmental effects. The proposal entails considerable seabed preparation and installation works in a high-energy Atlantic environment. However, the application does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that would be created after consent is granted, which hampers any meaningful evaluation of their effectiveness or sufficiency.

This reliance on unspecified future measures is especially troubling given the sensitivity of the environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are at risk of sediment disturbance and contamination. While the application acknowledges risks like sediment mobilisation and accidental spills of

chemicals or oil, it does not provide adequate information on how these risks will be prevented, controlled, or monitored.

There is uncertainty regarding the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. Without thorough modelling and well-defined management strategies, it is impossible to assess the extent, duration, or ecological consequences of these impacts. This uncertainty also applies to potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment.

The lack of detailed emergency response procedures intensifies these concerns. By postponing contingency planning until after consent, the application obstructs the evaluation of whether adequate measures are in place to address pollution incidents. This introduces procedural risk and weakens the ability of the competent authority to assess environmental protection measures during the determination process.

From a regulatory standpoint, deferring essential environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation need to be evaluated prior to granting consent, and if this information is absent, a lawful determination cannot be achieved. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts result in a materially deficient assessment. These deficiencies hinder a thorough evaluation of construction and pollution risks and further indicate that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment fails to provide a thorough evaluation of fisheries and marine life, lacking a robust analysis of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and support an active fishing industry. However, the application does not adequately demonstrate how these habitats and activities can be safeguarded from significant disruption.

A critical flaw lies in the assumption that fishing activities can be displaced without repercussions. The application lacks evidence to suggest that alternative fishing grounds are available, accessible, or capable of accommodating additional pressure. This significant oversight increases the risk of overfishing in other areas, which could have broader economic repercussions for the local fishing fleet. Without a sound and evidence-based evaluation, the effects on fisheries and local livelihoods remain

unclear.

Moreover, the proposal poses considerable risks to marine species, particularly due to the underwater noise associated with construction activities. The use of high-energy hammer piling for an extended duration is expected to cause disturbances over large distances, negatively impacting species such as dolphins. The anticipated disruption to a considerable proportion of the local bottlenose dolphin population raises serious concerns; yet, the application minimizes the significance of these effects without adequate supporting evidence.

There is a notable inconsistency in the application, which acknowledges the necessity for licences to permit harm to European Protected Species while simultaneously characterising these impacts as negligible. This contradiction undermines the reliability of the assessment and raises questions about adherence to the Habitats Regulations, especially where harm is expected to a degree that warrants legal authorisation.

Furthermore, the assessment overlooks the cumulative impacts stemming from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is essential, as it is critical to understanding the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate compliance with the National Planning Framework 4 or the National Marine Plan. It does not illustrate that the development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity, thus preventing any conclusion that the proposal constitutes sustainable development.

In summary, the deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions render the assessment inadequate and unreliable. These shortcomings hinder a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents a range of significant risks and gaps that undermine its reliability and legality. The routing of infrastructure through active croft land raises concerns over potential conflicts with existing land use and legal rights. There is insufficient evidence provided to demonstrate that the necessary consents or processes have been initiated, which calls into question the deliverability and lawful implementation of the project.

The proposal also fails to adequately address the critical issue of carbon balance. Disturbances to peatland release stored carbon, leading to a carbon debt that could contradict the aims of renewable energy development. Without demonstrating that the overall carbon balance remains beneficial, the application lacks a crucial component necessary for a proper assessment.

Moreover, there are serious implications for sensitive habitats such as machair systems and peatland environments that are afforded policy protection. The application does not show that these habitats have been thoroughly assessed or that appropriate avoidance measures have been implemented, indicating a clear evidential gap regarding biodiversity protection.

The assessment of onshore infrastructure is fundamentally flawed and incomplete, failing to consider the interconnected nature of the offshore turbines and onshore works. This fragmented approach obscures the true scale of environmental and socio-economic effects that arise from what is a single integrated project. The onshore components, including cabling across protected moorland and the construction of a substation near Stornoway, involve excavation in areas of deep peat, particularly within Barvas Moor, which is a significant carbon store and ecologically sensitive habitat. The lack of a comprehensive assessment of these impacts hinders a full understanding of the project's overall environmental footprint.

Additionally, the separation of offshore and onshore elements prevents the proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project are considered together. However, by treating them separately, the combined impacts on peatlands, habitats, and communities remain inadequately understood.

From a policy standpoint, the failure to evaluate the project as a whole and demonstrate protection for peatlands, habitats, and land use interests is in conflict with the National Marine Plan and National Planning Framework 4. The inability to prove that impacts can be avoided or mitigated further diminishes the application's validity. Collectively, these factors render this part of the application incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment is notably deficient in its evaluation of dark skies and nocturnal wildlife, which constitutes a significant oversight. The West Lewis coastline is renowned for its remarkably dark skies, integral to the area's environmental quality, cultural identity, and tourism appeal. The proposal to install permanent red aviation lighting would result in a pervasive and disruptive "wall of light" effect along the

western horizon, which would drastically change the night-time environment.

There is a lack of assessment regarding the implications of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This oversight is particularly critical given the area's identity and the burgeoning astro-tourism sector that relies on preserving dark skies. The failure to evaluate these impacts introduces a notable gap in the overall landscape and environmental assessment.

Furthermore, there is no analysis of how such lighting may affect nocturnal wildlife. Species like the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel exhibit heightened sensitivity to artificial lighting, which can cause disorientation and elevate collision risks. The absence of a lighting impact assessment or a phototaxis study means that the potential adverse effects of aviation lighting on these species, and the associated increase in mortality rates, remain unexamined.

This shortcoming is exacerbated by the dependence on daytime survey data in the ornithological assessment, which fails to account for nocturnal behaviours and associated risks. For instance, Kittiwakes, which may forage or migrate during the night, also face disorientation due to artificial light. The lack of site-specific night-time data creates a significant gap in understanding the ecological consequences.

Without a thorough examination of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would be negatively impacted. The evidential standard required to demonstrate the absence of adverse effects beyond reasonable scientific doubt is not met, thereby invoking the precautionary principle and hindering lawful determination.

From a policy standpoint, the omissions in the assessment contradict National Planning Framework 4 regarding the safeguarding of natural environments and the quality of the environment itself. This lack of evaluation also detracts from a comprehensive assessment of landscape and seascape impacts, as the character of the night-time environment is a vital component of the overall setting.

In summary, the failure to address dark skies and nocturnal wildlife results in a significant evidential gap. The absence of baseline data, impact modelling, and targeted species analysis leads to an incomplete application that cannot adequately support a lawful determination.

TOURISM

The application acknowledges that 86% of visitors are attracted to the Isle of Lewis due to its scenery, yet it lacks a quantified analysis of how large-scale offshore

infrastructure may influence visitor numbers and overall economic contributions. The assessment of tourism impacts is critically deficient and does not evaluate the economic and social consequences for this vital sector.

Tourism on the island has experienced substantial growth, increasing from £65 million in 2017 to over £81.5 million. This growth supports more than 1,000 jobs and accounts for up to 16% of the local economy. However, the application neglects to model the potential effects of the industrialisation of the seascape and the subsequent loss of environmental quality on Tourism Gross Value Added and broader economic resilience. Without this essential analysis, it remains unclear whether the proposed development would yield a net economic benefit or harm an established and expanding sector.

Moreover, the assessment fails to consider the critical role that environmental quality plays in supporting tourism. The importance of unspoiled landscapes and dark skies is integral to visitor experience, particularly as emerging markets such as nature-based tourism and astro-tourism grow. The absence of a Dark Skies Assessment exacerbates this deficiency, leaving a considerable gap in understanding the potential impacts on a recognised and expanding segment of the local economy.

In an island community where economic diversification is limited, the omission of tourism impact assessments carries broader implications for employment, local businesses, and community sustainability. The lack of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been evaluated as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, especially regarding economic impact and the necessity of showing net benefit. It also contradicts strategic objectives that identify tourism as a priority growth sector and fails to provide adequate evidence for the competent authority to evaluate the economic consequences of the proposal.

In summary, the combined failure to quantify tourism impacts, assess the environmental drivers influencing visitor behaviour, and consider the island's economic dependency results in a significant evidential gap. This gap inhibits a thorough evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the criteria of sustainable development when evaluated against statutory obligations, national policy, and evidential standards. It mirrors the core

issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. This latest application is now presented within a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

The evidential basis provided by the application is neither complete nor reliable. There are notable deficiencies in baseline data, reliance on an undefined design envelope, and unspecified mitigation measures. Additionally, the application overlooks crucial impact pathways, including those affecting nocturnal wildlife, the complete onshore infrastructure, and tourism implications. Consequently, the Environmental Impact Assessment is incomplete, hindering a thorough understanding of potential significant effects and residual impacts.

Furthermore, there are distinct procedural shortcomings. The lack of a compliant Island Communities Impact Assessment breaches statutory duties as outlined in the Islands (Scotland) Act 2018. The omission of a comprehensive Social Impact Assessment further compounds these issues, obstructing the competent authority from effectively assessing the impacts on community wellbeing, cultural identity, and economic resilience. These inadequacies are enough to deem the application unsuitable for determination.

The proposal stands in direct opposition to the National Planning Framework 4, failing to demonstrate adequate protection for biodiversity, natural places, and cultural heritage. It does not provide evidence that health and wellbeing impacts are acceptable, nor does it show a net economic benefit due to the lack of tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore components has not been conducted properly, which obscures understanding of effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks are not only uncertain but potentially significant as well. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, inconsistent with each other. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful conclusion regarding acceptable impacts.

Additionally, the proposal would lead to considerable and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual relationships, and the impacts on tourism entail permanent effects that cannot be mitigated to an acceptable level.

In light of these numerous and serious concerns, the application is both procedurally and substantively unfit for determination. The scale of information gaps, alongside conflicts with policy and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority must either refuse consent on these grounds or invoke the appropriate regulatory measures to compel the submission of the missing information.

Therefore, I formally request that the application for the Spiorad na Mara Offshore Wind Farm be entirely refused.

Additional Comments

I am vehemently opposed to the industrialisation of our natural heritage. It is exploitative to put it mildly.

The impact of a project of this magnitude will impact negatively upon the rich diversity of marine and bird life. This flies in the face of logic when the implied message is one of environmentalism - it is in fact contrary to protecting the natural splendour of this geographical region.

The "Green/Renewables" industry is based on lies and deception and is a one of the largest frauds ever perpetrated against man and nature. Whilst on a smaller scale there are exceptions where this technology has a limited use, however the roll out keeping in line with Agenda 2030 and its forerunner Agenda 21 (which refers to the UN agenda for the 21st century), is corporate greenwashing, blatant obfuscation and fiduciary negligence bordering on malfeasance. In short, a scam backed by bad science.

The corporate interests do not give a damn about man or nature only valuing profit. The government bureaucrats in their backpockets are accomplices to this grand swindle that will leave an ugly stain upon the landscape and destructive consequences in its wake.

It's not just the offshore turbines, the entire infrastructure is an environmental crime in itself. Given the current alternatives, this is the only conclusion one can realistically arrive at. Clearly the contracts were rubber stamped over a decade ago, again a criminal act as such, much was obfuscated from the public eye. Backroom deals made in corporate boardrooms, bureaucratic toadies wined and dined and gods know what else.

The globalist mafia (UN; WEF; Palantir etc.,) has actually moved on from this archaic technology as the engine of AI/Quantum Computing. The technocratic panopticon is imminent and the technocratic wannabe feudal lords are acutely aware that this technology cannot power the data centres which consume vast quantities of resources.

They are currently backing SMR's (Small Modular Reactors) as a more viable means of energy production whist continuing to fund R and D of Cold Fusion.

The "renewables" industry is already a lame duck that has reached its peak but the payola continues unabated.

With all of this in mind I urge you to listen to not only the people but to reason. I don't expect you to but we will not be silenced. We keep fighting, fighting for the natural world and for a truly clean world for our descendents to inherit.

I shall end by invoking the Spirits of these lands to see to it that your nefarious and mindless eco-terrorism comes to nought.

So mote it be.

Member of Public 213

Objection To Spiorad na Mara Offshore Wind Farm
References: MD-00011742 & MD-00011743

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted under the marine licensing and Environmental Impact Assessment regimes. The concerns raised stem from a thorough examination of the Environmental Impact Assessment Report and accompanying documents, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural compliance. Situated off the west side of the Isle of Lewis, the proposed development exists in an area characterised by its Atlantic-facing coastline, near-pristine natural environment, and a strong cultural identity.

The application lacks a solid evidential foundation necessary for lawful determination. There are critical gaps in environmental data, while the baseline information presented is both limited and inconsistent, leaving many key elements of the proposal undefined. The reliance on a flexible design framework obstructs a clear understanding of potential significant effects, and the mitigation measures suggested remain unspecified, rendering their effectiveness unassessable. Consequently, the documentation does not facilitate a comprehensive understanding of environmental, cultural, or community impacts, with claims of negligible or non-significant effects lacking robust support.

Moreover, the proposal presents clear and substantive conflicts with policy. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. It fails to demonstrate compliance with national requirements intended to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests needed for consent and undermine the authority's ability to determine the proposal's acceptability in policy terms.

The unprecedented scale of the proposal, featuring large turbines in close proximity to the shoreline, raises substantial concerns about landscape capacity, visual dominance, and environmental impact. In light of the insufficient information provided, the reliance on undefined mitigation measures, evidential weaknesses, and clear non-compliance with policy, it is evident that the application is incomplete and unfit for lawful determination. Under these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant shortcomings and lacks a complete, transparent, and reliable evaluation of the potential environmental effects of the proposal. The introduction of a flexible Project Design Envelope, which lacks specific commitments to turbine dimensions, layouts, or configurations, creates considerable uncertainty and obstructs the consistent application of a worst-case scenario. This situation compromises the integrity of the assessment, making it impossible for both the public and the competent authority to grasp the true extent of environmental impacts that may arise from the development as ultimately constructed.

Additionally, the application heavily depends on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent based on the premise that environmental damage will be managed later hinders any meaningful evaluation of the effectiveness of these measures and the assessment of residual impacts. This postponement of essential information to post-consent phases is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which mandates that likely significant effects and mitigation strategies be clearly established prior to decision-making.

Furthermore, there are notable evidential inadequacies, including lapses in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. These issues lead to uncertainty regarding the magnitude and significance of impacts, particularly where claims of negligible or non-significant effects are made without robust supporting data. The lack of adequate information hampers a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot align with statutory obligations.

Consequently, the application does not fulfil the evidential requirements set forth under the Habitats Regulations, failing to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and vulnerable habitats. Moreover, the proposal does not demonstrate adherence to National Planning Framework 4, specifically concerning biodiversity protection and environmental integrity, as it cannot verify that impacts have been thoroughly assessed or that appropriate safeguards have been established.

In summary, the combination of reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data collectively undermine the reliability and completeness of the Environmental Impact Assessment Report. These deficiencies obstruct a lawful and thorough assessment of environmental effects, rendering the competent authority incapable of making a well-informed determination based on the information supplied.

ASSESSMENT OF ALTERNATIVES

The application does not meet the necessary statutory requirements of the Environmental Impact Assessment regime, particularly regarding the assessment of alternatives. Instead of providing a structured and reasoned comparison of feasible alternatives based on environmental impacts, it offers a narrative account of the project's evolution. This method fails to show that less harmful options have been properly identified, assessed, and selected over more damaging alternatives.

Moreover, there is a lack of transparent and evidence-based comparisons of alternative offshore locations, development scales, or design configurations. Notably, the application does not indicate that the developer has adequately considered the option of placing turbines further offshore, which could potentially lessen visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline and the critical role that proximity to the shore plays in determining impact, the absence of such analysis inhibits any conclusion that the proposed siting is the least damaging choice.

The shortcomings also apply to the assessment of cable routing and landfall, as there is inadequate evidence that alternative routes have been thoroughly explored to avoid or mitigate impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis suggests that mitigation through design has not been implemented, relying instead on measures to mitigate impacts after the design stage.

As a consequence, the application fails to show that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This indicates a failure to adhere to the established mitigation hierarchy, making it difficult for the competent authority to determine if less harmful and more suitable alternatives are available. Without a comprehensive assessment of alternatives, it cannot be determined that the proposal is sustainable or compliant with policy.

From a policy standpoint, this inadequacy undermines alignment with National Planning Framework 4, particularly concerning the protection of natural areas, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment represents a significant omission that contributes to the conclusion that the application has not been properly evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment presented regarding marine ecology and protected species is inadequate, failing to provide a comprehensive understanding of the ecological

receptors in the West Lewis coastal area. This marine environment is both sensitive and biologically active, yet the baseline data remains incomplete. The methodologies used do not effectively capture the presence, behaviour, and habitat use of species. Consequently, the assessment lacks a reliable evidential basis for evaluating potential impacts.

There is a significant oversight concerning otters, which are a European Protected Species. The application does not appropriately recognise or evaluate their active use of coastal areas for foraging and movement. This neglect of their core foraging range and behavioural patterns means the assessment does not adequately consider the potential effects of construction activities, noise, and increased human presence. As a result, the conclusions regarding the absence of significant impacts on this species are undermined.

Moreover, there are notable deficiencies in the assessment of basking sharks. The reliance on aerial surveys creates a substantial detection bias, particularly under Atlantic conditions. This methodology is likely to underestimate their presence, especially when compared to established land-based observations that indicate regular use of these waters. The failure to include or adequately consider such data leads to an incomplete baseline, compromising the reliability of the conclusions drawn.

These methodological shortcomings result in claims of negligible or non-significant effects being based on assumptions rather than solid evidence. The lack of sufficient baseline data also hinders a meaningful evaluation of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. This situation introduces uncertainty regarding the actual risks posed to marine species and their habitats.

From a regulatory standpoint, the application does not fulfil the requirements outlined in the Environmental Impact Assessment regime and National Planning Framework 4, as there has been inadequate identification and assessment of protected species. The uncertainty created prevents any conclusion about adverse effects from being excluded beyond reasonable scientific doubt, thus necessitating the application of the precautionary principle. Under these conditions, granting consent is not legally permissible.

In summary, the combination of incomplete baseline data, flawed methodologies, and unfounded conclusions renders the assessment unreliable. These issues impede a thorough evaluation of impacts on marine ecology and protected species, leading to the overarching conclusion that the application lacks a robust evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment presented is fundamentally flawed, with numerous gaps in evidence and contradictions that seriously undermine its conclusions. It fails to provide adequate assurance that the internationally important seabird populations on the west coast of the Isle of Lewis, many of which are already experiencing decline, will not be adversely affected. Key foraging areas and migratory pathways are directly impacted by the development, yet the implications of displacement, collision risk, and habitat loss are not thoroughly examined.

A critical inconsistency arises within the application itself. The developer claims there will be no significant adverse effects while simultaneously proposing a Habitats Regulations derogation case, which should only occur if significant harm is anticipated. This contradiction raises serious doubts regarding the credibility of the assessment, suggesting that its conclusions lack support from the underlying evidence.

The assessment does not convincingly demonstrate that seabirds linked to protected sites such as the Lewis Peatlands and St Kilda will remain unaffected. The significance of these vital feeding grounds is inadequately considered, and reliance on modelling techniques introduces a degree of uncertainty, particularly concerning declining species like Kittiwakes and Fulmars. The methodologies used appear to underestimate mortality rates, especially given the absence of complete baseline data and a full understanding of behavioural responses.

The positioning of turbines within a recognised migratory corridor introduces a substantial risk, effectively creating an obstacle in a primary flight path for species migrating between the United Kingdom and Iceland. The application fails to conduct a thorough assessment of the long-term effects of sustained mortality in this corridor or the potential repercussions for species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential requirements necessary to conclude that there will be no adverse effects on the integrity of protected sites. The presence of conflicting conclusions, coupled with significant data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This situation necessitates the application of the precautionary principle, thereby precluding a lawful conclusion in favour of consent.

Moreover, the identified deficiencies represent a breach of the National Planning Framework 4, particularly concerning the protection of biodiversity and the safeguarding of natural assets. The inability to substantiate that internationally

important seabird populations will remain unaffected places the proposal in direct opposition to national policy.

In summary, the assessment's reliability is compromised due to its internal contradictions, methodological flaws, and lack of sufficient evidence. These issues hinder a thorough evaluation of impacts and lead to the overall conclusion that the application does not fulfil the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The application lacks a comprehensive assessment of community rights and engagement, particularly regarding the Gaelic-speaking population, which embodies characteristics of an Indigenous People. Notably, there has been no process of Free, Prior and Informed Consent conducted, which undermines the legitimacy of the assessment. This absence of meaningful engagement fails to adhere to established principles concerning participation in decisions that affect cultural and environmental interests.

Furthermore, the evaluation of cultural heritage and community identity is fundamentally inadequate, as it overlooks the West Lewis coastline's status as a living cultural landscape, where environment, language, tradition, and community are intrinsically linked. The assessment adopts a reductive perspective, viewing heritage merely as a collection of isolated, static assets and neglecting their ongoing social, cultural, and spiritual significance within the community.

An important deficiency is found in the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are active sites of burial and spiritual practice; however, the assessment incorrectly categorises them as static features, disregarding their continued use, meaning, and the impact of development on their setting. This mischaracterisation leads to an incomplete evaluation of cultural effects and neglects their essential role in community life.

The application also fails to consider intangible cultural heritage, including the Gaelic language, traditions, and the longstanding relationship between the community and the coastal environment. These elements are central to the area's identity but are entirely omitted from the assessment, creating a significant gap. The cultural impact of the development remains unclear without the inclusion of these factors.

Moreover, a critical procedural oversight is evident in the lack of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. The absence of this assessment prevents the competent authority from fulfilling its legal obligation to evaluate the social, cultural, and economic impacts on

the island community, rendering the determination unlawful.

From a policy standpoint, these shortcomings place the proposal at odds with the National Planning Framework 4, especially regarding the protection of historic assets and places. The failure to adequately address both tangible and intangible heritage, along with the neglect of living cultural practices, is a clear deviation from policy requirements.

Collectively, the oversight in assessing living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential gap. The cultural impacts of the development have not been properly evaluated, and the application fails to establish a sufficient basis for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development raises serious concerns regarding its social impacts, health, and wellbeing. The developer has commissioned a Social Impact Assessment that included focus groups with local residents, but the complete report has not been made available. This lack of transparency creates a substantial evidential gap, hindering both public understanding and the competent authority's ability to fully grasp the social risks identified in the developer’s own research.

Residents are reportedly experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal, and these impacts stem from direct community engagement rather than speculation. However, without access to the full assessment, proper scrutiny of these findings is impossible, thereby limiting the capacity to evaluate their significance in the decision-making process.

The application is also seen as a potential threat to community identity and cohesion, with “cultural loss” being highlighted in the developer’s findings. Despite this recognition, these impacts have not been adequately addressed in the main application, nor have they been given the necessary weight. The withholding of the full Social Impact Assessment obscures the true human and social cost associated with the development.

Furthermore, this lack of transparency has serious implications for the Environmental Impact Assessment process. It is crucial to have a complete understanding of social, economic, and health impacts for developments of this magnitude, especially when community character and functioning could be jeopardised. By failing to provide the full dataset, the application lacks a comprehensive evidential basis to assess the balance of benefits against potential harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. It is essential that development promotes positive health outcomes and mitigates harm; however, the evidence at hand suggests existing adverse effects that have not been fully disclosed. The absence of the complete assessment renders compliance with this policy unprovable.

The procedural implications of this situation are significant. Without access to the full Social Impact Assessment, the competent authority is unable to conduct a thorough socio-economic and health evaluation. This omission is material and represents a failure to meet the evidential requirements outlined in the Environmental Impact Assessment regime.

Overall, the non-disclosure of the full Social Impact Assessment, alongside the documented existing adverse effects, results in an incomplete and unreliable evaluation. This situation obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts associated with the proposed development is significantly lacking and does not adequately account for the extent of change or the sensitivity of the surrounding environment. The West Lewis coastline is characterised by its expansive Atlantic horizon, undeveloped nature, and profound sense of remoteness. The introduction of large-scale turbines in close proximity to the shoreline would establish a dominant industrial presence, fundamentally altering this character and leading to a permanent and irreversible transformation of the landscape.

This application fails to accurately convey the magnitude of the visual change that would ensue. Due to their size and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and diminishing the intrinsic qualities of naturalness and remoteness. There is a notable shortcoming in how this impact is presented, failing to reflect its significance within such a sensitive landscape.

There are also serious methodological issues concerning the chosen visual viewpoints. Evidence indicates that these viewpoints may not sufficiently represent the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and valuable landscapes. This raises concerns that the magnitude of visual impact may have been understated, compromising the reliability of the assessment.

Additionally, the assessment does not adequately consider the interconnected nature of landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape setting, connected visually and spatially to the Atlantic horizon. The assessment treats these assets as isolated rather than acknowledging their interdependence, leading to an incomplete understanding of impacts on their context and cultural importance.

The industrialisation of the seascape would disrupt these relationships, changing the context in which heritage assets are perceived and severing their link to the natural horizon. This results in not just a visual impact but a wider cultural and spatial detriment that the application has not sufficiently evaluated.

From a policy standpoint, the proposal contradicts National Planning Framework 4 regarding the safeguarding of natural landscapes and historic assets. The level of change proposed is inconsistent with the imperative to preserve landscape character, visual amenity, and the context of culturally significant sites. Moreover, the lack of a thorough worst-case assessment further weakens any assertion of compliance with policy guidelines.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be unavoidable and overwhelming. The resultant change is therefore fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation efforts.

In summary, the assessment fails to accurately reflect the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings hinder a reliable evaluation and underscore the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal involves significant seabed preparation and installation works in a high-energy Atlantic environment. However, the assessment of construction and pollution risks is lacking in detail necessary for evaluating potential environmental effects. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included in the application. Instead, it relies on mitigation and contingency measures that will be prepared after consent, which does not allow for a meaningful evaluation of their adequacy or effectiveness.

The West Lewis coastline features clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. This makes the reliance on

undefined future measures particularly troubling. The application does acknowledge risks, such as sediment mobilisation and accidental chemical or oil spills, but it does not provide enough information on how these will be prevented, controlled, or monitored.

Furthermore, there is uncertainty about the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to determine the extent, duration, or ecological effects of these impacts. This uncertainty also relates to the potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. By delaying contingency planning until after consent, the application hinders the ability to evaluate whether appropriate safeguards are established to manage pollution events. This introduces procedural risks and undermines the competent authority's capacity to assess environmental protection measures at the point of determination.

From a regulatory standpoint, deferring essential environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. It is necessary to assess likely significant effects and mitigation before consent. The lack of such information means that a lawful determination cannot be achieved. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the lack of defined mitigation measures, detailed management plans, and the uncertainty regarding potential impacts result in a materially deficient assessment. These issues prevent a thorough evaluation of construction and pollution risks, further supporting the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The evaluation of fisheries and marine life in the application is inadequate, failing to present a solid analysis of ecological and socio-economic effects. The waters off the West Lewis coast are home to a vibrant marine ecosystem and an active fishing industry. However, the application does not prove that these habitats and uses can be preserved without causing significant disruption.

A major concern is the claim that fishing activities can be shifted without repercussions. The application lacks proof that alternative fishing areas exist, are accessible, or can handle increased fishing pressure. This gap is critical, as displacement could lead to overfishing in other locations, with potential negative

effects on the local fishing fleet's economy. Without a detailed and evidence-based analysis, it is impossible to fully grasp the implications for fisheries and community livelihoods.

The proposal also poses serious risks to marine species due to underwater noise from construction activities. The use of high-energy hammer piling for extended periods is expected to create disturbances that could affect marine life over large areas, specifically impacting dolphin populations. The anticipated disturbance to a significant segment of the local bottlenose dolphin population raises urgent concerns, yet the application diminishes the importance of these impacts without adequate evidence.

There is a notable inconsistency in the application, where the requirement for licences to authorise harm to European Protected Species is acknowledged, while impacts are simultaneously described as negligible. This contradiction undermines the assessment's credibility and raises issues related to compliance with the Habitats Regulations, especially where anticipated harm necessitates legal approval.

The analysis also overlooks the cumulative effects of various pressures, such as habitat disruption, noise pollution, and the displacement of fishing activities. A thorough examination of these combined impacts is necessary to determine the overall effects on marine ecosystems and socio-economic conditions.

From a policy viewpoint, the application fails to demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not prove that the proposed development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity, which hinders any assertion that the project constitutes sustainable development.

In summary, the absence of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions all contribute to an incomplete and unreliable assessment. These shortcomings obstruct a comprehensive evaluation of the potential effects on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The evaluation of the onshore infrastructure is fundamentally lacking, as it does not fully address the impacts associated with what constitutes a single integrated project. The interconnection between the offshore turbines and the onshore components is crucial, yet they have been assessed in isolation, leading to a disjointed understanding of the environmental and socio-economic repercussions.

The onshore aspects encompass cabling that traverses protected moorland, the

construction of a substation in proximity to Stornoway, and the necessary access infrastructure through delicate landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a vital carbon reservoir and ecologically important habitat. The current application fails to deliver a thorough assessment of these impacts, which hinders the comprehension of the project's overall environmental implications.

By neglecting or postponing the evaluation of onshore effects, the application obstructs an accurate appraisal of cumulative impacts. The Environmental Impact Assessment process mandates that all elements of a project be considered collectively; however, the division of offshore and onshore components means that the combined effects on peatlands, habitats, and local communities remain inadequately examined.

There are substantial risks posed to sensitive environments, including machair systems and peatland areas that are safeguarded by policy. The application does not provide evidence that the impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented. This results in a significant gap regarding the protection of biodiversity.

Concerns also arise regarding the carbon balance associated with the proposal. Disturbance of peatland releases stored carbon, potentially leading to a carbon debt that undermines the aims of renewable energy initiatives. The application does not sufficiently tackle this matter or show that the overall carbon balance remains advantageous.

Moreover, the routing of infrastructure through operational croft land presents possible conflicts with established land use and legal rights. The application lacks evidence that the requisite consents or processes have been initiated, prompting doubts about its feasibility and lawful execution.

From a policy standpoint, the failure to assess the project in its entirety and to demonstrate the protection of peatlands, habitats, and land use interests is inconsistent with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further weakens the application.

In summary, the fragmentation of project components, the absence of a comprehensive assessment, and the lack of proof concerning environmental and land use impacts render this part of the application inadequate and untrustworthy, ultimately obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of any assessment of dark skies and nocturnal wildlife represents a significant evidential gap within the Environmental Impact Assessment. The coastline of West Lewis is renowned for its exceptionally dark skies, which are crucial to environmental quality, cultural identity, and tourism value. The proposed development introduces permanent red aviation lighting that would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

The application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experience of residents and visitors. This oversight is particularly concerning given the vital role that dark skies play in the area's identity and the potential for developing tourism sectors like astro-tourism. Such omissions create a clear gap in the overall landscape and environmental assessment.

More alarmingly, there has been no evaluation of the impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are highly sensitive to artificial lighting due to phototaxis, leading to disorientation and an increased risk of collision. The lack of a lighting impact assessment or phototaxis study means that the application does not account for how aviation lighting may adversely affect these species or contribute to increased mortality rates.

This deficiency is exacerbated by the reliance on daytime survey data within the ornithological assessment, which fails to capture nocturnal activity or associated risks. Species such as Kittiwakes, which may forage or migrate at night, are also vulnerable to disorientation from artificial lighting, yet this risk has not been addressed. The lack of site-specific night-time data creates a critical gap in understanding the ecological impacts.

In the absence of an assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would face adverse effects. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt cannot be satisfied, invoking the precautionary principle and obstructing a lawful determination.

From a policy standpoint, this omission is at odds with National Planning Framework 4, which relates to the protection of natural places and environmental quality. It also undermines the broader evaluation of landscape and seascape impacts, as the character of night-time environments is integral to the overall ecosystem.

Ultimately, the lack of any assessment concerning dark skies and nocturnal wildlife renders the application incomplete and incapable of supporting a lawful determination, owing to the absence of baseline data, impact modelling, and species-specific analysis.

TOURISM

The assessment of tourism impacts is significantly lacking and does not evaluate the economic and social consequences for a crucial sector of the Isle of Lewis economy. Tourism is inherently reliant on the wild coastline, near-pristine landscape, dark skies, and sense of remoteness that the area offers. The application notes that 86% of visitors are attracted by scenery; however, it fails to provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism has seen substantial growth, increasing from £65 million in 2017 to over £81.5 million, and supports more than 1,000 jobs while accounting for up to 16% of the island's economy. Yet, the application does not model the potential effects of industrialising the seascape and the resulting loss of environmental quality on Tourism Gross Value Added or the broader economic resilience of the area. Without such analysis, it remains unclear whether the development would produce a net economic benefit or jeopardise an established and expanding sector.

Moreover, the assessment overlooks the crucial role of environmental quality in tourism, specifically the significance of unspoiled landscapes and dark skies for visitor experience and emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortcoming, leaving a substantial gap in understanding the impacts on a recognised and growing part of the local economy.

In an island community with limited economic diversification, the neglect to assess tourism impacts has broader implications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been examined as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, particularly regarding economic impact and the necessity to show net benefit. It also contradicts strategic objectives that recognise tourism as a priority growth sector and fails to provide adequate evidence for the competent authority to evaluate the economic consequences of the proposal.

Collectively, the failure to quantify tourism impacts, assess environmental factors that drive visitor behaviour, and consider the island's economic dependency leads to a significant evidential gap. This hampers a robust evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the requirements of sustainable development according to statutory duties, national policy, and evidential standards. The application reiterates the main issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. It is now submitted under a more rigorous policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant gaps in the evidential basis for determining the application. It lacks complete baseline data, utilises an undefined design envelope, depends on unspecified mitigation measures, and overlooks important impact pathways such as nocturnal wildlife, full onshore infrastructure, and the effects on tourism. Consequently, the Environmental Impact Assessment is inadequate, failing to provide a thorough understanding of potential significant effects or residual impacts.

Moreover, procedural shortcomings are evident. The lack of a compliant Island Communities Impact Assessment breaches statutory duty under the Islands (Scotland) Act 2018, while the omission of the full Social Impact Assessment represents a significant gap. These failures hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal contradicts National Planning Framework 4, as it does not adequately demonstrate protection of biodiversity, natural areas, and cultural heritage. It fails to show that health and wellbeing impacts are acceptable and cannot provide evidence of a net economic benefit due to the lack of tourism impact modelling. Furthermore, the cumulative effects of both offshore and onshore components have not been properly assessed, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks are uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in some areas. The necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been met, necessitating the application of the precautionary principle and preventing a lawful

conclusion that the impacts are acceptable.

The proposal would lead to significant and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual relationships, and the impact on tourism would result in permanent effects that cannot be adequately mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The considerable deficiencies in information, alongside policy conflicts and unresolved environmental risks, impede a lawful and evidence-based decision. The competent authority should refuse consent based on these grounds or invoke relevant regulatory provisions to mandate the submission of the missing information.

Therefore, a formal request is made for the application for the Spiorad na Mara Offshore Wind Farm to be entirely refused.

Additional Comments

I am deeply concerned about the proliferation of industrial wind turbine sites in our wild spaces, at sea and on land. This development is completely inappropriate for all the reasons given in this email.

Member of Public 214

Objection To Spiorad na Mara Offshore Wind Farm
References: MD-00011742 & MD-00011743

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. My concerns arise from a thorough review of the Environmental Impact Assessment Report and the accompanying documentation, which reveal serious deficiencies in planning, environmental considerations, cultural aspects, and procedural compliance. The proposed development is set to take place off the west side of the Isle of Lewis, a region celebrated for its Atlantic-facing coastline, nearly untouched environment, and rich cultural heritage. The scale and design of this proposal raise urgent questions about its adherence to statutory requirements, national policy, and the principles that underpin sustainable development.

The application lacks a sufficient evidential foundation necessary for a lawful determination. There is a notable absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Key elements of the proposal remain undefined, with a flexible design framework inhibiting a clear understanding of potential significant effects. Furthermore, the reliance on unspecified mitigation measures raises questions about their effectiveness, leaving the documentation inadequate for a comprehensive understanding of the environmental, cultural, or community impacts. Consequently, claims of negligible or non-significant effects lack robust supporting evidence.

Substantial policy conflicts are evident as well. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment requirements, or National Planning Framework 4. This inconsistency is particularly prominent concerning biodiversity, natural spaces, cultural heritage, and health and wellbeing. The application fails to prove that it meets national obligations for the protection of biodiversity, climate interests, and environmental integrity. These conflicts undermine the ability of the competent authority to assess the acceptability of the development within policy parameters.

The scale of this proposal is unprecedented for this area, with large turbines being positioned alarmingly close to the shoreline, thereby raising significant concerns about the landscape's capacity, visual impact, and overall environmental effects. When considered collectively, the lack of adequate information, dependence on undefined mitigation measures, evidential weaknesses, and clear non-compliance with policy all

indicate that the application is incomplete and unfit for a lawful determination. Under these circumstances, it is imperative that the precautionary principle be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and transparency, failing to deliver a dependable account of the anticipated environmental consequences of the proposal. One significant concern is the flexible Project Design Envelope that does not commit to specific dimensions, layouts, or configurations of turbines. This introduces considerable uncertainty and hampers the consistent application of a worst-case scenario analysis, thereby compromising the integrity of the assessment. As a result, the impacts outlined may not truly represent the final development, obstructing both the public and the competent authority from grasping the actual environmental effects involved.

Furthermore, the application is heavily reliant on mitigation measures, monitoring strategies, and management plans that have yet to be defined. Seeking consent on the premise that environmental harm will be managed at a later stage undermines meaningful evaluation of their effectiveness and precludes thorough assessment of residual impacts. This deferral of crucial information to stages following consent is procedurally unacceptable and contradicts the core purpose of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation measures must be clearly established prior to determination.

There are also notable gaps in evidence, which include shortcomings in baseline data, methodological limitations, and the use of assumptions in lieu of site-specific evidence. Such deficiencies lead to uncertainty concerning the scale and significance of impacts, especially where claims of negligible or non-significant effects are made without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, resulting in scientific uncertainty that cannot satisfy statutory requirements.

Consequently, the application does not fulfil the evidential threshold mandated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, particularly regarding protected species and sensitive habitats. Additionally, the proposal fails to demonstrate adherence to National Planning Framework 4, which includes stipulations on biodiversity protection and environmental integrity, as it cannot be established that impacts have been thoroughly assessed or that appropriate safeguards are in place.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data culminate in an Environmental

Impact Assessment Report that is both unreliable and incomplete. These shortcomings hinder a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make an informed determination based on the information presented.

MARINE ECOLOGY AND PROTECTED SPECIES

The current application presents significant deficiencies in its assessment of marine ecology and protected species, failing to offer a comprehensive and reliable understanding of ecological receptors in the West Lewis coastal environment. This area is a highly sensitive and biologically active marine system, yet the baseline data provided is incomplete, and the methodologies employed do not adequately capture the presence, behaviour, and habitat use of species. Consequently, the assessment lacks a sound evidential foundation for evaluating potential impacts.

A notable oversight concerns otters, a European Protected Species, where the application inadequately acknowledges and evaluates their active utilisation of coastal regions for foraging and movement. The failure to consider their core foraging range and behavioural patterns leads to an insufficient assessment of the potential impacts resulting from construction disturbance, noise, and increased activity. This gap significantly undermines the conclusions regarding the absence of substantial effects on this species.

Additionally, the assessment of basking sharks reveals further shortcomings, as the reliance on aerial surveys introduces a considerable detection bias, especially under Atlantic conditions. This methodology is likely to underestimate their presence when compared with established land-based observations that indicate a frequent use of these waters. The omission of such relevant data results in an incomplete baseline, thereby compromising the reliability of the conclusions drawn.

These methodological flaws result in conclusions regarding negligible or non-significant effects being based on assumptions rather than on robust evidence. The lack of sufficient baseline data also impedes a meaningful evaluation of cumulative and indirect impacts, including seasonal variation and broader ecosystem interactions. This lack of clarity creates uncertainty regarding the true scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements outlined in the Environmental Impact Assessment regime and National Planning Framework 4, as the identification and assessment of protected species are inadequate. The uncertainty introduced by these deficiencies precludes the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In

light of these circumstances, it is not lawful to grant consent.

Ultimately, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These shortcomings hinder a thorough evaluation of impacts on marine ecology and protected species, leading to the conclusion that the application lacks a sufficient evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development presents significant flaws that undermine its conclusions, particularly concerning the severe decline of seabird populations on the west coast of the Isle of Lewis, which are internationally important. The application fails to provide the necessary evidence to demonstrate that these species will not be adversely affected, especially given that it is situated within critical foraging areas and migratory pathways. Important risks such as displacement, collision, and habitat loss have not been adequately evaluated.

A critical inconsistency arises within the application, where the developer claims no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which should only be necessary when significant harm is anticipated. This contradiction casts doubt on the credibility of the assessment, revealing that its conclusions lack support from solid evidence. The study does not adequately protect seabirds linked to designated sites, including the Lewis Peatlands and St Kilda, failing to fully account for the significance of these feeding grounds. The reliance on modelling further introduces uncertainty, particularly regarding species like Kittiwakes and Fulmars, which are in sharp decline. Methodologies employed are likely to underestimate mortality rates, particularly due to incomplete baseline data and a lack of understanding regarding behavioural responses.

Additionally, the placement of turbines within an established migratory corridor poses an alarming risk by creating an obstacle along a primary flight path used by birds migrating between the United Kingdom and Iceland. The application does not sufficiently consider the long-term implications of persistent mortality within this corridor or the potential effects on species with small global populations.

From a regulatory standpoint, the application does not meet the necessary evidential threshold to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, alongside data deficiencies and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, rendering any conclusion in favour of consent unlawful.

Moreover, the identified deficiencies reflect a failure to adhere to the National Planning Framework 4 concerning biodiversity protection and the preservation of natural assets. The inability to show that internationally significant seabird populations will not be adversely affected directly conflicts with national policy.

Overall, the assessment's reliability is compromised by internal contradictions, methodological flaws, and insufficient evidence. These issues hinder a thorough evaluation of the impacts and affirm that the application does not satisfy the legal requirements necessary for determination.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the seascape, landscape, and visual impacts is significantly inadequate, failing to capture both the extent of change and the sensitivity of the environment. The West Lewis coastline, characterised by its open Atlantic horizon and undeveloped nature, possesses a profound sense of remoteness. The proposed installation of large-scale turbines near the shoreline would impose a continuous industrial presence that fundamentally alters this unique character, leading to a permanent and irreversible transformation of the landscape.

The application lacks an adequate representation of the magnitude of the visual changes that would occur. The size and proximity of the turbines would dominate views from residential areas, historical sites, and popular coastal locations, thereby directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment does not effectively communicate the significance of these impacts within the context of such a sensitive landscape.

Moreover, there are serious concerns regarding the choice and presentation of visual viewpoints. Evidence indicates that these viewpoints may not adequately reflect the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This oversight raises the possibility that the visual impacts have been underestimated, which further compromises the validity of the assessment.

A critical shortcoming is the failure to recognise the interconnected relationship between the landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape framework, connected visually and spatially to the Atlantic horizon. The assessment approaches these heritage assets as isolated entities, neglecting their interdependence and leading to an incomplete evaluation of the impacts on their context and cultural significance.

The proposed industrialisation of the seascape would disrupt these relationships, altering how heritage assets are perceived and severing their connections to the natural horizon. This constitutes not only a visual impact but also inflicts broader cultural and spatial damage that has not been sufficiently assessed within the application.

From a policy perspective, the proposal is at odds with National Planning Framework 4, which seeks to protect natural places and historic assets. The anticipated scale of change is inconsistent with the need to preserve landscape character, visual amenity, and the context of culturally significant sites. The lack of a thorough worst-case assessment further weakens any claims of compliance with policy requirements.

It is also evident that the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would result in an unavoidable and dominant presence. The changes involved are fundamental and permanent, rather than reducible to an acceptable level through mitigation measures.

In summary, the assessment fails to accurately reflect the extent of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These deficiencies hinder a reliable evaluation and support the conclusion that the proposal is incompatible with the protection of this landscape.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal involves the assessment of onshore infrastructure, which is incomplete and does not consider the full range of impacts related to a single integrated project. The offshore turbines and onshore works are closely connected; however, they are evaluated separately, leading to a fragmented view that does not reveal the complete environmental and socio-economic consequences.

The onshore aspects consist of cabling through protected moorland, the construction of a substation near Stornoway, and related access infrastructure across delicate landscapes. These activities entail excavation in areas of deep peat, notably within Barvas Moor, a crucial carbon store and ecologically sensitive area. The application lacks a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By not addressing onshore impacts or postponing their assessment, the application fails to allow for a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be evaluated together. However, the division between offshore and onshore elements means the collective impacts on peatlands, habitats, and local communities remain unclear.

There are considerable risks to sensitive habitats, including machair systems and peatland environments, which are protected by policy. The application does not prove that impacts on these habitats have been fully evaluated or that suitable avoidance measures are in place, resulting in a significant gap in evidence regarding biodiversity protection.

The proposal also presents issues related to carbon balance. Disturbing peatland releases stored carbon, possibly creating a carbon debt that contradicts renewable energy objectives. This matter is inadequately addressed in the application, which fails to show that the overall carbon balance is advantageous.

Moreover, routing infrastructure through active croft land may lead to conflicts with existing land use and legal rights. The application does not provide proof that the required consents or processes have been initiated, raising concerns about the project's deliverability and legal compliance.

From a policy standpoint, the failure to evaluate the project comprehensively and to demonstrate the protection of peatlands, habitats, and land use interests is inconsistent with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further diminishes the application’s credibility.

Overall, the separation of project components, the absence of a thorough assessment, and the lack of evidence regarding environmental and land use impacts render this part of the application incomplete and untrustworthy, obstructing lawful determination.

TOURISM

The failure to adequately assess the impacts on tourism represents a significant oversight, particularly given the importance of this sector to the Isle of Lewis's economy. Tourism thrives on the region's stunning coastline, largely untouched landscape, dark skies, and sense of remoteness. Despite the application indicating that 86% of visitors are attracted by the scenery, it lacks a thorough evaluation of how large-scale offshore infrastructure could potentially influence visitor numbers, behaviours, and the overall economic contribution of tourism.

This sector has seen remarkable growth, expanding from £65 million in 2017 to over £81.5 million, and it supports more than 1,000 jobs, representing up to 16% of the island's economy. However, the application does not consider how the industrialisation of the seascape and subsequent decline in environmental quality might affect Tourism Gross Value Added or the broader economic resilience of the island. Without a comprehensive analysis, it remains unclear if the proposed development would bring a

net economic advantage or jeopardise this vital and growing sector.

Moreover, the assessment overlooks the crucial role that environmental quality plays in supporting tourism. The significance of unspoiled landscapes and dark skies to the visitor experience is particularly pertinent, especially for emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment only exacerbates this shortcoming, resulting in a critical gap in understanding the impacts on an increasingly recognised segment of the local economy.

For a community that relies heavily on tourism and has limited economic diversification, the neglect of tourism impact assessments has far-reaching consequences for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment further means that these economic vulnerabilities have not been properly evaluated, as required by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, especially concerning economic impact and the necessity of showing net benefits. It contradicts strategic objectives that prioritise tourism as a growth sector and fails to supply sufficient evidence for the competent authority to gauge the economic implications of the proposal.

In summary, the collective failures to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and acknowledge the island's economic dependence result in a significant evidential gap. This gap undermines a robust evaluation of the economic consequences, leading to the conclusion that the application remains incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria of sustainable development, as assessed against statutory duties, national policy, and evidential standards. This application mirrors the principal issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, which was rejected due to unacceptable industrialisation. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the current application still falls short.

There are significant gaps in the evidential basis necessary for determining the application. The use of an undefined design envelope, the reliance on unspecified mitigation measures, and the omission of essential impact pathways—including those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism—

further undermine its validity. Consequently, the Environmental Impact Assessment lacks completeness, preventing an accurate understanding of likely significant effects or residual impacts.

Moreover, procedural deficiencies are evident, notably the absence of a compliant Island Communities Impact Assessment, which breaches statutory duty under the Islands (Scotland) Act 2018. The failure to fully disclose the Social Impact Assessment represents a material omission, impeding the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These shortcomings deem the application unfit for determination.

The application also stands in direct contradiction to National Planning Framework 4. It fails to demonstrate adequate protection for biodiversity, natural places, and cultural heritage, lacks evidence that health and wellbeing impacts are acceptable, and cannot substantiate a net economic benefit, particularly due to the absence of tourism impact modelling. Furthermore, the cumulative effects of both offshore and onshore elements have not been adequately assessed, clouding the evaluation of impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are both incomplete and inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been achieved, thus invoking the precautionary principle and precluding any lawful conclusion that impacts are acceptable.

This proposal would bring about substantial and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, loss of dark skies, disruption of cultural and visual relationships, and negative impacts on tourism represent permanent consequences that cannot be effectively mitigated.

In summary, the application is procedurally and substantively unfit for determination. The multitude of information deficiencies, coupled with policy conflicts and unresolved environmental risks, obstruct a lawful and evidence-based decision. The competent authority is therefore urged to refuse consent on these grounds or to invoke the relevant regulatory provisions to demand the submission of the missing information.

Consequently, a formal request is made for the refusal of the application for the Spiorad na Mara Offshore Wind Farm in its entirety

Member of Public 215

Objection To Spiorad na Mara Offshore Wind Farm
References: MD-00011742 & MD-00011743

Dear Sir/Madam

This letter formally objects to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the marine licensing and Environmental Impact Assessment regimes. The development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The concerns regarding this proposal stem from its scale, proximity, and design, which raise fundamental issues about its alignment with statutory requirements, national policy, and sustainable development principles.

The application presents significant shortcomings, as it lacks an adequate evidential basis for lawful determination. There are critical gaps in environmental data, and the baseline information provided is limited and inconsistent. Moreover, key elements of the proposal remain undefined. The flexible design framework obscures a clear understanding of potential significant effects, and the reliance on unspecified mitigation measures hinders any assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects are not substantiated by robust evidence.

Substantive policy conflicts are evident, as the proposal appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This is particularly relevant to biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not convincingly demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests necessary for consent, undermining the competent authority's ability to determine the development's acceptability in policy terms.

The scale of the proposed development is unprecedented for this location, with large turbines planned in close proximity to the shoreline. This introduces significant concerns related to landscape capacity, visual dominance, and overall environmental impact. When considering the absence of sufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance, it is evident that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents substantial shortcomings that compromise its reliability and transparency in addressing the environmental effects of the proposal. A significant issue lies in the use of a flexible Project Design Envelope, which lacks specific commitments to turbine dimensions, layouts, or configurations. This uncertainty hampers a consistent application of worst-case scenarios, thereby questioning the integrity of the assessment and obscuring the true extent of environmental impacts from both the public and competent authorities.

The proposal's reliance on yet-to-be-defined mitigation measures, monitoring strategies, and management plans further complicates the situation. Seeking consent based on the premise that environmental harm will be mitigated at a later stage impedes any meaningful evaluation of effectiveness or residual impacts. This postponement of critical information until post-consent stages undermines the procedural integrity of the Environmental Impact Assessment regime, which mandates the clear establishment of likely significant effects and mitigation prior to determination.

Moreover, the application is marred by significant evidential deficiencies, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. Such shortcomings create uncertainty surrounding the scale and significance of impacts, especially where negligible or non-significant effects are asserted without robust supporting data. The lack of sufficient information hinders a comprehensive understanding of cumulative and worst-case impacts, leading to scientific uncertainties that conflict with statutory obligations.

Consequently, the application fails to meet the evidential threshold required under the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This situation activates the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it does not convincingly show that impacts have been thoroughly assessed or that adequate safeguards are in place.

In summary, the combination of an undefined design envelope, lack of specified mitigation, and gaps in baseline data results in an Environmental Impact Assessment Report that is both unreliable and incomplete. These deficiencies obstruct a lawful and thorough assessment of environmental effects and leave the competent authority unable to make a determination based on the information provided.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development raises serious concerns regarding its social impacts, health, and wellbeing, which have not been adequately addressed. A Social Impact Assessment was commissioned by the developer, including engagement with local residents through focus groups. However, the full report has not been made available, leading to a significant evidential gap that hinders both the public's understanding and the competent authority's ability to fully grasp the social risks identified by the developer's research.

Residents are reportedly experiencing stress, anxiety, and concern related to the scale and proximity of the proposal, as indicated in available summaries. These effects stem from direct engagement with the community and are therefore based on real experiences rather than speculation. The failure to disclose the complete assessment restricts proper scrutiny of these findings and affects the evaluation of their importance in the decision-making process.

Additionally, the proposal has been viewed as a threat to community identity and cohesion, with a noted risk of "cultural loss" highlighted in the developer's findings. Despite this acknowledgment, such impacts have not been adequately incorporated into the main application, nor have they been afforded appropriate consideration. The lack of transparency surrounding the full Social Impact Assessment conceals the true human and social costs associated with the development.

This deficiency in disclosure compromises the Environmental Impact Assessment process. For developments of this magnitude, a thorough understanding of social, economic, and health implications is crucial, especially when community character and functionality may be impacted. The absence of the complete dataset means that the application lacks a comprehensive evidential foundation for evaluating the balance between potential benefits and harms.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 concerning health and wellbeing. Developments are expected to foster positive health outcomes and mitigate harm; however, the available evidence suggests existing negative effects that have not been fully revealed. Without the complete assessment, it is impossible to prove compliance with this policy.

The procedural ramifications of these omissions are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a significant omission within the application, failing to meet the evidential requirements established by the Environmental Impact Assessment framework.

In summary, the non-disclosure of the full Social Impact Assessment, coupled with evidence of pre-existing adverse effects, results in an incomplete and unreliable evaluation. This situation precludes a lawful determination and reinforces the assertion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment regarding seascape, landscape, and visual impacts is fundamentally lacking and does not truly capture the extent of the change or the sensitivity of the environment that will be affected. The character of the West Lewis coastline is defined by its open Atlantic horizon, its undeveloped nature, and a pronounced sense of remoteness. Should large-scale turbines be introduced near the shoreline, they would create a continuous and overwhelming industrial presence, fundamentally transforming this character and resulting in a permanent and irreversible alteration of the landscape.

The application fails to accurately depict the magnitude of this visual change. Given their scale and proximity, the turbines would dominate views from residential areas, historic sites, and frequently visited coastal locations. This dominance would significantly detract from visual amenity and undermine the intrinsic qualities of naturalness and remoteness. There is a concerning inadequacy in the assessment, which does not convey the true level of impact or its importance in a landscape of such sensitivity.

Moreover, there are methodological issues with how visual viewpoints have been selected and presented. Evidence indicates that these viewpoints may not comprehensively represent the most sensitive receptors or worst-case scenarios, especially regarding key cultural heritage sites and valuable landscapes. This raises the possibility that the visual impact has been understated, which undermines the credibility of the assessment.

Another significant shortcoming is the neglect to evaluate the interconnected relationship among landscape, seascape, and cultural heritage. Iconic sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape setting that is visually and spatially connected to the Atlantic horizon. The assessment treats these sites as isolated features instead of acknowledging their interdependence, leading to an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these vital relationships, altering how heritage assets are perceived and their connection to the natural horizon. This change represents not only a visual impact but also a more profound cultural and spatial harm that the application has not adequately considered.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 concerning the protection of natural places and historic assets. The scale of change is fundamentally incompatible with the necessity to safeguard landscape character, visual amenity, and the setting of culturally significant sites. The lack of a rigorous worst-case assessment further undermines any assertions of policy compliance.

Furthermore, it is evident that the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would make their presence dominant and unavoidable. Consequently, the resulting change is fundamental and permanent, incapable of being reduced to an acceptable level through mitigation measures.

In summary, the assessment fails to accurately reflect the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

TOURISM

The application does not adequately assess the impact on tourism, a crucial sector for the Isle of Lewis economy. This sector relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. Although it is noted that 86% of visitors are attracted by the scenery, there is no quantitative analysis of how large-scale offshore infrastructure could influence visitor numbers, behaviour, or the overall economic contribution.

Tourism on the Isle of Lewis has experienced substantial growth, increasing from £65 million in 2017 to over £81.5 million. This growth supports more than 1,000 jobs and represents up to 16% of the island's economy. However, the application does not examine how the industrialisation of the seascape and a decline in environmental quality could impact Tourism Gross Value Added or the broader economic resilience of the island. Without this crucial analysis, it remains unclear if the proposed development would generate a net economic benefit or harm an already established and growing sector.

The assessment neglects to address the significance of environmental quality in fostering tourism. Unspoiled landscapes and dark skies are vital to visitor experience, including emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, resulting in a considerable gap in understanding the impacts on a key and expanding part of the local economy.

In an island community with limited economic diversification, failing to evaluate the impacts on tourism carries broader ramifications for employment, local businesses, and community sustainability. The omission of a proper Island Communities Impact Assessment means these economic vulnerabilities have not been assessed in accordance with the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not show compliance with National Planning Framework 4, especially regarding economic impact and the need to demonstrate a net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector and lacks sufficient evidence for the competent authority to assess the economic implications of the proposal.

In summary, the inability to quantify tourism impacts, evaluate the environmental factors influencing visitor behaviour, and recognise the island's economic dependencies results in a significant lack of evidence. This hinders a thorough evaluation of the economic effects and supports the view that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development as outlined by statutory duties, national policy, and evidential standards. It mirrors the issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was a concern. This new application is presented within a stronger policy framework that places significant emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

A reliable evidential basis for determination is lacking, characterised by critical gaps in baseline data. The ongoing use of an undefined design envelope and reliance on unspecified mitigation measures further undermine its credibility. Additionally, important impact pathways, such as those affecting nocturnal wildlife, complete onshore infrastructure, and tourism implications, have been omitted. As a result, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of potential significant effects or residual impacts.

Moreover, there are notable procedural shortcomings. The lack of a compliant Island Communities Impact Assessment contravenes the statutory duty established under the Islands (Scotland) Act 2018, while the failure to disclose the complete Social Impact Assessment represents a significant omission. These shortcomings hinder the competent authority from properly evaluating impacts on community wellbeing, cultural identity, and economic resilience, making the application unsuitable for

determination.

In direct contradiction to National Planning Framework 4, the proposal does not demonstrate adequate protection for biodiversity, natural places, and cultural heritage. It fails to show that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. Furthermore, the cumulative effects of both offshore and onshore elements have not been thoroughly assessed, obscuring their impact on peatlands, carbon balance, habitats, and crofting land.

Uncertain and potentially significant environmental risks are present. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

The proposed development would bring about substantial and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual relationships, and negative impacts on tourism are permanent effects that cannot be mitigated to an acceptable level.

In summary, the application is both procedurally and substantively unfit for determination. The extent of informational deficiencies, combined with conflicts with policy and unresolved environmental risks, obstruct a lawful and evidence-based decision. The competent authority must either refuse consent based on these grounds or employ the relevant regulatory provisions to obtain the missing information.

Therefore, it is formally requested that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Additional Comments

To whom it may concern,

I understand the need for more renewable energy. However, this is exploitation.

Our island relies on tourism and the main attraction of our islands are the natural and rugged landscapes with their marine and bird life. If the offshore wind farm goes ahead, it will no doubt have a catastrophic impact.

Our sea, our landscapes and our way of life are all being affected and with little benefit.

There is no financial benefit. There is no guaranteed significant reduction to our energy bills. There is only benefit to Westminster, the Scottish Government, and of course to Northland Power.

We need to reduce our carbon emissions but without exploitation and without such negative impacts on small and vulnerable communities. Smaller scale windfarms providing energy locally is a much less invasive and fair method. Proceeding with a winddarm of this scale should only be considered in more industrial areas. Such places that do not rely so heavily on the natural landscape for tourism, well being, maintaining residency.

None of my fellow islanders are in support of this. There is a tangible negative effect on the well-being of the locals. Calling this windfarm “spiorad na mara” is both insulting and ignorant.

Member of Public 216

Objection To Spiorad na Mara Offshore Wind Farm
References: MD-00011742 & MD-00011743

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which is submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The objection is informed by a review of the Environmental Impact Assessment Report along with the supporting documentation, highlighting significant deficiencies across planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline and rich cultural identity, and concerns regarding its scale, proximity, and design raise important questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis for lawful determination, with critical environmental data missing and baseline information being limited and inconsistent. Additionally, many key aspects of the proposal remain undefined. The reliance on a flexible design framework complicates the understanding of likely significant effects, and the absence of specified mitigation measures makes it impossible to evaluate their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, and claims of negligible or non-significant effects are not substantiated by robust evidence.

Moreover, there are notable policy inconsistencies present. The proposal appears to contravene the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These inconsistencies directly affect the statutory tests necessary for consent and hinder the competent authority's ability to determine whether the development is acceptable from a policy standpoint.

The unprecedented scale of the proposal, with large turbines positioned in close proximity to the shoreline, raises substantial concerns about landscape capacity, visual dominance, and environmental impact. Collectively, the lack of sufficient information, reliance on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance illustrate that the application is incomplete and unable to support a

lawful determination. Under these circumstances, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks essential detail and fails to provide a full and reliable account of the potential environmental consequences of the proposal. There are significant evidential deficiencies, including gaps in baseline data and a reliance on assumptions rather than site-specific evidence. Such shortcomings lead to uncertainty about the scale and significance of impacts, particularly in cases where negligible or non-significant effects are suggested without robust supporting data. This lack of sufficient information hinders a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that conflicts with statutory requirements.

Moreover, the application's heavy reliance on mitigation measures, monitoring strategies, and management plans that are yet to be defined is troubling. Seeking consent on the basis that environmental harm will be addressed later prevents any meaningful evaluation of the effectiveness of these measures and obstructs the assessment of residual impacts. This postponement of crucial information until post-consent stages is procedurally unacceptable and contradicts the intent of the Environmental Impact Assessment regime, which stipulates that significant effects and mitigation must be clearly established before any determination.

The undefined Project Design Envelope compounds these issues by introducing uncertainty regarding specific turbine dimensions, layouts, and configurations. This lack of commitment prevents a consistent application of a worst-case scenario, undermining the integrity of the assessment. Consequently, the impacts presented may not accurately reflect the final development, hindering both public understanding and the competent authority's ability to gauge the true extent of environmental effects.

Together, these factors mean that the application does not satisfy the evidential threshold mandated under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to comply with National Planning Framework 4, particularly in relation to biodiversity protection and environmental integrity, as it remains unclear whether impacts have been fully assessed or appropriate safeguards established.

Overall, the combination of an undefined design envelope, absence of specific mitigation, and gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies obstruct a lawful and robust

assessment of environmental effects, leaving the competent authority unable to make an informed determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application fails to provide a structured and evidence-based comparison of realistic alternatives, which is a fundamental requirement of the Environmental Impact Assessment regime. Instead of offering a coherent assessment based on environmental effects, it presents a narrative account of project evolution. This approach does not adequately demonstrate that less harmful options have been properly identified and assessed in preference to more damaging solutions.

There is also a notable lack of transparency regarding alternative offshore locations, development scales, and design configurations. Specifically, the application does not show that the developer has thoroughly considered the possibility of placing turbines further offshore, where potential visual, ecological, and coastal impacts could be lessened. The sensitivity of the West Lewis coastline, along with the critical importance of proximity to shore when assessing impact, highlights the significance of this omission. Consequently, without such analysis, one cannot conclude that the proposed siting is the least damaging option.

Moreover, deficiencies are evident in the assessment of cable routing and landfall, as there is inadequate evidence to suggest that alternative routes have been sufficiently explored to avoid or minimise impacts on sensitive receptors, including areas of cultural and spiritual significance such as Barvas Cemetery. The lack of a clear avoidance strategy, coupled with the absence of comparative analysis, points to a failure to implement mitigation by design, instead relying heavily on post-design mitigation measures.

As a result, the application does not satisfactorily demonstrate that environmental harm has been minimised through effective site selection, layout, and infrastructure routing. This oversight represents a failure to adhere to the established mitigation hierarchy, which in turn prevents the competent authority from determining whether more appropriate and less harmful alternatives exist. Without a robust assessment of alternatives, it cannot be concluded that the proposal constitutes a sustainable or policy-compliant solution.

From a policy standpoint, this inadequacy undermines adherence to National Planning Framework 4, particularly concerning the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment represents a significant omission that contributes to the overall conclusion that the

application has not been thoroughly evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The application fails to meet the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it inadequately identifies and assesses protected species. The assessment of marine ecology and protected species presents significant deficiencies, particularly concerning the understanding of ecological receptors within the West Lewis coastal environment. This area represents a highly sensitive and biologically active marine system, yet the baseline data remains incomplete, and the methodologies employed do not sufficiently capture species presence, behaviour, and habitat use. Consequently, the conclusions drawn lack a sound evidential basis for evaluating potential impacts.

A notable shortcoming pertains to otters, classified as a European Protected Species, where the application does not adequately acknowledge their active use of coastal areas for foraging and movement. The failure to consider their core foraging range and behavioural patterns results in an inadequate assessment of the potential impacts of construction disturbance, noise, and increased activity. This oversight undermines any conclusions regarding the absence of significant effects on this species.

Furthermore, the assessment of basking sharks reveals additional deficiencies, as reliance on aerial surveys introduces considerable detection bias, particularly in Atlantic conditions. This methodological approach is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations indicating frequent use of these waters. The omission of relevant data further contributes to an incomplete baseline, weakening the reliability of the conclusions presented.

These methodological limitations result in assessments of negligible or non-significant effects being based on assumptions rather than robust evidence. The lack of sufficient baseline data hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions, thus generating uncertainty regarding the true scale of risk to marine species and habitats.

Overall, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions compromises the reliability of the assessment. These shortcomings inhibit a thorough evaluation of impacts on marine ecology and protected species, ultimately leading to the conclusion that the application does not possess a sufficient evidential foundation. In light of the uncertainty introduced, it cannot be reasonably concluded that adverse effects can be excluded beyond reasonable

scientific doubt, thereby engaging the precautionary principle and indicating that consent cannot be lawfully granted.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application is fundamentally flawed, containing significant gaps in evidence and internal contradictions that seriously undermine its conclusions. This area on the west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application does not demonstrate to the necessary evidential standard that these species will remain unaffected. The proposed development is sited within key foraging areas and migratory pathways, yet the implications of potential displacement, collision risk, and habitat loss have not been adequately evaluated.

A critical inconsistency exists within the application; the developer asserts there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This contradiction casts doubt on the reliability of the assessment and suggests that the conclusions drawn are unsupported by the underlying evidence. Furthermore, the assessment fails to provide adequate evidence that seabirds associated with protected sites, including the Lewis Peatlands and St Kilda, will not be negatively impacted. The importance of these feeding grounds is insufficiently acknowledged, and the reliance on modelling approaches introduces uncertainty, especially concerning species such as Kittiwakes and Fulmars, which are already in severe decline. The methodologies employed are likely to underestimate mortality rates, particularly where baseline data is lacking and behavioural responses are not fully understood.

The siting of turbines within a recognised migratory corridor presents an additional, significant risk, effectively creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term effects of sustained mortality within this corridor or the potential impacts on species with relatively small global populations.

From a regulatory viewpoint, the application does not satisfy the evidential threshold necessary to confirm there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, combined with data gaps and limitations in modelling, means that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle, preventing a lawful conclusion that would support consent.

The identified deficiencies reflect a failure to adhere to National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability

to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

Overall, the assessment is unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. These shortcomings hinder a thorough evaluation of the impacts and lead to the conclusion that the application does not meet the statutory requirements needed for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the application related to the West Lewis coastline is fundamentally flawed as it overlooks the area's status as a living cultural landscape, where the environment, language, tradition, and community are deeply interconnected. Rather than acknowledging the ongoing social, cultural, and spiritual functions of heritage, the application adopts a reductive perspective, treating heritage as a collection of isolated and static assets.

A significant shortcoming is evident in the treatment of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active locations for burial and spiritual practices, yet they are mischaracterised as static features in the assessment. This failure to consider their continued use and meaning, as well as the implications of development on their setting, results in an incomplete evaluation of cultural impacts and disregards their importance within community life.

Moreover, the assessment neglects intangible cultural heritage, such as the Gaelic language, local traditions, and the enduring connection between the community and the coastal environment. These elements are crucial to the area's identity but are not acknowledged, representing a significant oversight. The lack of consideration for these factors hinders a proper understanding of the cultural impact of the proposed development.

Concerns also arise regarding the rights of the community and the lack of engagement. The Gaelic-speaking population has a distinct cultural identity, recognised as part of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This absence of meaningful engagement raises questions about the legitimacy of the assessment and fails to adhere to established principles regarding participation in decisions that affect cultural and environmental interests.

A further critical issue is the lack of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The omission of this assessment prevents the competent authority from fulfilling its legal obligation to evaluate the social, cultural, and economic impacts on the island community, thereby

obstructing a lawful determination of the application.

From a policy standpoint, these deficiencies directly conflict with the National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to consider both tangible and intangible heritage, along with the disregard for living cultural practices, signifies a clear deviation from policy requirements.

In conclusion, the shortcomings in assessing living heritage, intangible cultural value, community rights, and compliance with statutory obligations create a significant evidential gap. The cultural impacts of the proposed development remain inadequately assessed, and the application does not provide a solid foundation for evaluating the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development lacks a complete assessment of social impacts, health, and wellbeing, which raises concerns regarding its transparency and legality. Although the developer commissioned a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This omission creates a significant evidential gap, hindering both public understanding and the competent authority's ability to grasp the full extent of social risks highlighted by the developer's own research.

Summaries available indicate that local residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement and are not speculative in nature. However, without access to the complete assessment, proper scrutiny of these findings is not possible, limiting the ability to ascertain their significance in the decision-making process.

Furthermore, evidence suggests that the proposal is viewed as a threat to community identity and cohesion, with "cultural loss" identified in the developer’s findings. Despite this, these social impacts have not been fully integrated into the main application or assigned adequate weight. The failure to disclose the full Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. An understanding of social, economic, and health impacts is vital for developments of this nature, especially when community character and functioning could be affected. The absence of the complete dataset means that the application does not provide a comprehensive evidential basis for evaluating the balance between benefits and harms.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Development should support positive health outcomes and mitigate harm, yet existing evidence points to adverse effects that remain undisclosed. Without the full assessment, it is not possible to establish compliance with this policy.

The procedural consequences are significant. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This constitutes a material omission within the application and represents a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, along with the evidence of existing adverse impacts, results in an incomplete and unreliable assessment. This situation prevents a lawful determination and reinforces the conclusion that the application is inadequately supported by necessary information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline features an open Atlantic horizon and an undeveloped character that contributes to its strong sense of remoteness. The proposed large-scale turbines, located close to the shoreline, would introduce an industrial presence that could fundamentally alter this character, leading to a permanent and irreversible transformation of the landscape.

The assessment fails to accurately represent the magnitude of the visual change that would occur. The turbines would dominate views from residential areas, historic sites, and popular coastal locations. This would negatively impact visual amenity and diminish the area's naturalness and remoteness. The current evaluation does not convey the significance of these impacts, especially given the sensitivity of the landscape.

Concerns arise regarding the selection and presentation of visual viewpoints in the assessment. Evidence indicates that the chosen viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and valuable landscapes. This raises the possibility that the assessment has understated the magnitude of the visual impact, affecting its reliability.

Additionally, the assessment does not consider the interconnectedness of landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments are linked to the wider landscape through visual and

spatial relationships with the Atlantic horizon. By treating these assets as isolated, the assessment fails to recognise their interdependence, resulting in an incomplete evaluation of impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, changing how heritage assets are perceived and their connection to the natural horizon. This not only represents a visual impact but also entails broader cultural and spatial harm that has not been sufficiently assessed in the application.

From a policy standpoint, the proposal conflicts with National Planning Framework 4, particularly regarding the safeguarding of natural places and historic assets. The scale of change proposed contradicts the requirements to protect landscape character, visual amenity, and the settings of culturally significant sites. Moreover, the lack of a thorough worst-case assessment further weakens any claims of policy compliance.

It is evident that the identified impacts cannot be adequately mitigated. Given the turbines' scale, height, and proximity, their presence would be overwhelming and unavoidable. Consequently, the change they would bring is fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation.

Overall, the assessment does not accurately reflect the impact's scale, the environment's sensitivity, or the interconnected nature of landscape and heritage. These shortcomings prevent a reliable evaluation and underscore the conclusion that the proposal is incompatible with the landscape's protection.

CONSTRUCTION AND POLLUTION RISKS

The application lacks crucial detail necessary for a comprehensive understanding of the environmental risks associated with construction and pollution. Significant seabed preparation and installation activities are proposed within a challenging high-energy Atlantic environment; however, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans presented. Instead, the application relies on unspecified mitigation and contingency measures that would be prepared only after consent is granted, which severely limits the ability to assess their adequacy or effectiveness at this stage.

Particularly alarming is the proposal’s failure to adequately consider the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and essential habitats that are susceptible to sediment disruption and contamination. While the application acknowledges the potential risks of sediment mobilisation and accidental chemical or oil spills, it does not sufficiently detail the preventative, control,

or monitoring measures that would be put in place to address these risks.

There is significant uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without thorough modelling and well-defined management strategies, it remains impossible to ascertain the extent, duration, or ecological consequences of these disturbances. This uncertainty extends to potential impacts on marine species and habitats, which have already been identified as sensitive within the broader assessment context.

Moreover, the absence of detailed emergency response procedures adds to the growing concerns surrounding this application. By postponing contingency planning until after consent, the proposal hinders an evaluation of whether adequate safeguards are established for responding to pollution incidents. This creates procedural risks and diminishes the capacity of the competent authority to assess the environmental protection measures before making a determination.

From a regulatory standpoint, the postponement of essential environmental safeguards is at odds with the requirements set forth by the Environmental Impact Assessment regime. It is critical that likely significant effects and mitigation strategies are assessed prior to consent; without this information, a lawful determination cannot be achieved. The application also falls short of demonstrating compliance with policy requirements related to environmental protection and water quality.

In summary, the application's deficiencies—including the lack of defined mitigation measures, the absence of detailed management plans, and uncertainties surrounding potential impacts—render the assessment materially inadequate. These issues prevent a solid evaluation of construction and pollution risks and support the conclusion that the application is fundamentally incomplete.

FISHERIES AND MARINE LIFE

The application concerning the development off the West Lewis coast reveals significant deficiencies in its assessment of fisheries and marine life, which undermines its reliability. The ecological evaluation does not adequately address the diverse marine ecosystem present in these waters, nor does it consider the active fishing industry. The failure to demonstrate how these vital uses and habitats can be protected or maintained without substantial disruption is concerning.

A notable flaw in the proposal is the assumption that fishing activities can be displaced without adverse effects. There is a lack of evidence supporting the availability, accessibility, or capacity of alternative fishing grounds to accommodate increased pressure. This absence of information is critical, as the potential for overfishing in

different areas could have broader economic implications for the local fishing fleet. Without a solid, evidence-based assessment, the repercussions on fisheries and local livelihoods remain unclear.

Moreover, the proposal poses significant risks to marine species, particularly due to the underwater noise produced during construction. The anticipated high-energy hammer piling over a prolonged period is expected to disturb a wide area, affecting species like dolphins. The predicted impact on a substantial portion of the local bottlenose dolphin population is alarming, yet the application appears to minimise these concerns without adequate supporting evidence.

The assessment contains an evident contradiction; while it acknowledges the necessity for licences to permit harm to European Protected Species, it simultaneously categorises the impacts as negligible. This inconsistency undermines the credibility of the evaluation and raises questions about adherence to the Habitats Regulations, particularly when anticipated harm necessitates legal authorisation.

Additionally, the assessment neglects to consider cumulative impacts from various pressures such as habitat disturbance, noise, and displacement of fishing activities. A thorough evaluation of these combined effects is essential to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate compliance with the National Planning Framework 4 or the National Marine Plan. It does not sufficiently show that the development can coexist with existing marine users or avoid unacceptable consequences for marine biodiversity, making it impossible to conclude that the proposal aligns with sustainable development principles.

In summary, the deficiencies regarding evidence on fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies render the assessment incomplete and untrustworthy. These shortcomings prevent an accurate evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The evaluation of the proposed onshore infrastructure is insufficient and does not adequately address the full range of impacts associated with this integrated project. The offshore turbines and the onshore developments are closely interconnected, yet their assessment has been conducted in isolation, leading to a disjointed analysis that fails to reveal the comprehensive environmental and socio-economic consequences.

The onshore components comprise cabling that crosses protected moorland, the

construction of a substation in proximity to Stornoway, and the necessary access infrastructure traversing sensitive landscapes. Excavation activities are planned in areas of deep peat, particularly within Barvas Moor, a crucial carbon store and ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, which hinders the ability to fully understand the project's environmental footprint.

By omitting or postponing the evaluation of onshore impacts, the application obstructs a proper assessment of cumulative effects. The Environmental Impact Assessment process mandates that all elements of a project be considered in unison; however, the division of offshore and onshore assessments means that the collective impacts on peatlands, habitats, and local communities are not entirely clarified.

There are significant threats to delicate habitats, including machair systems and peatland environments, which are under policy protection. The application does not sufficiently illustrate that the potential impacts on these habitats have been thoroughly evaluated or that adequate avoidance strategies have been implemented, creating a noticeable evidential gap concerning biodiversity protection.

Moreover, the infrastructure routing through operational croft land raises potential issues with existing land use and legal rights. There is a lack of evidence indicating that the requisite consents or procedures have been pursued, which casts doubt on the project's deliverability and lawful execution.

From a policy standpoint, the failure to assess the project as an entirety and to demonstrate the protection of peatlands, habitats, and land use interests stands in opposition to the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further weakens the application.

Ultimately, the division of project components, the absence of a comprehensive assessment, and the insufficiency of evidence regarding environmental and land use effects render this aspect of the application incomplete and unreliable, thereby obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal fails to adequately evaluate the potential impacts of permanent red aviation lighting, which will be visible over long distances and create a pervasive "wall of light" effect across the western horizon. This intrusion will irrevocably change the night-time environment, a crucial aspect of the West Lewis coastline, which is distinguished by its exceptionally dark skies. These dark skies are not only vital for environmental quality but also play an important role in the cultural identity of the area and its

burgeoning tourism sector, including astro-tourism.

There is a notable absence of assessment concerning the effects of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This oversight is particularly significant given how critical dark skies are to the identity of the region. Furthermore, the application does not address the impacts on nocturnal wildlife, which is a severe shortcoming. Nocturnal species, such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, exhibit sensitivity to artificial lighting, with risks of disorientation and increased collision rates. The lack of a lighting impact assessment or phototaxis study means there is no evaluation of how aviation lighting could affect these species or contribute to mortality rates.

Compounding this issue is the reliance on daytime survey data in the ornithological assessment, which inadequately captures the nocturnal activity and associated hazards. Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this risk remains unassessed. The absence of site-specific night-time data leaves a substantial gap in understanding the ecological impacts involved.

Without a thorough assessment of nocturnal effects, it is impossible to ascertain whether protected species or designated sites would be adversely impacted. The evidential standard necessary to rule out adverse effects beyond reasonable scientific doubt is not met, which invokes the precautionary principle and obstructs a lawful determination.

From a policy standpoint, this omission contravenes the National Planning Framework 4 regarding the protection of natural areas and environmental quality. Additionally, it undermines a comprehensive evaluation of landscape and seascape impacts, as the character of the night-time environment is a fundamental aspect of the overall setting.

In summary, the absence of any assessment concerning dark skies and nocturnal wildlife presents a significant evidential gap. The lack of baseline data, impact modelling, and species-specific analysis renders the application incomplete and unfit for supporting a lawful determination.

TOURISM

The proposal presents a serious deficiency in assessing tourism impacts, neglecting to evaluate the economic and social ramifications for a crucial sector of the Isle of Lewis economy. The success of tourism is inherently linked to the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. While the application recognises that 86% of visitors are motivated by the scenery, it fails to provide a

quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution.

Tourism on the island has seen substantial growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and represents up to 16% of the island's economy. Despite this growth, the application does not explore how the industrialisation of the seascape and the deterioration of environmental quality would affect Tourism Gross Value Added or the broader economic resilience of the area. In the absence of such analysis, it remains unclear whether the development would yield a net economic benefit or jeopardise a well-established and expanding sector.

Additionally, the assessment overlooks the significance of environmental quality in enhancing tourism, particularly regarding unspoiled landscapes and dark skies, which are essential for visitor experiences and emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this issue, resulting in a significant gap in understanding impacts on an acknowledged and growing component of the local economy.

Given the context of an island community with limited economic diversification, the failure to assess tourism impacts holds broader implications for employment, local enterprises, and community sustainability. The omission of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been evaluated, as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, especially concerning economic impact and the necessity to show net benefit. It also contradicts strategic objectives that classify tourism as a priority growth sector and lacks adequate evidence to enable the competent authority to evaluate the economic consequences of the proposal.

Collectively, the shortcomings in quantifying tourism impacts, assessing environmental influences on visitor behaviour, and acknowledging the island's economic dependency create a considerable evidential gap. This absence hampers a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates significant shortcomings in meeting the principles of sustainable development as outlined by statutory duties and national policy. This application mirrors the key concerns that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. It is now being put forward under a more

robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

A reliable evidential foundation for this application is notably absent. There are serious deficiencies in baseline data, the use of an undefined design envelope, unspecified mitigation measures, and the exclusion of critical impact pathways. These include nocturnal wildlife, comprehensive onshore infrastructure, and the implications for tourism. Consequently, the Environmental Impact Assessment is inadequate and fails to provide a full understanding of potential significant effects or residual impacts.

Procedural inadequacies are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the failure to share the complete Social Impact Assessment is a material omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Moreover, the proposal contradicts the National Planning Framework 4. It does not adequately protect biodiversity, natural landscapes, or cultural heritage, fails to demonstrate that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit, particularly due to the absence of tourism impact modelling. The overall assessment of cumulative impacts from both offshore and onshore elements is insufficient, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

The environmental risks associated with this proposal remain uncertain and potentially severe. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and exhibit inconsistencies. The requisite evidential standard needed to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and precluding a lawful conclusion regarding acceptable impacts.

The proposed development would lead to considerable and irreversible alterations to a sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual connections, and the adverse effects on tourism constitute permanent impacts that cannot be mitigated to an acceptable degree.

In light of these factors, the application is fundamentally and procedurally unsuitable for determination. The vast information gaps, along with policy inconsistencies and unresolved environmental risks, obstruct a lawful and evidence-based decision. The

competent authority should therefore refuse consent on these bases or invoke relevant regulatory provisions to necessitate the submission of the missing information.

It is formally requested that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Additional Comments

Windfarms are neither clean nor green. They kill wildlife of all sorts, displace sea birds, stop whales navigating. I had to leave my home because of the low frequency noise produced by nearby wind farms. At sea this affects whales & dolphins.
Wind turbines cause a lot of pollution. They are not easily recycled. I have been finding out about them for over 20 years now, the more I find out the more I realise no one is building these things because they are ‘green’, because they aren’t. They are being built because of the various subsidies, a few people get very rich while the local people & wildlife suffers.

Member of Public 217

Objection To Spiorad na Mara Offshore Wind Farm
References: MD-00011742 & MD-00011743

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The existing documentation highlights significant deficiencies in planning, environmental considerations, cultural factors, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, a region celebrated for its Atlantic-facing coastline, near-pristine natural environment, and rich cultural identity. Concerns arise regarding the compatibility of the project's scale, proximity, and design with statutory requirements, national policy, and the principles of sustainable development.

There is a lack of adequate evidential basis for a lawful determination within the application. Critical environmental data is absent, baseline information is both limited and inconsistent, and several key components of the proposal remain undefined. The application's reliance on a flexible design framework obstructs a clear understanding of potential significant effects. Furthermore, the dependency on unspecified mitigation measures means their effectiveness cannot be properly evaluated. Consequently, the documentation falls short of enabling a comprehensive or informed understanding of environmental, cultural, or community impacts, while assertions of negligible or non-significant effects lack robust evidence.

Substantial policy conflicts are evident. The proposal appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application fails to demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These conflicts directly undermine the statutory tests necessary for consent and weaken the capacity of the competent authority to determine that the development meets acceptable policy standards.

The scale of the proposed project is unprecedented in this area, with large turbines planned in close proximity to the shoreline. This raises serious concerns regarding landscape capacity, visual dominance, and environmental impact. In light of the insufficient information, the reliance on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance, it is evident that the application is

incomplete and cannot support a lawful determination. In such circumstances, it is essential that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally inadequate, failing to deliver a comprehensive, transparent, or trustworthy overview of the potential environmental repercussions of the proposal. The employment of a flexible Project Design Envelope, which lacks a commitment to precise turbine dimensions, layouts, or configurations, creates considerable uncertainty. This uncertainty hampers a consistent assessment based on worst-case scenarios, thereby compromising the integrity of the evaluation. As a result, the potential impacts outlined may not accurately represent the development that will ultimately be realised, leaving both the public and the competent authority unaware of the true magnitude of the environmental effects.

The application leans significantly on mitigation strategies, monitoring plans, and management approaches that remain undefined. Consent is being sought under the assumption that any environmental damage will be addressed later, which hinders any substantial evaluation of the effectiveness of these measures or an assessment of residual impacts. This postponement of crucial information until after consent is granted is procedurally unacceptable and contradicts the essential aims of the Environmental Impact Assessment process, which mandates that significant potential effects and mitigation measures should be clearly established before any determination can be made.

There are also marked evidential shortcomings, encompassing gaps in baseline data, methodological limitations, and a reliance on assumptions rather than specific site-related evidence. This leads to uncertainties regarding both the scale and significance of the impacts, particularly where conclusions suggest negligible or non-significant effects without robust supporting information. The lack of adequate data obstructs a clear comprehension of cumulative and worst-case impacts, introducing scientific uncertainties that cannot be reconciled with statutory obligations.

Consequently, the application does not satisfy the evidential standards outlined in the Habitats Regulations, which necessitate the exclusion of adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal falls short of demonstrating alignment with the National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it is not possible to confirm that impacts have been thoroughly evaluated or that suitable safeguards have been established.

Overall, the dependence on an unspecified design envelope, the lack of defined mitigation strategies, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies prevent a lawful and rigorous assessment of environmental effects, resulting in the competent authority being unable to make an informed decision based on the information presented.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species lacks the necessary detail and reliability to understand ecological receptors in the West Lewis coastal environment, which is a biologically active and highly sensitive marine system. The baseline data provided is incomplete, and the methodologies used do not effectively capture the presence, behaviour, and habitat use of local species. Consequently, the assessment fails to establish a sound evidential basis for evaluating impacts.

A significant shortcoming is the inadequate recognition and assessment of otters, a European Protected Species, and their active use of coastal areas for foraging and movement. The absence of an analysis of their core foraging range and behavioural patterns means that the potential effects of construction disturbances, noise, and increased activity have not been thoroughly evaluated. This gap undermines conclusions regarding the absence of significant effects on this species.

Further shortcomings are evident in the assessment of basking sharks, where reliance on aerial surveys introduces a considerable detection bias, particularly in Atlantic conditions. This methodology is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that indicate frequent use of these waters. The failure to incorporate or adequately consider such data leads to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological flaws result in conclusions regarding negligible or non-significant effects that are grounded in assumptions rather than robust evidence. The lack of adequate baseline data also obstructs meaningful assessments of cumulative and indirect impacts, including seasonal variation and broader ecosystem interactions. This introduces uncertainty about the true scale of risk faced by marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. The uncertainty that arises prohibits the exclusion of adverse effects beyond reasonable scientific doubt, thus

invoking the precautionary principle. In light of these circumstances, consent cannot be lawfully granted.

Collectively, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These shortcomings hinder a robust evaluation of impacts on marine ecology and protected species, reinforcing the overall conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development on the west coast of the Isle of Lewis is critically flawed, exhibiting substantial gaps in evidence and internal contradictions that undermine its findings. This area is home to internationally significant seabird populations, many of which are already in decline. However, the application fails to adequately demonstrate that these species will not be negatively impacted. The development is situated within key foraging areas and migratory routes, yet the assessment does not thoroughly consider the risks of displacement, collision, or habitat loss.

A major inconsistency arises within the application, as the developer claims there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is typically necessary only when significant harm is anticipated. This contradiction raises serious doubts about the credibility of the assessment and suggests that its conclusions lack support from the underlying evidence.

Furthermore, the assessment does not sufficiently establish that seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. The critical importance of these feeding grounds is insufficiently addressed, and reliance on modelling approaches introduces uncertainty, particularly concerning species like Kittiwakes and Fulmars that are in severe decline. The methodologies used are likely to underestimate mortality rates, particularly due to incomplete baseline data and an inadequate understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor poses an additional and significant risk by effectively obstructing a primary flight path for species migrating between the United Kingdom and Iceland. The application lacks a thorough assessment of the long-term consequences of sustained mortality in this corridor and its potential impacts on species with relatively small global populations.

Regulatory scrutiny reveals that the application does not satisfy the evidential requirements necessary to conclude that there will be no adverse effect on the integrity

of protected sites. The presence of contradictory findings, along with gaps in data and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This situation invokes the precautionary principle, thereby obstructing a lawful conclusion in favour of consent.

Overall, the identified deficiencies reflect a failure to adhere to National Planning Framework 4 concerning biodiversity protection and the preservation of natural assets. The inability to prove that internationally important seabird populations will not face adverse effects places the proposal in direct opposition to national policy. Collectively, these factors render the assessment unreliable, characterised by internal inconsistencies, methodological flaws, and a lack of sufficient evidence. Such shortcomings inhibit a thorough evaluation of impacts and lead to the conclusion that the application fails to meet the statutory requirements needed for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment provided for the proposed development overlooks vital aspects of cultural heritage and community identity, particularly in relation to the West Lewis coastline. This area embodies a living cultural landscape where the environment, language, tradition, and community are interconnected. Instead of recognising these dynamic relationships, the application reduces heritage to a collection of static assets, neglecting their ongoing social, cultural, and spiritual significance within the community.

A significant shortcoming in the assessment is its treatment of culturally important sites such as the cemeteries located at Dalmore, Bragar, and Barvas. These cemeteries serve as active sites of burial and spiritual practice, yet they are presented as static features, disregarding their continued use and the implications of development on their surroundings. This misrepresentation leads to an inadequate evaluation of cultural effects and overlooks the role these sites play in community life.

Moreover, the application does not address intangible cultural heritage, which includes the Gaelic language, local traditions, and the longstanding relationship that the community has with the coastal environment. These elements are critical to the area's identity but are completely missing from the assessment, indicating a significant oversight. Without acknowledging these factors, the full cultural impact of the development remains obscured.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity, recognised under the characteristics of an Indigenous People, yet the process of Free, Prior and Informed Consent has not been

followed. This lack of meaningful engagement calls into question the validity of the assessment and does not adhere to established principles for participation in matters that affect cultural and environmental interests.

Additionally, there is a critical procedural flaw due to the absence of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligations to evaluate the social, cultural, and economic impacts on the island community, which prevents a lawful determination of the application.

From a policy standpoint, these oversights create direct conflict with the National Planning Framework 4, particularly regarding the safeguarding of historic assets and places. The failure to consider both tangible and intangible heritage, and the recognition of living cultural practices, represents a clear deviation from policy requirements.

In summary, the failure to adequately assess living heritage, intangible cultural values, community rights, and the necessary statutory obligations results in a substantial evidential gap. The cultural impacts of the development have not been thoroughly evaluated, and the application fails to establish a solid foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development raises significant concerns regarding the adequacy of the assessment of social impacts, health, and wellbeing. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents; however, the full report remains unpublished. This lack of transparency creates a substantial evidential gap, hindering both public understanding and the competent authority's ability to evaluate the full scope of social risks identified by the developer’s own research.

Residents are already experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement, indicating they are not speculative in nature. Nonetheless, the absence of the full assessment restricts proper scrutiny of the findings and diminishes the opportunity to ascertain their significance in the decision-making process.

Moreover, evidence suggests that the proposal is viewed as a threat to community identity and cohesion, with “cultural loss” highlighted in the developer’s findings. Despite this acknowledgement, such impacts have not been adequately addressed within the main application or assigned appropriate importance. The withholding of the complete Social Impact Assessment thus obscures the genuine human and social

costs associated with the development.

This deficiency of transparency severely undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly when community character and functioning are at stake. The application fails to present a complete evidential basis necessary for assessing the balance between benefits and harm due to the lack of the full dataset.

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4 regarding health and wellbeing. Developments must promote positive health outcomes and avoid adverse effects; however, the available evidence points to existing negative impacts that have not been fully revealed. Without access to the full assessment, compliance with this policy remains unproven.

The procedural ramifications are substantial. The competent authority is unable to conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This represents a significant omission in the application and fails to satisfy the evidential standards set by the Environmental Impact Assessment regime.

In summary, the combination of the non-disclosure of the full Social Impact Assessment and evidence of current adverse impacts renders the assessment incomplete and unreliable. This situation prevents a lawful determination and underscores the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of impacts on seascape, landscape, and visual aspects is significantly lacking and does not appropriately capture the extent of change or the sensitivity of the environment. The coastline of West Lewis features an open Atlantic horizon, an undeveloped character, and a pronounced sense of remoteness. The introduction of large turbines close to the shore would create a persistent industrial presence, fundamentally changing this character and resulting in an irreversible transformation of the landscape.

The visual change has not been adequately represented in the application. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, which would diminish visual amenity and compromise the qualities of naturalness and remoteness. The assessment does not adequately convey the level of impact or its significance within such a sensitive landscape context.

Concerns arise regarding the selection and presentation of visual viewpoints. Evidence indicates that some viewpoints may fail to represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and valued landscapes. This raises the possibility that the visual impact magnitude has been underestimated, compromising the assessment's reliability.

There is also a failure to evaluate the interconnected nature of landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape context linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as separate entities rather than acknowledging their interdependence, resulting in an incomplete understanding of impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and their connection to the natural horizon. This signifies not just a visual impact but also a more extensive cultural and spatial detriment that has not been adequately assessed in the application.

From a policy viewpoint, the proposal directly contradicts National Planning Framework 4 regarding the safeguarding of natural areas and historic assets. The proposed changes are incompatible with the requirement to protect landscape character, visual amenity, and the settings of culturally significant sites. Additionally, the lack of a thorough worst-case assessment further weakens any assertion of policy adherence.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. Consequently, the change is fundamental and permanent, incapable of being reduced to an acceptable level through mitigation.

Overall, the assessment does not accurately represent the magnitude of impact, the sensitivity of the environment, or the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and support the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal involves significant seabed preparation and installation works within a high-energy Atlantic environment, yet the assessment of construction and pollution risks is inadequate. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans, leading the application to depend on mitigation and contingency measures that are to be prepared after consent. This lack of

detail obstructs a meaningful assessment of their adequacy or effectiveness.

The sensitivity of the receiving environment raises further concerns. The West Lewis coastline features clean coastal waters and crucial habitats that are vulnerable to both sediment disturbance and contamination. While the application recognises risks such as sediment mobilisation and accidental spills of chemicals or oil, it fails to provide sufficient detail on prevention, control, or monitoring measures for these risks.

Additionally, uncertainty surrounds the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without solid modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts, especially on marine species and habitats identified as sensitive in the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. The deferral of contingency planning to a post-consent stage hinders the evaluation of whether adequate safeguards are in place for responding to pollution events. This situation introduces procedural risk and undermines the competent authority's ability to assess environmental protection measures during the decision-making process.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and necessary mitigations must be evaluated prior to consent, and without this information, a lawful determination cannot be achieved. The application also does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the lack of defined mitigation measures, absence of detailed management plans, and uncertainty regarding potential impacts render the assessment materially deficient. These deficiencies obstruct a robust evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents a concerning lack of evidence regarding the potential displacement of fishing activity. It assumes that such displacement can occur without negative consequences, yet it fails to establish whether alternative fishing grounds are available, accessible, or capable of accommodating the increased pressure. This oversight is critical, as the risk of overfishing in other areas poses a threat not only to marine life but also to the economic stability of the local fishing fleet. The implications for fisheries and livelihoods remain inadequately addressed, leaving serious questions about the long-term sustainability of these practices.

Moreover, the risks posed to marine species, particularly from underwater noise during construction, are alarmingly understated. The use of high-energy hammer piling is anticipated to generate disturbances over considerable distances, which may adversely affect species such as dolphins. The anticipated impact on a significant portion of the local bottlenose dolphin population raises profound concerns, yet the application minimizes these effects without providing compelling supporting evidence.

There is a notable inconsistency within the application itself, where it acknowledges the need for licences to permit harm to European Protected Species, while simultaneously asserting that the impacts are negligible. This contradiction not only undermines the credibility of the assessment but also raises significant doubts about compliance with the Habitats Regulations, particularly in scenarios where anticipated harm would necessitate legal authorisation.

Additionally, the assessment does not adequately address the cumulative impacts arising from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these interconnected effects, it is impossible to gauge the overall impact on marine ecosystems and socio-economic conditions effectively.

From a policy standpoint, the application fails to demonstrate alignment with the National Planning Framework 4 or the National Marine Plan. It does not provide sufficient evidence that the development can coexist harmoniously with current marine users or that it can avert unacceptable impacts on marine biodiversity, which are essential for concluding that the proposal aligns with the principles of sustainable development.

In summary, the glaring deficiencies regarding fishing displacement, the minimisation of acoustic impacts, and the internal contradictions within the application render the assessment both incomplete and unreliable. These issues critically hinder any reliable evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal involves the development of onshore infrastructure linked to offshore turbines. However, the assessment of these onshore elements is materially incomplete, failing to consider the integrated nature of the project and its full environmental and socio-economic impacts. The cabling across protected moorland, the construction of a substation near Stornoway, and the associated access infrastructure traverse sensitive landscapes and involve excavation in areas of deep peat, notably within Barvas Moor, which serves as a significant carbon store and ecologically sensitive habitat. The

current application does not offer a thorough evaluation of these impacts, limiting the understanding of the project's overall environmental footprint.

By omitting or delaying the assessment of onshore impacts, the application undermines the ability to evaluate cumulative effects effectively. The Environmental Impact Assessment process stipulates that all components of a project should be assessed together. However, the distinct separation of onshore and offshore elements obscures the combined impacts on peatlands, habitats, and local communities.

Significant risks remain for sensitive habitats, including machair systems and peatland environments, which are protected under policy. The application fails to illustrate that the impacts on these habitats have been thoroughly evaluated or that appropriate avoidance measures have been implemented, resulting in a clear evidential gap regarding biodiversity protection.

Concerns also arise regarding the carbon balance associated with the proposal. Disturbances to peatland could release stored carbon, potentially incurring a carbon debt that contradicts the goals of renewable energy initiatives. The application does not sufficiently address this matter or demonstrate that the overall carbon balance is advantageous.

Furthermore, the routing of infrastructure through active croft land introduces possible conflicts with existing land use and legal rights. There is a lack of evidence that necessary consents or processes have been initiated, which raises doubts about the deliverability and legality of the project.

From a policy standpoint, the failure to evaluate the project in its entirety and to demonstrate adequate protection for peatlands, habitats, and land use interests stands in conflict with both the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated weakens the application.

In summary, the separation of the project's components, the lack of a comprehensive assessment, and insufficient evidence regarding environmental and land use impacts render this part of the application incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment lacks an assessment of dark skies and nocturnal wildlife, which constitutes a significant omission. The coastline of West Lewis is characterised by its exceptionally dark skies, integral to the area's environmental quality, cultural identity, and tourism appeal. The proposed introduction of permanent

red aviation lighting, which would be visible over extensive distances, is anticipated to create a continuous and intrusive "wall of light" across the western horizon, fundamentally altering the night-time environment.

There is no consideration of how this lighting may impact visual amenity, landscape character, or the experiences of residents and visitors. This is particularly significant given the critical role of dark skies in the local identity and the growing sectors of astro-tourism. The failure to evaluate these impacts highlights a considerable gap in the overall assessment of the landscape and environment.

Equally concerning is the absence of an evaluation concerning nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel exhibit a high sensitivity to artificial lighting due to phototaxis, which can result in disorientation and an increased risk of collision. The application lacks any lighting impact assessment or phototaxis study, failing to address how the proposed aviation lighting could affect these species or contribute to increased mortality rates.

This shortfall is exacerbated by the reliance on daytime survey data within the ornithological assessment, which does not adequately capture nocturnal activity or associated risks. For instance, Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this risk has not been evaluated. The failure to provide site-specific night-time data creates a crucial gap in the understanding of ecological impacts.

Without a thorough assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites might face adverse effects. The evidential standard needed to exclude adverse effects beyond reasonable scientific doubt remains unfulfilled, necessitating the application of the precautionary principle and precluding a lawful determination.

From a policy standpoint, these omissions contravene the National Planning Framework 4 in terms of protecting natural environments and ensuring environmental quality. Furthermore, this lack of assessment undermines the comprehensive evaluation of landscape and seascape impacts, given that the character of the night-time environment is a vital aspect of the overall ecosystem.

In summary, the failure to assess dark skies and nocturnal wildlife creates a substantial evidential gap. The application is incomplete, lacking essential baseline data, impact modelling, and species-specific analyses, rendering it inadequate for supporting a lawful determination.

TOURISM

The application presents a materially deficient assessment regarding the impacts on tourism, failing to evaluate the economic and social ramifications for a crucial sector of the Isle of Lewis economy. The tourism industry relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and its sense of remoteness. While it is acknowledged that 86% of visitors are attracted by the scenery, the assessment lacks a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism has seen significant growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and constitutes up to 16% of the island's economy. However, the application does not model the potential effects of seascape industrialisation and the loss of environmental quality on Tourism Gross Value Added or the broader economic resilience of the area. Without such crucial analysis, it remains impossible to ascertain whether the proposed development would yield a net economic benefit or detract from an established and burgeoning sector.

Moreover, the assessment inadequately considers the role of environmental quality in underpinning tourism, notably the value of unspoiled landscapes and dark skies to the visitor experience, as well as to emerging sectors such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortcoming, creating a significant gap in understanding the impacts on this recognised and expanding aspect of the local economy.

Given the context of an island community with limited economic diversification, the neglect of tourism impacts bears broader implications for employment, local businesses, and the sustainability of the community. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been appropriately evaluated as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not illustrate compliance with National Planning Framework 4, particularly concerning economic impact and the necessary demonstration of net benefit. It also stands in contradiction to strategic objectives that highlight tourism as a priority growth sector, lacking sufficient evidence to enable the competent authority to assess the economic consequences of the proposal adequately.

In summation, the failure to quantify tourism impacts, evaluate environmental drivers of visitor behaviour, and consider the island's economic dependency leads to a significant

evidential gap. This hinders a thorough evaluation of the economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the requirements for sustainable development when considered against national policy, statutory duties, and evidential standards. This application mirrors the key issues that led to the rejection of the Lewis Wind Power proposal in 2008. At that time, the level of industrialisation was deemed unacceptable. Now, the application is being assessed under a more rigorous policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant deficiencies in the evidence provided for this application. It lacks a comprehensive and reliable evidential basis for determination. Notable gaps in baseline data exist, and the use of an undefined design envelope is concerning. Furthermore, the reliance on unspecified mitigation measures and the omission of critical impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism, leave the Environmental Impact Assessment incomplete. This inadequacy hampers a full understanding of likely significant effects or residual impacts.

Procedural failures are evident as well. The absence of a compliant Island Communities Impact Assessment is a breach of statutory duty under the Islands (Scotland) Act 2018. Additionally, the failure to disclose the complete Social Impact Assessment represents a significant omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

This proposal contradicts the objectives set out in National Planning Framework 4. It does not adequately protect biodiversity, natural places, or cultural heritage. Furthermore, it fails to demonstrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, primarily due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been properly assessed, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. The assessments of marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The necessary evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful conclusion that impacts are acceptable.

Additionally, the proposal would cause substantial and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruptions to cultural and visual relationships, and negative impacts on tourism are permanent effects that cannot be mitigated to an acceptable level.

In summary, the application is procedurally and substantively unsuitable for determination. The extensive information deficiencies, combined with conflicts with policy and unresolved environmental risks, impede a lawful and evidence-based decision. The competent authority is urged to refuse consent on these grounds or to invoke the relevant regulatory provisions to request the missing information.

Therefore, it is formally requested that the application for the Spiorad na Mara Offshore Wind Farm is entirely refused.

Additional Comments

This will destroy this island and sea life! To make electricity to send to England! With one of the highest electricity cost for our homes in UK. And 55% of the population in fuel poverty, 65%of those in extreme fuel poverty! Too much! What about the future of the children here! This is not green energy it’s greed!

Member of Public 218

Objection To Spiorad na Mara Offshore Wind Farm
References: MD-00011742 & MD-00011743

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection is informed by a thorough review of the Environmental Impact Assessment Report and accompanying documentation, revealing significant deficiencies in planning, environmental considerations, cultural impacts, and procedural compliance. The development is situated off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

The unprecedented scale of the proposal introduces large turbines positioned in close proximity to the shoreline, raising substantial concerns regarding landscape capacity, visual impact, and environmental consequences. The application lacks a sufficient evidential foundation necessary for a lawful determination. It is characterised by missing critical environmental data, limited and inconsistent baseline information, and undefined key aspects of the proposal. The flexible design framework employed results in an inability to fully understand the likely significant effects of the development. Furthermore, the reliance on unspecified mitigation measures means that their potential effectiveness cannot be evaluated. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, undermining claims of negligible or non-significant effects due to lack of robust supporting evidence.

The proposal also exhibits clear and substantive conflicts with established policy. It appears misaligned with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. The application does not adequately demonstrate that it can meet national obligations for the protection of biodiversity, climate interests, and environmental integrity. These discrepancies directly challenge the statutory tests required for consent and hinder the competent authority's ability to deem the development acceptable in policy terms.

In light of these issues—insufficient information, undefined mitigation strategies, evidential shortcomings, and clear non-compliance with policy—the application is deemed incomplete and incapable of supporting a lawful determination. Therefore, the precautionary principle should be invoked in response to these concerns.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies that compromise its reliability and transparency regarding the environmental effects of the proposed development. A major concern is the employment of a flexible Project Design Envelope, which lacks fixed turbine dimensions, layouts, or configurations. This uncertainty hinders the ability to consistently apply a worst-case scenario, thus undermining the integrity of the assessment. Consequently, the impacts reported may not accurately reflect those of the actual development, limiting both public understanding and the competent authority's ability to gauge the true extent of environmental effects.

Additionally, the application depends extensively on unspecified mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent under these circumstances implies that any environmental harm will be addressed subsequently, obstructing a thorough evaluation of their effectiveness or the assessment of any residual impacts. This postponement of critical information until after consent is granted is procedurally unacceptable, as it contradicts the Environmental Impact Assessment regime's requirement for significant effects and mitigation to be clearly established prior to determination.

There are also noteworthy evidential gaps, including insufficient baseline data and methodological limitations, leading to an overreliance on assumptions rather than site-specific evidence. Such shortcomings create uncertainty about the magnitude and significance of impacts, especially when conclusions of negligible or non-significant effects are drawn without adequate supporting data. The lack of robust information compromises the understanding of cumulative and worst-case impacts, thereby introducing scientific uncertainty that does not align with statutory requirements.

Due to these issues, the application does not satisfy the evidential standard mandated by the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate adherence to National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it cannot prove that impacts have been thoroughly assessed or that suitable safeguards are in place.

In summary, the reliance on an ill-defined design envelope, the absence of clearly specified mitigation, and the gaps in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies obstruct a lawful and thorough assessment of environmental effects,

leaving the competent authority unable to make an informed determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The inadequacy of the assessment of alternatives is significant and does not fulfil the statutory requirements of the Environmental Impact Assessment regime. Rather than offering a structured and reasoned comparison of feasible alternatives based on environmental effects, the application presents a narrative that details the evolution of the project. This method fails to illustrate that less harmful options have been thoroughly identified, evaluated, and chosen over more damaging solutions.

There is an absence of transparent, evidence-based comparisons of alternative offshore locations, development scales, or design configurations. Notably, the application does not indicate that the developer has genuinely considered placing turbines further offshore, where the visual, ecological, and coastal impacts are likely to be less severe. Given the sensitivity of the West Lewis coastline and the critical role of proximity to shore in determining impact, the lack of such an analysis means that one cannot conclude that the proposed siting is the least damaging option.

These deficiencies also extend to the assessment of cable routing and landfall, with insufficient evidence that alternative routes have been adequately explored to avoid or minimise effects on sensitive receptors, including areas of cultural and spiritual significance like Barvas Cemetery. The failure to present a clear avoidance strategy and the absence of comparative analysis suggest that mitigation by design has not been implemented, relying instead on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This represents a failure to adhere to the established mitigation hierarchy, preventing the competent authority from determining whether less harmful and more suitable alternatives are available. Without a thorough alternatives assessment, it cannot be concluded that the proposal aligns with sustainable or policy-compliant solutions.

From a policy standpoint, this inadequacy undermines compliance with National Planning Framework 4, particularly regarding the protection of natural places, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment constitutes a material omission that contributes to the overall conclusion that the application has not been properly evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species presents significant deficiencies, leading to a lack of reliable understanding of the ecological receptors present in the West Lewis coastal environment. This area is characterised by high biological activity and sensitivity. However, the methodologies employed in the assessment fail to adequately document species presence, behaviour, and habitat use, resulting in an incomplete dataset that undermines the evaluation of potential impacts.

One major shortcoming is the inadequate consideration of otters, a species protected under European law. The application does not properly identify or assess their active use of coastal areas, crucial for foraging and movement. By neglecting their core foraging range and behaviour, the potential impacts of construction disturbance, noise, and increased human activity are not sufficiently evaluated. This gap significantly undermines any claims about the absence of significant effects on otters.

Moreover, the assessment of basking sharks is similarly flawed. The reliance on aerial surveys introduces a considerable risk of detection bias, particularly under Atlantic conditions, which may lead to an underestimation of their presence in these waters. Established land-based observations indicate that these waters are frequently utilised by basking sharks, yet such relevant data has not been appropriately integrated into the assessment, resulting in an incomplete baseline that further weakens the overall conclusions.

These methodological shortcomings mean that the conclusions suggesting negligible or non-significant effects rely more on assumptions than on robust evidence. The lack of adequate baseline data hampers the ability to conduct meaningful assessments of cumulative and indirect impacts, including variations by season and interactions within the wider ecosystem. Consequently, there is considerable uncertainty regarding the actual risks to marine species and habitats.

From a regulatory standpoint, the application falls short of the Environmental Impact Assessment requirements and the National Planning Framework 4, primarily due to the inadequate identification and assessment of protected species. The degree of uncertainty involved prevents the dismissal of potential adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these issues, granting consent would not be lawful.

In summary, the assessment's unreliable nature stems from incomplete baseline data, flawed methodologies, and conclusions lacking adequate support. These deficiencies hinder a robust evaluation of impacts on marine ecology and protected species, culminating in the conclusion that the application is devoid of a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the ornithological impact is fundamentally flawed and presents significant inconsistencies and gaps in evidence that seriously undermine its findings. The development site is situated within crucial foraging areas and migratory corridors on the west coast of the Isle of Lewis, which hosts internationally significant seabird populations that are already in decline. However, the application does not adequately demonstrate that these species will not be adversely affected, failing to meet the required evidential standards.

Moreover, the application contains a fundamental contradiction; it asserts that there will be no significant adverse effects, while simultaneously proposing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment and suggests that the conclusions drawn are not underpinned by the necessary evidence.

The assessment falls short in demonstrating that seabirds associated with protected areas such as the Lewis Peatlands and St Kilda will be unaffected. The significance of these feeding grounds is inadequately considered, and the reliance on modelling techniques introduces uncertainty, particularly for species like Kittiwakes and Fulmars that are already facing severe declines. The methodologies utilised are likely to underestimate mortality rates, especially given the lack of comprehensive baseline data and an incomplete understanding of behavioural responses.

The placement of turbines within a known migratory corridor poses an additional risk, effectively creating a barrier in a primary flight path used by migratory species travelling between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor and its potential impacts on species with limited global populations have not been adequately assessed.

From a regulatory standpoint, the application does not fulfil the evidential threshold necessary to ascertain that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, along with gaps in data and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been reached. This invokes the precautionary principle, which prevents a lawful conclusion in favour of consent.

The identified deficiencies also represent non-compliance with the National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to prove that internationally important seabird populations will not be

adversely affected places the proposal in direct conflict with national policy.

In conclusion, the assessment lacks reliability due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. These shortcomings hinder a thorough evaluation of impacts and lead to the overall determination that the application fails to meet the statutory requirements essential for its approval.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the cultural heritage along the West Lewis coastline is severely lacking and does not recognise this area as a vibrant cultural landscape. Here, environment, language, tradition, and community are deeply intertwined. Instead of acknowledging these connections, the application adopts a simplistic view, treating heritage merely as isolated, static assets without acknowledging their active social, cultural, and spiritual significance within the community.

Particularly troubling is the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are active burial sites and places of spiritual practice, yet they are mischaracterised as static features in the assessment. This oversight neglects their ongoing use, meaning, and the implications of development on their settings. Consequently, the evaluation of cultural impacts remains incomplete, overlooking the vital role these sites play in community life.

Moreover, the assessment fails to consider intangible cultural heritage, including the Gaelic language, local traditions, and the long-standing relationship that the community has with the coastal environment. These elements are essential to the region's identity yet are entirely omitted from the assessment, constituting a significant gap. Without recognising these crucial factors, it is impossible to accurately gauge the cultural impact of the proposed development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population possesses a unique cultural identity recognised as characteristic of Indigenous Peoples; however, there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the legitimacy of the assessment and neglects the established principles for participation in decisions affecting cultural and environmental interests.

A major procedural failure in this context is the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The absence of this assessment prevents the competent authority from meeting its legal obligations to evaluate the social, cultural, and economic impacts on the island community, rendering the determination unlawful.

From a policy standpoint, these deficiencies directly contravene the National Planning Framework 4, especially concerning the protection of historic assets and places. The disregard for both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, clearly diverges from policy requirements.

In summary, the combined failures to assess living heritage, intangible cultural values, community rights, and statutory obligations create a significant evidential gap. The cultural impacts of the proposed development have not been adequately evaluated, and the application fails to provide a solid foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal raises significant concerns regarding social impacts, health, and wellbeing, primarily due to the material deficiency in the assessment and the lack of transparency surrounding it. Although a Social Impact Assessment was commissioned by the developer, which included focus groups with local residents, the absence of the full report creates a substantial evidential gap. This gap restricts both public scrutiny and the competent authority's ability to fully grasp the social risks that have been identified through the developer's own research.

Available summaries highlight that residents are currently enduring measurable stress, anxiety, and concern as a direct result of the scale and proximity of the proposed development. These effects stem from direct engagement with the community, making them grounded in reality rather than speculation. However, without access to the complete assessment, the significance of these findings cannot be accurately determined within the decision-making process.

Moreover, there are indications that the proposal is viewed as a threat to community identity and cohesion, with "cultural loss" specifically noted in the developer's findings. Unfortunately, these impacts have not been adequately integrated into the main application, nor have they been accorded the necessary weight in the evaluation process. The failure to disclose the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

This lack of transparency further undermines the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health ramifications is vital for developments of this nature, especially where the character and functioning of the community may be at risk. The omission of the complete dataset hampers the application's ability to present a comprehensive evidential basis for weighing the benefits against the harm.

From a policy standpoint, the application falls short in demonstrating adherence to the National Planning Framework 4 concerning health and wellbeing. Developments must encourage positive health outcomes and avoid causing harm, yet the evidence that is currently available indicates existing adverse effects that have not been fully revealed. Therefore, it is impossible to ascertain compliance with this policy without the full assessment.

The procedural implications of this situation are significant. The competent authority is unable to conduct a thorough socio-economic and health evaluation in the absence of the full Social Impact Assessment. This represents a material omission within the application and a clear failure to meet the evidential standards required by the Environmental Impact Assessment regime.

In summary, the failure to disclose the complete Social Impact Assessment, when combined with the evidence of existing adverse impacts, renders the assessment not only incomplete but also unreliable. This lack of sufficient information ultimately obstructs a lawful determination regarding the application.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of the visual impacts, seascape, and landscape is insufficient and does not properly account for the significant changes or the sensitivity of the environment. The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and profound sense of remoteness. The proposed large-scale turbines situated near the shoreline would introduce a pervasive industrial presence, drastically changing this character and leading to an irreversible transformation of the landscape.

The application fails to accurately depict the extent of this visual alteration. Due to the scale and proximity of the turbines, they would dominate sightlines from residential areas, historic landmarks, and popular coastal spots. This would have a direct effect on visual amenity and diminish the essential qualities of naturalness and remoteness. The evaluation does not adequately express the significance of this impact within the context of such a delicate landscape.

Moreover, there are concerns regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that the viewpoints chosen may not fully represent the most sensitive receptors or the most adverse scenarios, especially concerning important cultural heritage sites and landscapes of high value. This raises the possibility that the severity of visual impact has been understated, which compromises the reliability of the assessment.

An additional shortcoming is the neglect to evaluate the interconnected relationship between the landscape, seascape, and cultural heritage. Key sites like the Calanais Standing Stones and other Scheduled Monuments form part of a broader landscape context, linked through visual and spatial connections to the Atlantic horizon. The assessment treats these as separate entities rather than acknowledging their interrelation, leading to a partial understanding of the impacts on their cultural significance and setting.

The industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are experienced and severing their link to the natural horizon. This not only constitutes a visual impact but also a broader cultural and spatial detriment that has not been thoroughly assessed in the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4 regarding the protection of natural areas and historical assets. The magnitude of change is incompatible with the obligation to preserve landscape character, visual amenity, and the settings of culturally significant locations. The lack of a comprehensive worst-case assessment further undermines any assertion of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be both dominant and inescapable. Consequently, the resulting alteration is fundamental and permanent, rather than something that can be reduced to an acceptable level through mitigation efforts.

In summary, the assessment does not accurately portray the extent of impact, the environment's sensitivity, or the interconnectedness of landscape and heritage. These shortcomings hinder a dependable evaluation and reinforce the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal is fundamentally flawed due to an incomplete assessment of construction and pollution risks, which lacks the necessary detail to evaluate the likely environmental effects. The West Lewis coastline, characterised by clean coastal waters and significant habitats, is particularly sensitive to disturbances, yet the application does not provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are to be devised after consent, obstructing a meaningful assessment of their adequacy and effectiveness.

Concerns are amplified by the application's acknowledgment of risks such as sediment mobilisation and accidental spills of chemicals or oil, yet it fails to detail how these will be prevented, controlled, or monitored. This reliance on undefined future measures is particularly troubling given the environmental sensitivities involved. Furthermore, there remains considerable uncertainty regarding the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. Without rigorous modelling and well-defined management strategies, the potential extent, duration, or ecological effects of these impacts cannot be established, leaving the effects on sensitive marine species and habitats inadequately addressed.

Additionally, the absence of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning until after consent is granted, the application effectively undermines the assessment of whether adequate safeguards are in place to address potential pollution events. This introduces significant procedural risks, hindering the competent authority's ability to evaluate the proposed environmental protection measures at the point of determination.

From a regulatory standpoint, the deferment of essential environmental safeguards is in direct conflict with the requirements of the Environmental Impact Assessment regime. It is mandated that likely significant effects and mitigation be assessed prior to consent, and the absence of this critical information renders a lawful determination impossible. The application fails to demonstrate compliance with policy requirements related to environmental protection and water quality.

In summary, the lack of defined mitigation measures, detailed management plans, and clarity regarding potential impacts culminate in a materially deficient assessment. These deficiencies obstruct a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposed development presents significant concerns regarding its assessment of fisheries and marine life, which is inadequate and fails to offer a thorough evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and support an active fishing industry. However, the application does not adequately demonstrate how these vital uses and habitats can be preserved or maintained without experiencing considerable disruption.

A major issue arises from the presumption that fishing activities can be relocated without repercussions. There is no evidence provided to suggest that alternative fishing grounds are available or suitable to absorb the additional pressure that would result from this displacement. This lack of information is critical, as the risk of overfishing in

other areas is heightened, potentially leading to wider economic repercussions for the local fishing fleet. The absence of a clear and evidence-backed assessment obscures the understanding of impacts on both fisheries and local livelihoods.

Moreover, the proposal poses significant risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over a prolonged period is likely to create disturbances that reach large distances, which may adversely affect species such as dolphins. The predicted disruption to a considerable portion of the local bottlenose dolphin population raises profound concerns, yet the application downplays these effects without providing sufficient supporting evidence.

Additionally, the application exhibits a notable inconsistency by acknowledging the requirement for licences to permit harm to European Protected Species, while simultaneously claiming that such impacts are negligible. This contradiction undermines the credibility of the assessment and raises doubts regarding compliance with the Habitats Regulations, particularly where anticipated harm necessitates legal authorisation.

The assessment also neglects to consider the cumulative impacts from multiple stressors, including habitat disruption, noise, and the displacement of fishing activities. Without a comprehensive evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It fails to establish that the development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity, hindering any conclusion that this proposal embodies sustainable development.

In summary, the deficiencies in evidence concerning fishing displacement, the underestimation of acoustic impacts, and the internal contradictions lead to an assessment that is incomplete and unreliable. These issues impede a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is significantly lacking, failing to address the full range of impacts associated with this integrated project. The onshore works, including the construction of a substation near Stornoway and cabling across protected moorland, are fundamentally connected to the offshore turbines; however, they are treated separately in the evaluation. This fragmented approach obscures the true

environmental and socio-economic effects.

The proposed works entail excavation in areas of deep peat, particularly within Barvas Moor, which is an ecologically sensitive habitat and a vital carbon store. The application does not deliver a thorough assessment of these impacts, hindering a complete understanding of the project's environmental footprint.

By deferring the assessment of onshore impacts, the application fails to facilitate a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be reviewed together. The division between offshore and onshore elements results in a lack of clarity regarding the combined impacts on habitats, peatlands, and local communities.

There are notable risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application does not prove that these habitats have been fully assessed or that appropriate avoidance measures have been taken, which highlights a significant gap in biodiversity protection.

Concerns also arise regarding the carbon balance, as disturbing peatland can release stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy initiatives. The application inadequately addresses this concern or shows that the overall carbon balance is beneficial.

Additionally, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application lacks evidence that the required consents or processes have been initiated, prompting doubts about its deliverability and lawful implementation.

From a policy standpoint, the failure to assess the project as a cohesive whole, along with the insufficient demonstration of protection for peatlands, habitats, and land use interests, is in conflict with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further weakens the application.

In conclusion, the separation of the project's components, the absence of a comprehensive assessment, and the lack of evidence concerning environmental and land use impacts leave this portion of the application incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding dark skies and nocturnal wildlife represents a significant gap in the Environmental Impact Assessment. The West Lewis coastline is noted for its exceptionally dark skies, which are crucial for environmental quality, cultural identity, and the tourism sector. The introduction of permanent red aviation lighting will be visible over long distances and creates a continuous intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

The proposal fails to evaluate the effects of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This is especially important given the role of dark skies in the area's identity and the potential for growth in tourism sectors such as astro-tourism. The omission of these impacts results in a notable shortfall in the overall landscape and environmental assessment.

Additionally, there is a complete absence of evaluation regarding the impacts on nocturnal wildlife. Species like the Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly sensitive to artificial lighting due to their phototactic responses, which can lead to disorientation and higher collision risks. The application lacks any lighting impact assessment or study of phototaxis, failing to consider how the proposed aviation lighting could affect these species or increase mortality rates.

This issue is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not account for nocturnal activities or associated risks. Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this concern has not been addressed. The absence of site-specific night-time data presents a critical gap in understanding the ecological impacts of the proposal.

Without a thorough assessment of nocturnal impacts, it becomes impossible to determine whether protected species or designated sites could be adversely affected. The necessary evidential standard to exclude adverse effects beyond reasonable scientific doubt remains unmet, invoking the precautionary principle and hindering a lawful determination.

From a policy perspective, this omission contradicts the National Planning Framework 4 regarding the protection of natural areas and environmental quality. Furthermore, it undermines the overall assessment of landscape and seascape impacts, as the character of night-time is a vital component of the environment.

In summary, the lack of any assessment concerning dark skies and nocturnal wildlife

creates a significant evidential gap. The absence of baseline data, impact modelling, and species-specific analysis renders the application incomplete and unable to support a lawful determination.

TOURISM

The application acknowledges that 86% of visitors are attracted to the Isle of Lewis due to its scenery. However, it fails to provide a quantified assessment of how large-scale offshore infrastructure may influence visitor numbers, behaviours, or the overall economic contribution of tourism. This oversight is critical, given that tourism plays a significant role in the local economy, having grown from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy.

Furthermore, the assessment does not consider how the industrialisation of the seascape and a decline in environmental quality could impact Tourism Gross Value Added or the economic resilience of the area. Without this analysis, it remains uncertain whether the proposed development would yield a net economic benefit or jeopardise a vital and expanding sector.

In addition, the role of environmental quality is not addressed, specifically regarding unspoiled landscapes and dark skies, which are crucial to visitor experience and emerging markets like nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this issue, resulting in a significant gap in understanding the impacts on a recognised and growing sector of the local economy.

The implications extend beyond just tourism; in an island community with limited economic diversification, the lack of a comprehensive assessment of tourism impacts raises concerns for employment, local businesses, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment means these economic vulnerabilities, as required under the Islands (Scotland) Act 2018, have not been evaluated.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, particularly regarding economic impact and the necessity of proving net benefit. It conflicts with strategic objectives that prioritise tourism as a growth sector and fails to furnish adequate evidence for the competent authority to assess the economic consequences of the proposal.

Overall, the inability to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and acknowledge the island's economic dependency results in a

significant evidential gap. This shortcoming hampers a thorough evaluation of economic effects and contributes to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm starkly fails to meet the standards for sustainable development, as evaluated against legal obligations, national policy, and evidential criteria. This application repeats fundamental issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. It is now being submitted under a more robust policy framework, which emphasises the importance of biodiversity, peatland conservation, landscape integrity, and community wellbeing.

There are significant gaps in the evidential basis needed for a proper assessment of the application. It lacks comprehensive baseline data, continues to employ an undefined design envelope, depends on unspecified mitigation measures, and omits key impact pathways such as those concerning nocturnal wildlife, full onshore infrastructure, and tourism consequences. This results in an incomplete Environmental Impact Assessment, which fails to provide a full understanding of the likely significant effects or residual impacts.

Moreover, clear procedural shortcomings are evident. The failure to produce a compliant Island Communities Impact Assessment is a violation of statutory duties under the Islands (Scotland) Act 2018, while not disclosing the complete Social Impact Assessment amounts to a significant omission. Such shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for a lawful determination.

The proposal directly contravenes the National Planning Framework 4. It does not demonstrate adequate protection of biodiversity, natural environments, or cultural heritage, nor does it prove that health and wellbeing impacts are acceptable. Additionally, it fails to provide evidence of a net economic benefit owing to the lack of tourism impact assessments. The cumulative effects of both offshore and onshore components have not been adequately evaluated, clouding potential impacts on peatlands, carbon balance, habitats, and agricultural land.

Environmental risks associated with the project remain ambiguous and could be significantly detrimental. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, inconsistent. The application does not meet the evidential threshold necessary to confidently conclude that adverse effects can be ruled out, thereby invoking the

precautionary principle, which complicates any lawful declaration of acceptable impacts.

Furthermore, the project would lead to considerable and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, and the disruption of cultural and visual connections, along with the repercussions for tourism, represent lasting effects that cannot be adequately mitigated.

In conclusion, the application is procedurally and substantively unfit for determination. The extensive information deficiencies, alongside policy conflicts and unresolved environmental risks, impede a lawful, evidence-based decision. The competent authority should refuse consent on these bases or invoke relevant regulatory provisions to obtain the required missing information. Therefore, a formal request is made for the complete refusal of the application for the Spiorad na Mara Offshore Wind Farm.

Additional Comments

I am deeply concerned about the way this offshore wind farm has been imposed on the Isle of Lewis, with little meaningful explanation, transparency, or genuine consultation with the communities most directly affected. The process to date has left many residents feeling sidelined and unheard, despite the scale and permanence of the impact these decisions will have on our island.

The consequences of this development are far-reaching and devastating. It threatens to fundamentally alter Lewis as we know it. I question what right Crown Estate Scotland has to award use of the seabed without proper engagement with the communities whose lives, livelihoods, and environment will be directly affected. Equally, Comhairle nan Eilean Siar had no basis to claim there was strong community support when there was no open, inclusive discussion to establish this.

The visual impact alone will permanently damage our unique and internationally valued landscape. Tourism, which is a vital part of our local economy, will be irreversibly affected. Visitors come here for unspoilt scenery, tranquillity, and natural beauty. If tourism declines, a major income stream will be lost, businesses will fail, jobs will disappear, and young people will be forced to leave the island. The long-term consequence is the erosion — and eventual loss — of our communities.

The risks to wildlife are equally alarming. It is deeply troubling that disruption to the natural habitats of rare and protected species could be considered acceptable in any context. These ecosystems are fragile and irreplaceable, and once damaged, they cannot simply be restored.

Crofters and fishermen have worked these lands and seas for generations. This is not only an economic activity, but a way of life rooted in heritage, sustainability, and stewardship of the environment. It is difficult to understand how decisions of this magnitude can be made without even speaking to the communities whose livelihoods and cultural identity are placed at risk.

Construction and associated infrastructure will affect the daily lives of everyone who lives on or visits the island. The cumulative impact threatens the survival of whole communities.

Already, the uncertainty and scale of the proposed development are having a measurable negative effect on mental health, as residents worry about the future for themselves, their children, and their grandchildren. This is a generational change that will affect families and communities for decades to come.

Finally, there is a complete lack of clear, tangible evidence demonstrating how this project will benefit our local communities. At present, there is no convincing case that this development serves the people of Lewis in any meaningful way.

Member of Public 219

Objection To Spiorad na Mara Offshore Wind Farm
References: MD-00011742 & MD-00011743

Dear Sir/Madam

This letter serves as a formal objection to the application for the proposed Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. My concerns stem from a thorough review of the Environmental Impact Assessment Report and its supporting documentation, revealing significant deficiencies across planning, environmental, cultural, and procedural domains. The development is situated off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, nearly untouched environment, and rich cultural identity. The proposal's scale, design, and proximity to the shoreline raise serious doubts regarding its alignment with statutory requirements, national policy, and sustainable development principles.

The application does not present a sufficient evidential basis for a lawful determination. There are critical gaps in environmental data, baseline information is both limited and inconsistent, and numerous aspects of the proposal remain undefined. The reliance on a flexible design framework obscures a clear understanding of likely significant effects, while the unspecified mitigation measures make it impossible to assess their potential effectiveness. Consequently, the provided documentation fails to facilitate a comprehensive understanding of environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsubstantiated by robust evidence.

Moreover, there are evident and serious policy conflicts. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate that national obligations to safeguard biodiversity, climate interests, and environmental integrity can be fulfilled. These conflicts directly impact the statutory tests necessary for consent and compromise the competent authority’s ability to affirm that the development is acceptable in policy terms.

The scale of this proposal is unprecedented in this specific location, with large turbines positioned in close proximity to the shoreline, leading to substantial concerns about landscape capacity, visual dominance, and environmental repercussions. Collectively, the lack of adequate information, the reliance on undefined mitigation measures, the evidential weaknesses, and the clear policy non-compliance illustrate that the

application is incomplete and incapable of securing a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies, failing to deliver a comprehensive, transparent, or reliable overview of the proposal's likely environmental effects. Central to this inadequacy is the use of a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations. This approach introduces considerable uncertainty, hindering the consistent application of a worst-case scenario, thereby undermining the integrity of the assessment. Consequently, the impacts outlined may not accurately represent the development that will ultimately be constructed, restricting both the public's and the competent authority's ability to gauge the true extent of environmental effects.

Additionally, the application places considerable reliance on undefined mitigation measures, monitoring strategies, and management plans, which remain unarticulated at this stage. Seeking consent based on the premise that environmental harm will be mitigated subsequently obstructs a meaningful evaluation of effectiveness or the assessment of residual impacts. Such a deferral of vital information to post-consent phases is procedurally unacceptable, contradicting the essential purpose of the Environmental Impact Assessment regime, which necessitates that significant effects and mitigation be clearly established prior to determination.

There are also notable evidential shortcomings, including gaps in baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. These issues contribute to uncertainty regarding the scale and significance of impacts, particularly where findings of negligible or non-significant effects are asserted without robust supporting data. The lack of sufficient information precludes a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainties that cannot align with statutory requirements.

As a result, the application does not satisfy the evidential threshold mandated under the Habitats Regulations, which is necessary to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate compliance with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it cannot confirm that impacts have been thoroughly assessed or that appropriate safeguards have been established.

In summary, the combination of reliance on an undefined design envelope, the absence

of specified mitigation measures, and significant gaps in baseline data render the Environmental Impact Assessment Report incomplete and unreliable. These deficiencies impede a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make an informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives presented in this application is inadequate and fails to meet the necessary statutory requirements of the Environmental Impact Assessment regime. Rather than offering a well-structured comparison of realistic alternatives based on environmental effects, the application provides a narrative of project evolution. This lack of analysis does not demonstrate that less harmful options have been properly identified, assessed, and selected over more damaging solutions.

In particular, there is no clear or evidence-based comparison of various offshore locations, development scales, or design configurations. The application does not show that the developer has seriously considered placing turbines further offshore, where visual, ecological, and coastal impacts would likely be reduced. The sensitivity of the West Lewis coastline, along with the critical importance of proximity to shore in determining impact, underscores the necessity for this analysis. The absence of such consideration undermines any claim that the proposed siting is the least damaging option available.

Furthermore, these shortcomings extend to the assessment of cable routing and landfall, as there is insufficient evidence that alternative routes have been adequately explored to minimise impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The lack of a clear avoidance strategy and failure to conduct comparative analysis suggest that mitigation by design has not been employed, with a reliance instead on post-design mitigation measures.

As a consequence, the application does not demonstrate that environmental harm has been minimised through thoughtful site selection, layout, and infrastructure routing. This failure to adhere to the established mitigation hierarchy prevents the competent authority from determining whether more appropriate and less harmful alternatives exist. The absence of a robust alternatives assessment further casts doubt on the sustainability and policy compliance of the proposal.

From a policy standpoint, this inadequacy undermines adherence to National Planning Framework 4, particularly regarding the protection of natural places, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment is a significant omission that contributes to the overall conclusion that the

application has not been sufficiently evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is fundamentally flawed, lacking a comprehensive and reliable understanding of the ecological receptors present in this sensitive and biologically rich marine system. The methodologies employed are inadequate, resulting in incomplete baseline data that fails to accurately capture the presence, behaviour, and habitat use of various species. Consequently, this assessment does not offer a solid evidential basis for evaluating potential impacts.

One significant oversight concerns otters, which are recognised as a European Protected Species. The application does not adequately acknowledge or assess the active use of coastal areas by otters for foraging and movement. The failure to consider their core foraging range and behavioural patterns leads to an insufficient assessment of the potential effects of construction disturbances, noise, and increased activity. This gap undermines any conclusions drawn regarding the absence of significant effects on this species.

Further shortcomings are evident in the assessment of basking sharks. The reliance on aerial surveys introduces a considerable detection bias, particularly under Atlantic conditions. This methodology is likely to result in an underestimation of the presence of basking sharks, especially in light of established land-based observations that indicate these waters are frequently used by them. The omission of such relevant data results in an incomplete baseline and diminishes the reliability of the conclusions reached.

These methodological deficiencies mean that any conclusions regarding negligible or non-significant effects are based more on assumptions than on rigorous evidence. The lack of adequate baseline data also hampers the ability to meaningfully assess cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation generates uncertainty regarding the true scale of risk posed to marine species and their habitats.

From a regulatory standpoint, the application does not fulfil the requirements set out in the Environmental Impact Assessment regime and National Planning Framework 4, as it has failed to identify or assess protected species properly. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these conditions, granting consent would not be lawful.

In summary, the assessment's reliance on incomplete baseline data, flawed methodologies, and unsupported conclusions renders it unreliable. These shortcomings hinder a robust evaluation of impacts on marine ecology and protected species, leading to the overall determination that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application is fundamentally unreliable and contains significant gaps in evidence and internal contradictions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application does not adequately demonstrate that these species will not be adversely affected. The development is situated within key foraging areas and migratory pathways, yet the implications of displacement, collision risk, or habitat loss have not been thoroughly evaluated.

There is a notable contradiction in the application. The developer claims that there will be no significant adverse effects while also pursuing a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the available evidence.

The evidence provided fails to show that seabirds connected with protected sites, such as the Lewis Peatlands and St Kilda, will remain unharmed. The significance of these feeding grounds is not properly considered, and the reliance on modelling methods introduces uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars. The methodologies used are likely to underestimate potential mortality, especially since baseline data is lacking and behavioural responses are not fully understood.

Placing turbines within a recognised migratory corridor poses an additional and serious risk. It effectively creates a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term consequences of ongoing mortality in this corridor or the potential impact on species with relatively small global populations.

From a regulatory standpoint, the application does not meet the required evidential threshold to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This engages the precautionary principle, which prevents a lawful conclusion in favour of consent.

The deficiencies noted also represent a failure to adhere to the National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to show that internationally important seabird populations will not be negatively impacted puts the proposal in direct conflict with national policy.

In summary, the assessment is undermined by internal inconsistencies, methodological flaws, and insufficient evidence. These deficiencies hinder a thorough evaluation of potential impacts and contribute to the overall conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The application presents a significant lack of thoroughness in its assessment of cultural heritage and community identity, treating the West Lewis coastline merely as a collection of static assets rather than a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. By adopting a reductive approach, it overlooks the ongoing social, cultural, and spiritual functions these heritage sites serve within the community.

A notable shortcoming is evident in the handling of culturally significant locations, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are actively used for burial and spiritual practices, yet they are inaccurately classified as static features. This failure to consider their continued use and meaning leads to an incomplete understanding of the cultural implications and neglects their vital role in community life.

Moreover, the assessment disregards intangible cultural heritage, which includes the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These aspects are central to the area's identity yet are entirely absent from the evaluation, marking a significant oversight. Without accounting for these factors, it becomes impossible to grasp the true cultural impact of the proposed development.

Concerns extend to community rights and engagement, especially considering that the Gaelic-speaking population embodies characteristics of an Indigenous People. The absence of a process for Free, Prior and Informed Consent raises questions about the legitimacy of the assessment and fails to align with recognised principles of participatory decision-making that affect cultural and environmental interests.

Additionally, there is a critical procedural failure due to the lack of a compliant Island Communities Impact Assessment, a statutory requirement established under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic effects

on the island community. This omission alone renders the determination of the proposal unlawful.

From a policy perspective, the identified deficiencies place the application in direct contradiction with National Planning Framework 4, particularly concerning the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, constitutes a clear deviation from policy standards.

Collectively, the failure to address living heritage, intangible cultural value, community rights, and statutory requirements culminates in a considerable evidential gap. The cultural consequences of the development have not been adequately assessed, and the application lacks a sufficient basis for a proper evaluation of the genuine cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the Social Impact Assessment is a critical concern that undermines the integrity of the entire evaluation process. The developer has conducted a Social Impact Assessment, which included focus groups with local residents, but the comprehensive report remains unpublished. This significant gap in evidence restricts both public understanding and the ability of the competent authority to grasp the complete range of social risks identified in the developer's own research.

Residents are reportedly experiencing considerable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts are based on direct engagement and are not mere speculation. However, the absence of the full assessment limits the opportunity for thorough examination of these findings, which is essential for informed decision-making.

Moreover, there is growing sentiment that the proposal threatens community identity and cohesion, with findings highlighting "cultural loss." Despite the significance of these impacts, they have not been adequately incorporated into the main application or given the necessary consideration. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development.

This situation has serious implications for the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health impacts is crucial, especially for developments of this magnitude that may affect community character. The failure to provide complete data means the application lacks a comprehensive evidential basis for weighing benefits against potential harms.

From a policy standpoint, the application does not comply with National Planning Framework 4 concerning health and wellbeing. Developments are required to promote positive health outcomes and mitigate harm, yet the evidence suggests there are existing adverse effects that remain undisclosed. Without access to the full assessment, compliance with this policy is unproven.

The procedural ramifications are significant as well. The competent authority cannot conduct a robust socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This represents a major omission within the application and fails to meet the evidential standards mandated by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, alongside the documented existing adverse impacts, results in an incomplete and unreliable evaluation. This deficiency hampers a lawful determination and reinforces the assertion that the application is not substantiated by adequate information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual and landscape impacts associated with the proposed development is fundamentally flawed and does not adequately convey the scale of change or the sensitivity of the environment. The coastline of West Lewis is characterised by its expansive Atlantic views, its undeveloped nature, and a profound sense of isolation. The planned installation of large turbines near the shoreline would impose an overwhelming industrial presence that would drastically alter this landscape, leading to a permanent and irreversible change in its character.

Moreover, the application fails to adequately represent the extent of visual change anticipated. The scale and proximity of the turbines are such that they would overshadow views from residential zones, historic sites, and popular coastal areas. This would significantly diminish visual amenity and compromise the essential qualities of naturalness and remoteness. The assessment has not effectively communicated the severity of these impacts or their significance within this sensitive landscape context.

Methodological shortcomings further undermine the evaluation, especially regarding the selection and representation of visual viewpoints. It appears that some viewpoints do not sufficiently capture the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises concerns that the actual magnitude of visual impact has been understated, casting doubt on the assessment's overall reliability.

Additionally, there is a critical oversight in evaluating the interconnectedness of

landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape that is visually and spatially tied to the Atlantic horizon. The assessment treats these assets in isolation without acknowledging their interdependence, leading to an incomplete understanding of the impacts on their settings and cultural significance.

The industrialisation of the seascape would disrupt these connections, changing the context in which these heritage assets are appreciated and breaking their link to the natural horizon. This not only results in visual impacts but also inflicts broader cultural and spatial damage that the application has not adequately addressed.

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4, particularly concerning the safeguarding of natural places and historic assets. The extent of change proposed is fundamentally incompatible with the need to preserve landscape character, visual amenity, and the setting of culturally significant sites. The lack of a thorough worst-case scenario assessment further weakens any argument of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. Given the size, height, and proximity of the turbines, their presence would be dominant and impossible to overlook. The resulting transformation of the landscape is thus fundamental and permanent, rather than something that can be reduced to an acceptable level through mitigation efforts.

In summary, the assessment inadequately reflects the scale of impact, the sensitivity of the environment, and the interrelatedness of landscape and heritage. These significant deficiencies hinder a reliable evaluation and reinforce the conclusion that this proposal is not compatible with the protection of the landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal includes extensive seabed preparation and installation works in a high-energy Atlantic environment, yet it lacks comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are intended to be developed after consent, which hampers any meaningful assessment of their sufficiency or effectiveness. This approach raises significant concerns, particularly given the sensitivity of the surrounding environment. The West Lewis coastline features clean coastal waters and important habitats that are at risk from sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it fails to detail how these risks will be prevented, controlled, or monitored.

Moreover, there is uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it remains impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also extends to potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment.

Additionally, the lack of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning until after consent, the application obstructs the evaluation of whether suitable safeguards are in place to address pollution incidents. This introduces procedural risk and undermines the capacity of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the postponement of critical environmental safeguards is in conflict with the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be evaluated before consent, and the absence of such information precludes a lawful determination. The application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts collectively render the assessment materially deficient. These deficiencies obstruct a thorough evaluation of construction and pollution risks, reinforcing the argument that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment of marine life and fisheries is fundamentally inadequate, lacking a thorough evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing industry; however, the application does not convincingly demonstrate how these vital uses and habitats will be preserved or sustained without significant disruption.

A critical issue lies in the presumption that fishing activity can be displaced without repercussions. The application fails to present any evidence indicating that alternative fishing grounds are viable, accessible, or capable of handling the additional pressure resulting from such displacement. This lack of information is alarming, as it poses a risk of overfishing in other areas and could have broader economic ramifications for the local fishing fleet. Without a clear and well-supported assessment, it is impossible to fully grasp the impacts on fisheries and local livelihoods.

Moreover, the proposal poses significant risks to marine species, especially due to the underwater noise generated during construction activities. The prolonged use of high-energy hammer piling is likely to disturb marine life over considerable distances, adversely affecting species like dolphins. The anticipated disruption to a large portion of the local bottlenose dolphin population is concerning, yet the application minimises these effects without providing adequate supporting evidence.

There exists a troubling inconsistency within the application itself; while it acknowledges the necessity for licences to permit harm to European Protected Species, it simultaneously characterises these impacts as negligible. This contradiction diminishes the credibility of the assessment and raises serious questions about compliance with the Habitats Regulations, particularly when harm is predicted to a level that requires legal authorisation.

Furthermore, the assessment neglects to consider the cumulative impacts stemming from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. Without an all-encompassing evaluation of these interconnected effects, it remains impossible to ascertain the overall impact on marine ecosystems and the socio-economic landscape.

From a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not provide evidence that the development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, thus failing to establish that the proposal is an example of sustainable development.

In summary, the deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions render the assessment incomplete and untrustworthy. These shortcomings obstruct a comprehensive evaluation of the implications for marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal presents a series of significant concerns regarding its treatment of onshore infrastructure, which is assessed in isolation from the offshore components of the project. This fragmented approach obscures the true environmental and socio-economic impacts, as the onshore works, including cabling through protected moorland, the construction of a substation near Stornoway, and the required access infrastructure, are intrinsically linked to the offshore turbines.

A critical element of the onshore infrastructure is the excavation across areas of deep

peat, particularly in Barvas Moor, which serves as both an ecologically sensitive habitat and a substantial carbon store. The failure to provide a comprehensive assessment of these impacts limits the understanding of the project's overall environmental footprint, leaving essential questions unanswered.

Moreover, the application does not adequately consider the cumulative effects of separating the assessments for offshore and onshore components. The Environmental Impact Assessment process mandates that all elements of a project be evaluated collectively. Consequently, the separation prevents a thorough understanding of the combined impacts on peatlands, habitats, and local communities.

Sensitive habitats, including machair systems and peatland environments, are at risk, and the application falls short in demonstrating that these impacts have been fully assessed or that necessary avoidance measures are in place. This oversight highlights a significant gap in the evidence required for biodiversity protection. Additionally, the disturbance of peatland raises concerns about carbon balance, as released stored carbon could create a carbon debt, undermining the aims of renewable energy initiatives.

There are also serious implications for land use, particularly with the routing of infrastructure through active croft land. The application lacks evidence that it has obtained the necessary consents or initiated appropriate processes, which raises questions about the feasibility and legality of the project.

From a policy standpoint, the failure to evaluate the project as an integrated whole, coupled with the inadequate protection of peatlands, habitats, and land use rights, conflicts with the National Marine Plan and National Planning Framework 4. The inability to demonstrate effective avoidance or mitigation strategies further weakens the application.

In summary, the lack of comprehensive assessment and the separation of project components, along with insufficient evidence regarding environmental and land use impacts, renders this part of the application incomplete and unreliable, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding nocturnal wildlife and dark skies represents a serious shortfall within the Environmental Impact Assessment. The West Lewis coastline, known for its exceptionally dark skies, is crucial for environmental quality, cultural identity, and tourism, particularly in emerging sectors such as astro-tourism. The introduction of permanent red aviation lighting, which would be visible over extensive

distances, risks creating an intrusive "wall of light" effect that would significantly disrupt the natural night-time environment.

There is no evaluation of the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This oversight is particularly concerning considering the significance of dark skies to the local identity. Moreover, the assessment fails to address the implications for nocturnal wildlife, including species such as the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, which are particularly vulnerable to artificial lighting due to their phototactic responses that may lead to disorientation and increased collision risks. The application does not provide a lighting impact assessment or a phototaxis study, meaning the potential effects of aviation lighting on these species, along with the associated mortality risks, remain unexamined.

This critical oversight is exacerbated by an overreliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activities or the risks they entail. Species such as Kittiwakes, which may forage or migrate at night, are equally at risk of disorientation from artificial lighting, yet this has not been included in the assessment. The absence of specific data regarding night-time conditions creates a significant gap in understanding the ecological impacts involved.

Without a thorough evaluation of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites may be adversely affected. The evidential standard necessary to exclude potential adverse effects beyond reasonable scientific doubt cannot be satisfied, thereby invoking the precautionary principle and hindering a lawful determination of the application.

From a policy standpoint, this oversight is at odds with National Planning Framework 4, which pertains to the safeguarding of natural spaces and environmental quality. It also compromises the overall assessment of landscape and seascape impacts, as the character of night-time environments is a fundamental component of the broader ecological context.

In summary, the absence of assessments concerning dark skies and nocturnal wildlife creates a substantial evidential void. The lack of baseline data, impact modelling, and species-specific analysis renders the application incomplete and insufficient for supporting a lawful determination.

TOURISM

The assessment of tourism impacts is fundamentally inadequate and neglects to address the economic and social consequences for a crucial sector of the Isle of Lewis

economy. Tourism relies heavily on the area's wild coastline, nearly pristine landscapes, dark skies, and sense of remoteness. The application itself notes that 86% of visitors are attracted by the scenery, yet fails to provide a quantified evaluation of how extensive offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution.

Tourism has experienced substantial growth, rising from £65 million in 2017 to over £81.5 million, facilitating more than 1,000 jobs and making up to 16% of the island's economy. Nevertheless, the application does not examine how the industrialisation of the seascape and degradation of environmental quality would affect Tourism Gross Value Added or the broader economic resilience. Without such an analysis, it remains unclear whether the development would yield a net economic benefit or jeopardise an established and expanding sector.

The assessment further overlooks the critical role of environmental quality in supporting tourism, including the value of unspoiled landscapes and dark skies for visitor experiences and emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a significant void in understanding the impacts on a recognised and growing segment of the local economy.

In an island community with limited economic diversity, the failure to assess tourism impacts has broader implications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been evaluated as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not illustrate compliance with National Planning Framework 4, particularly regarding economic impact and the necessity to demonstrate net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector, lacking sufficient evidence to enable the competent authority to evaluate the economic implications of the proposal.

Collectively, the failure to quantify tourism impacts, assess environmental factors affecting visitor behaviour, and consider the island's economic dependency leads to a significant evidential gap. This deficiency obstructs a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates a significant failure to meet the criteria of sustainable development, as it does not align with

statutory duties, national policy, or evidential standards. This application echoes the primary concerns that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. It is presented now under a policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing, yet fails to address these critical areas effectively.

Significant gaps exist in the evidential basis necessary for informed determination. The application lacks comprehensive baseline data and continues to utilise an undefined design envelope. Furthermore, it relies on unspecified mitigation measures and neglects to address key impact pathways such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism. As a result, the Environmental Impact Assessment is incomplete, failing to provide a full understanding of potential significant effects or residual impacts.

Moreover, there are evident procedural shortcomings. The lack of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018. The omission of a full Social Impact Assessment further highlights material deficiencies that hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal stands in direct opposition to the National Planning Framework 4, as it does not demonstrate protection for biodiversity, natural places, or cultural heritage. It fails to show that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. Additionally, the cumulative impacts of offshore and onshore components have not been adequately assessed, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal are uncertain and could be significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals remain incomplete and, in certain areas, inconsistent. The necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and precluding a lawful conclusion regarding acceptable impacts.

This proposal would lead to substantial and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruptions to cultural and visual relationships, and tourism impacts represent permanent changes that cannot be mitigated to an acceptable degree.

In summary, the application is both procedurally and substantively unfit for determination. The significant deficiencies in information, along with conflicts with policy and unresolved environmental risks, obstruct a lawful and evidence-based decision. It is imperative for the competent authority to either refuse consent on these grounds or to invoke the necessary regulatory provisions to mandate the submission of the outstanding information.

Therefore, I formally request that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Member of Public 220

Objection To Spiorad na Mara Offshore Wind Farm
References: MD-00011742 & MD-00011743

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The concerns expressed are rooted in a thorough review of the Environmental Impact Assessment Report and accompanying documentation, highlighting significant planning, environmental, cultural, and procedural deficiencies.

The development site is situated off the west side of the Isle of Lewis, an area distinguished by its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. The proposal's scale, design, and proximity to the shoreline raise essential questions about its alignment with statutory requirements, national policy, and sustainable development principles.

Crucially, the application lacks a sufficient evidential basis for lawful determination. There is a notable absence of critical environmental data, with baseline information being both limited and inconsistent. Several key aspects of the proposal are still undefined, and the use of a flexible design framework obscures the likely significant effects. The reliance on unspecified mitigation measures further complicates the assessment, making it impossible to evaluate their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, and assertions regarding negligible or non-significant effects lack robust support.

Furthermore, there are clear and significant policy conflicts within the application. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not adequately demonstrate compliance with national requirements aimed at safeguarding biodiversity, climate interests, and environmental integrity. These inconsistencies directly undermine the statutory tests necessary for consent and diminish the competent authority's ability to deem the development acceptable from a policy standpoint.

The unprecedented scale of the proposal, with large turbines positioned near the shoreline, raises considerable concerns about landscape capacity, visual dominance,

and environmental impact. In light of the insufficient information provided, the dependence on undefined mitigation strategies, evidential weaknesses, and clear non-compliance with policy, it is evident that the application is incomplete and cannot support a lawful determination. Under these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary transparency and reliability, failing to fully account for the potential environmental effects of the proposal. The flexible Project Design Envelope approach, which does not commit to specific turbine dimensions, layouts, or configurations, introduces a substantial level of uncertainty. This uncertainty hampers the ability to apply a worst-case scenario consistently, ultimately undermining the integrity of the assessment. Consequently, the information provided may not accurately represent the impacts of the eventual construction, leaving both the public and competent authority without a clear understanding of the actual environmental consequences.

Moreover, the application is overly reliant on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent under these conditions means that environmental harm is expected to be addressed later, making it impossible to meaningfully evaluate the effectiveness of these measures or to assess residual impacts. This postponement of crucial information to post-consent phases is procedurally unacceptable and runs counter to the objectives of the Environmental Impact Assessment process, which necessitates that significant effects and mitigation strategies are clearly defined before any determination can occur.

There are also considerable evidential shortcomings, characterised by gaps in baseline data, methodological limitations, and an over-reliance on assumptions instead of site-specific evidence. Such deficiencies create uncertainty regarding the magnitude and significance of impacts, especially in cases where claims of negligible or non-significant effects are made without adequate supporting data. The lack of comprehensive information obstructs a clear understanding of cumulative and worst-case impacts, leading to scientific uncertainties that are incompatible with statutory obligations.

Ultimately, the application does not satisfy the evidential standards set forth by the Habitats Regulations, which require the exclusion of adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate alignment with the National Planning Framework 4, particularly in relation to the protection of biodiversity and environmental integrity, as it has not been shown

that impacts have been fully assessed or that adequate safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specified mitigation measures, and significant gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings hinder a lawful and thorough assessment of environmental effects, leaving the competent authority without the necessary information to make an informed decision regarding the application.

ASSESSMENT OF ALTERNATIVES

The application's assessment of alternatives is fundamentally lacking and does not satisfy the statutory requirements set forth by the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives in terms of their environmental impacts, the documentation provides a narrative on the project's evolution. This method does not adequately demonstrate that less harmful options have been properly identified, assessed, and selected over more damaging alternatives.

There is no transparent or evidence-based evaluation of alternative offshore locations, development scales, or design configurations. Notably, the application fails to show that the developer has seriously explored the possibility of placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be mitigated. Considering the sensitivity of the West Lewis coastline and the significant role that proximity to shore plays in assessing impact, the lack of such an analysis precludes any determination that the proposed siting is the least damaging option.

These shortcomings also extend to the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly examined to avoid or lessen impacts on sensitive receptors, including areas of cultural and spiritual significance, such as Barvas Cemetery. The absence of a clear strategy for avoidance and the lack of comparative analysis reveal that mitigation by design has not been implemented, with reliance instead on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through site selection, layout, and infrastructure routing. This signifies a failure to adhere to the established mitigation hierarchy and hinders the competent authority's ability to ascertain whether less harmful and more suitable alternatives exist. In the absence of a comprehensive alternatives assessment, it cannot be concluded that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this inadequacy compromises adherence to National

Planning Framework 4, particularly regarding the protection of natural places, cultural heritage, and community wellbeing. The failure to conduct a structured and comparative assessment is a significant omission that contributes to the overall conclusion that the application has not been sufficiently evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is fundamentally inadequate, lacking a thorough and reliable understanding of ecological receptors in this sensitive marine system. The methodologies employed are insufficient to accurately capture species presence, behaviour, and habitat utilisation, leading to a deficient evidential basis for evaluating impacts.

Particularly concerning is the omission of otters, classified as a European Protected Species, with the application failing to appropriately recognise their active use of coastal regions for foraging and movement. The neglect of their core foraging range and behavioural patterns undermines the assessment of potential impacts arising from construction disturbance, noise, and heightened activity. Consequently, this oversight casts doubt on the conclusions drawn regarding the absence of significant effects on otters.

In addition, the assessment of basking sharks is flawed due to an over-reliance on aerial surveys, which introduces a significant bias in detection, especially in the Atlantic conditions. This method likely leads to an underestimation of their presence in these waters, particularly when juxtaposed with established land-based observations that demonstrate frequent use. The omission of such relevant data results in an incomplete baseline and diminishes the reliability of the conclusions presented.

The methodological shortcomings result in the conclusions regarding negligible or non-significant effects being based on assumptions rather than substantiated evidence. The lack of adequate baseline data hinders meaningful assessments of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty obscures the actual scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application fails to comply with the Environmental Impact Assessment regime and National Planning Framework 4, as it does not adequately identify or assess protected species. The level of uncertainty introduced prevents the exclusion of adverse effects beyond a reasonable scientific doubt, necessitating the application of the precautionary principle. Under these circumstances, the granting of consent cannot be justified legally.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions culminates in an assessment that is unreliable. These deficiencies obstruct a robust evaluation of impacts on marine ecology and protected species, leading to the overarching conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application fails to demonstrate that internationally important seabird populations along the west coast of the Isle of Lewis will not be adversely affected. This region supports many seabirds that are already in decline, and yet the ornithological assessment is materially flawed, containing significant gaps in evidence and internal inconsistencies that undermine its conclusions. The siting of turbines within a recognised migratory corridor introduces considerable risk, creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The assessment does not adequately consider the long-term implications of sustained mortality in this corridor or the potential effects on species with small global populations.

Moreover, there exists a fundamental contradiction within the application, as the developer concludes no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case. Such a case is only required when significant harm is expected, which calls into question the reliability of the assessment. The assessment lacks sufficient evidence to confirm that seabirds associated with protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is inadequately addressed, and the reliance on modelling approaches introduces uncertainty, particularly for species in severe decline, such as Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality rates, especially in instances where baseline data is incomplete and behavioural responses are not fully understood.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to conclude there is no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data gaps and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been satisfied. This situation invokes the precautionary principle and prevents a lawful conclusion in support of consent. Furthermore, the identified deficiencies represent a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. Ultimately, the assessment is deemed unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence, which collectively hinder a robust evaluation of impacts and

confirm that the application does not meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of community identity and cultural heritage is fundamentally flawed, as it does not recognise the West Lewis coastline as a vibrant cultural landscape where environment, tradition, language, and community are interconnected. The approach taken in the application reduces heritage to mere isolated assets, neglecting their ongoing cultural, spiritual, and social significance within the community.

A major shortcoming is the treatment of culturally significant sites, such as the cemeteries located at Dalmore, Bragar, and Barvas. These sites are active burial grounds and places of spiritual practice, yet they are classified as static features in the assessment. This mischaracterisation fails to account for their continued use, the significance they hold, and the implications of development on their surroundings. Consequently, this results in an incomplete understanding of the cultural effects and ignores their importance to community life.

Moreover, the application overlooks intangible cultural heritage elements, including the Gaelic language, local traditions, and the historical relationship between the community and the coastal environment. These factors are integral to the area's identity, yet they are completely absent from the assessment, creating a significant gap. Without these considerations, the cultural impact of the proposed development cannot be accurately gauged.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity recognised as characteristics of an Indigenous People, but there has been no process of Free, Prior and Informed Consent implemented. The lack of meaningful engagement undermines the legitimacy of the assessment and does not adhere to established principles of participation in decisions that affect cultural and environmental interests.

A critical procedural issue is the failure to conduct a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot legally assess the social, cultural, and economic impacts on the island community. This omission alone renders the determination of the proposal unlawful.

From a policy perspective, these deficiencies place the proposal in direct conflict with National Planning Framework 4, particularly regarding the protection of historical assets and places. The neglect to address both tangible and intangible heritage and to

acknowledge living cultural practices represents a significant departure from policy requirements.

In summary, the failure to assess living heritage, intangible cultural value, community rights, and statutory obligations results in a substantial evidential gap. The cultural impacts of the development remain inadequately assessed, and the application does not provide an adequate foundation for evaluating the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency regarding the Social Impact Assessment significantly undermines the evaluation of social impacts, health, and wellbeing associated with the proposed development. While the developer engaged with local residents through focus groups, the full report remains unpublished, creating a crucial evidential gap. This absence of information obstructs both public understanding and the competent authority's ability to gauge the extent of social risks identified through the developer's research.

Preliminary summaries reveal that residents are currently facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposal. These issues stem from direct community engagement and are not based on speculation. Nonetheless, the withholding of the complete assessment restricts thorough scrutiny of the findings and hinders the determination of their significance in the decision-making process.

Moreover, there is recognition that the proposal poses a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite this acknowledgment, such impacts have not been adequately integrated into the main application or given the appropriate consideration. By not disclosing the entire Social Impact Assessment, the true human and social costs of the development remain obscured.

This lack of transparency also undermines the Environmental Impact Assessment process, as a comprehensive understanding of social, economic, and health implications is crucial for developments of this scale. The application fails to present a complete evidential basis necessary for assessing the balance between benefits and potential harm by omitting the full dataset.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Development should promote positive health outcomes while minimising harm, yet the available evidence highlights existing adverse effects that remain inadequately disclosed. Without access

to the full assessment, demonstrating adherence to this policy is not feasible.

The procedural ramifications are substantial. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a material omission in the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment framework.

In summary, the non-disclosure of the complete Social Impact Assessment, along with the evidence of existing adverse impacts, renders the assessment both incomplete and unreliable. This situation hampers a lawful determination and reinforces the assertion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment conducted on seascape, landscape, and visual impacts lacks sufficient detail and does not accurately reflect the scale of change or the sensitivity of the surrounding environment. The character of the West Lewis coastline is marked by an open Atlantic horizon, an undeveloped landscape, and a strong sense of remoteness. Introducing large-scale turbines near the shoreline would create an industrial presence that is both continuous and dominant, fundamentally changing this character and leading to a permanent and irreversible transformation of the landscape.

Furthermore, the application fails to adequately depict the extent of visual change. Given their scale and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This would negatively affect visual amenity and undermine the essential qualities of naturalness and remoteness. The assessment does not effectively convey the significance of this impact within such a sensitive landscape context.

Methodological issues also arise concerning how visual viewpoints were chosen and presented. Evidence suggests that some viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, especially regarding critical cultural heritage sites and valued landscapes. This raises concerns that the visual impact's magnitude may have been understated, which in turn compromises the reliability of the assessment.

Another notable deficiency is the lack of consideration for the interconnectedness of landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are not isolated; they are part of a broader landscape setting that is visually and spatially linked to the Atlantic horizon. The assessment fails to acknowledge this interdependence, leading to an incomplete understanding of the

impacts on both their setting and cultural significance.

Industrialising the seascape would disrupt these connections, changing how heritage assets are perceived and severing their ties to the natural horizon. This presents not just a visual issue, but also cultural and spatial harm that has not been sufficiently examined in the application.

From a policy standpoint, the proposal contradicts National Planning Framework 4, particularly concerning the safeguarding of natural places and historic assets. The extent of change proposed is inconsistent with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case assessment further undermines any assertion of compliance with policy.

Moreover, the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelming and unavoidable. The resultant change is therefore fundamental and permanent, and not something that could be reduced to an acceptable level through mitigation efforts.

In summary, the assessment fails to accurately depict the scale of impact, the sensitivity of the environment, and the interlinked nature of landscape and heritage. These shortcomings prevent a reliable evaluation and support the conclusion that the proposal is not compatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is notably deficient, lacking the necessary detail to properly evaluate the likely environmental effects. The proposed works involve significant seabed preparation and installation activities within a dynamic Atlantic environment. However, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included in the application. Instead, it relies on mitigation and contingency measures that would be developed after consent, which obstructs any meaningful assessment of their adequacy and effectiveness.

This dependence on undefined future measures is particularly alarming due to the sensitivity of the environment in question. The West Lewis coastline is known for its clean coastal waters and significant habitats, both of which are susceptible to disturbances caused by sediment and contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on how these risks will be prevented, controlled, or monitored.

Furthermore, there is considerable uncertainty regarding the scale and behaviour of sediment plumes that may result from seabed disturbances and cable installations. Without thorough modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also pertains to potential consequences for marine species and habitats that have already been recognised as sensitive in the broader assessment.

Adding to these concerns is the lack of detailed emergency response procedures. By postponing contingency planning until after consent is granted, the application undermines the ability to evaluate whether adequate safeguards are in place for responding to pollution events. This creates procedural risks and hampers the competent authority's ability to assess environmental protection measures prior to determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements established under the Environmental Impact Assessment regime. Significant effects and necessary mitigation must be evaluated prior to granting consent, and without this information, a lawful determination cannot be achieved. Additionally, the application does not demonstrate compliance with relevant policy requirements related to environmental protection and water quality.

In summary, the lack of clearly defined mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts collectively render the assessment materially inadequate. These deficiencies hinder a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal fails to provide a thorough evaluation of the ecological and socio-economic impacts on fisheries and marine life, despite the waters off the West Lewis coast hosting both a vibrant marine ecosystem and a significant fishing industry. The application does not convincingly demonstrate how these critical uses and habitats will be preserved without substantial disruption.

A major concern is the assumption that fishing activity can be relocated without consequences. There is no evidence presented that alternative fishing grounds are available, accessible, or suitable to accommodate increased pressure. This lack of information is critical, as such displacement poses a risk of overfishing in other areas and could have broader economic ramifications for the local fishing fleet. Without a solid, evidence-based assessment, understanding the implications for fisheries and local livelihoods becomes impossible.

The application also introduces considerable risks to marine species due to the anticipated underwater noise from construction activities. The use of high-energy hammer piling over an extended timeframe is expected to cause disturbances that reach large distances, thereby impacting species like dolphins. Concerns arise from the predicted disturbance to a significant portion of the local bottlenose dolphin population, yet the application diminishes the importance of these effects and does so without adequate supporting evidence.

There exists a notable contradiction within the application, where the need for licenses to permit harm to European Protected Species is recognised while simultaneously describing the impacts as negligible. This inconsistency undermines the credibility of the assessment and raises significant concerns regarding adherence to the Habitats Regulations, especially when harm is anticipated at a level that necessitates legal authorisation.

Furthermore, the assessment neglects to address cumulative impacts resulting from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. A comprehensive evaluation of these collective effects is essential, as it directly influences our ability to gauge the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not demonstrate alignment with the National Planning Framework 4 or the National Marine Plan. It fails to show that the proposed development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, obstructing any assertion that the proposal constitutes sustainable development.

In conclusion, the deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions within the application collectively render the assessment incomplete and unreliable. These shortcomings hinder a proper evaluation of the effects on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The evaluation of the onshore infrastructure associated with this project is significantly inadequate and fails to account for the comprehensive impacts linked to what is fundamentally a single integrated initiative. The offshore turbines and the associated onshore works are fundamentally connected, yet they are analysed in isolation, leading to a disjointed approach that conceals the true magnitude of environmental and socio-economic ramifications.

The onshore components entail cabling traversing protected moorland, the establishment of a substation close to Stornoway, and the necessary access infrastructure through delicate landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, a crucial carbon store and ecologically fragile habitat. The application lacks a thorough assessment of these effects, obstructing a complete understanding of the project's overall environmental impact.

By omitting or postponing the assessment of onshore consequences, the application hinders a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all facets of a project be considered collectively, yet the division between offshore and onshore components means the aggregate impacts on peatlands, habitats, and local communities remain unclear.

There are also considerable risks to sensitive habitats, such as machair systems and peatland environments, which enjoy policy protection. The application does not adequately show that impacts on these habitats have been fully evaluated or that suitable avoidance measures have been implemented. This represents a significant evidential deficiency concerning biodiversity protection.

Furthermore, the routing of infrastructure through active croft land presents possible conflicts with existing land use and legal rights. The application fails to provide evidence that the requisite consents or procedures have been initiated, raising doubts about the project's feasibility and lawful execution.

From a policy standpoint, the failure to assess the project in its entirety and to demonstrate the protection of peatlands, habitats, and land use interests conflicts with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further undermines the application.

Collectively, the separation of project elements, the absence of a comprehensive evaluation, and the lack of supporting evidence regarding environmental and land use impacts render this section of the application incomplete and unreliable, preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment fails to include an evaluation of dark skies and nocturnal wildlife, representing a significant omission. The West Lewis coastline is renowned for its exceptionally dark skies, which are integral to the area's environmental quality, cultural identity, and tourism appeal. The proposal introduces permanent red aviation lighting that will be visible over long distances, creating an intrusive "wall of light" effect across the western horizon and fundamentally transforming the night-time

environment.

This proposal lacks an assessment of the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors, which is particularly concerning given the importance of dark skies to the region's identity and to the growth of sectors such as astro-tourism. The absence of consideration for these impacts indicates a clear gap in the overall landscape and environmental analysis.

Moreover, the application does not evaluate the effects on nocturnal wildlife. Certain species, including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, are particularly vulnerable to artificial lighting due to their sensitivity to phototaxis, which can cause disorientation and increase the risk of collisions. Without a lighting impact assessment or a study on phototaxis, the application fails to determine how the proposed aviation lighting might affect these species or contribute to increased mortality rates.

The reliance on daytime survey data in the ornithological assessment further exacerbates this oversight, as it does not account for nocturnal activity or the associated risks. Species such as Kittiwakes, which forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this potential impact has gone unassessed. The lack of site-specific data regarding night-time activity creates a critical gap in understanding the ecological impacts of the proposal.

In the absence of an assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would be adversely affected. The standard of evidence required to exclude adverse effects beyond reasonable scientific doubt is not met, thus necessitating the precautionary principle and impeding a lawful determination.

From a policy standpoint, these omissions contradict the National Planning Framework 4's objectives concerning the protection of natural places and environmental quality. Additionally, they undermine the comprehensive evaluation of landscape and seascape impacts since the character of the night-time environment is a vital aspect of the ecosystem.

In summary, the lack of any assessment regarding dark skies and nocturnal wildlife creates a significant evidential gap. The absence of baseline data, impact modelling, and species-specific analysis renders the application incomplete and unsuitable for a lawful determination.

TOURISM

The economic contribution of tourism to the Isle of Lewis is significant, having grown from £65 million in 2017 to over £81.5 million and supporting more than 1,000 jobs, which accounts for up to 16% of the island's economy. However, the application in question fails to adequately evaluate the tourism impacts, neglecting to assess the economic and social consequences for this vital sector. Despite acknowledging that 86% of visitors are attracted by the area's scenery, there is no quantified analysis of how large-scale offshore infrastructure would influence visitor numbers, behaviour, or overall economic contribution.

Furthermore, the assessment overlooks the crucial role of environmental quality in sustaining tourism, particularly the appeal of unspoiled landscapes and dark skies to the visitor experience. This gap is further exacerbated by the absence of a Dark Skies Assessment, which is essential for understanding the implications for nature-based tourism and astro-tourism, both of which are emerging markets for the area.

In an island community with limited economic diversification, the neglect to assess tourism impacts carries broader implications for employment, local businesses, and the sustainability of the community. The lack of a compliant Island Communities Impact Assessment means these economic vulnerabilities, as mandated by the Islands (Scotland) Act 2018, have not been properly evaluated.

Moreover, from a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, particularly concerning economic impact and the necessity to show net benefits. It conflicts with strategic objectives that prioritise tourism as a growth sector and fails to provide sufficient evidence for the competent authority to assess the economic consequences of the proposal.

In summary, the deficiencies in quantifying tourism impacts, assessing the environmental drivers of visitor behaviour, and considering the island's economic dependency culminate in a substantial evidential gap. This lack of thorough analysis inhibits a robust evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails fundamentally to meet the requirements for sustainable development as mandated by statutory duties, national policy, and evidential standards. The application echoes the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. Despite being presented under a stronger policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, it remains deficient.

There are significant gaps in baseline data, reliance on an undefined design envelope, and unspecified mitigation measures. Key impact pathways, including those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism, have been overlooked. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a full understanding of likely significant effects or residual impacts.

Procedural shortcomings are evident, notably the lack of a compliant Island Communities Impact Assessment, which breaches the statutory duty established under the Islands (Scotland) Act 2018. The omission of a full Social Impact Assessment further complicates matters, hindering the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These shortcomings are substantial enough to render the application unfit for determination.

The proposal conflicts directly with National Planning Framework 4, as it does not adequately protect biodiversity, natural places, or cultural heritage. It fails to demonstrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, largely due to the absence of tourism impact modelling. Additionally, the cumulative impact of offshore and onshore components has not been properly assessed, obscuring effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and internally inconsistent. The necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and precluding a lawful determination that impacts are acceptable.

Furthermore, the proposal would lead to substantial and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruptions to cultural and visual relationships, and negative impacts on tourism represent permanent consequences that cannot be mitigated satisfactorily.

Collectively, these issues render the application procedurally and substantively unfit for determination. The significant information deficiencies, combined with policy conflicts and unresolved environmental risks, impede a lawful and evidence-based decision. Therefore, the competent authority must refuse consent on these grounds or enforce the relevant regulatory provisions to obtain the missing information.

In light of these factors, I formally request that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Additional Comments

I am deeply concerned about the way this offshore wind farm has been imposed on the Isle of Lewis, with little meaningful explanation, transparency, or genuine consultation with the communities most directly affected. The process to date has left many residents feeling sidelined and unheard, despite the scale and permanence of the impact these decisions will have on our island.

The consequences of this development are far-reaching and devastating. It threatens to fundamentally alter Lewis as we know it. I question what right Crown Estate Scotland has to award use of the seabed without proper engagement with the communities whose lives, livelihoods, and environment will be directly affected. Equally, Comhairle nan Eilean Siar had no basis to claim there was strong community support when there was no open, inclusive discussion to establish this.

The visual impact alone will permanently damage our unique and internationally valued landscape. Tourism, which is a vital part of our local economy, will be irreversibly affected. Visitors come here for unspoilt scenery, tranquillity, and natural beauty. If tourism declines, a major income stream will be lost, businesses will fail, jobs will disappear, and young people will be forced to leave the island. The long-term consequence is the erosion — and eventual loss — of our communities.

The risks to wildlife are equally alarming. It is deeply troubling that disruption to the natural habitats of rare and protected species could be considered acceptable in any context. These ecosystems are fragile and irreplaceable, and once damaged, they cannot simply be restored.

Crofters and fishermen have worked these lands and seas for generations. This is not only an economic activity, but a way of life rooted in heritage, sustainability, and stewardship of the environment. It is difficult to understand how decisions of this magnitude can be made without even speaking to the communities whose livelihoods and cultural identity are placed at risk.

Construction and associated infrastructure will affect the daily lives of everyone who lives on or visits the island. The cumulative impact threatens the survival of whole communities. Already, the uncertainty and scale of the proposed development are having a measurable negative effect on mental health, as residents worry about the future for themselves, their children, and their grandchildren. This is a generational change that will affect families and communities for decades to come.

Finally, there is a complete lack of clear, tangible evidence demonstrating how this project will benefit our local communities. At present, there is no convincing case that this development serves the people of Lewis in any meaningful way.

Member of Public 221

Objection To Spiorad na Mara Offshore Wind Farm
References: MD-00011742 & MD-00011743

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a thorough review of the Environmental Impact Assessment Report and associated documentation, highlighting material deficiencies related to planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and significant cultural identity. Concerns about the scale, proximity, and design of the proposal raise questions regarding its alignment with statutory requirements, national policy, and the principles of sustainable development.

A significant issue with the application is the lack of a robust evidential basis for a lawful determination. There is a notable absence of critical environmental data, while the baseline information provided is both limited and inconsistent. Many key aspects of the proposal remain undefined. The flexible design framework employed hinders a comprehensive understanding of the likely significant effects, and the reliance on unspecified mitigation measures makes it impossible to assess their effectiveness. Consequently, the documentation fails to furnish a complete or informed understanding of the potential environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack solid evidence.

Furthermore, there are evident and substantial conflicts with policy. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural spaces, cultural heritage, and health and wellbeing. It does not demonstrate that national requirements for the protection of biodiversity, climate interests, and environmental integrity can be satisfied. These conflicts are critical as they directly relate to the statutory tests required for consent and weaken the competent authority's ability to conclude that the development complies with policy.

The scale of the proposal is unprecedented for this location, with large turbines planned to be installed in close proximity to the shoreline, raising significant concerns about landscape capacity, visual dominance, and environmental impact. Collectively, the insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and evident policy non-compliance illustrate that the application is

incomplete and cannot support a lawful determination. In light of these circumstances, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally inadequate, lacking a comprehensive, transparent, and dependable evaluation of the potential environmental repercussions of the proposal. The application utilises a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations. This creates considerable uncertainty and hinders the consistent application of a worst-case scenario, thereby compromising the assessment's integrity. Consequently, the impacts described may not accurately represent the development that would ultimately be constructed, hindering both the public and the competent authority from grasping the true extent of the environmental effects.

Furthermore, the application depends heavily on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent on the premise that any environmental harm will be addressed later prevents any substantial evaluation of their effectiveness or assessment of residual impacts. This postponement of critical information until after consent is granted is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which mandates that likely significant effects and mitigation strategies must be clearly identified prior to any decision-making.

There are also major evidential shortcomings, including deficiencies in baseline data, methodological limitations, and reliance on assumptions rather than site-specific evidence. This leads to uncertainty about the scale and significance of impacts, particularly where negligible or non-significant effects are asserted without robust supporting evidence. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that does not comply with statutory requirements.

As a result, the application does not satisfy the evidential threshold necessary under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Moreover, the proposal fails to prove adherence to National Planning Framework 4, including obligations related to biodiversity protection and environmental integrity, as it cannot demonstrate that impacts have been thoroughly assessed or that suitable safeguards are in place.

In conclusion, the reliance on an ill-defined design envelope, the absence of specified mitigation measures, and the gaps in baseline data render the Environmental Impact

Assessment Report both unreliable and incomplete. These deficiencies preclude a lawful and thorough evaluation of environmental effects, leaving the competent authority unable to make an informed decision based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed development poses serious concerns regarding its impact on marine ecology and protected species within the West Lewis coastal environment, a sensitive and biologically rich area. The assessment provided is significantly lacking, as it fails to deliver a comprehensive and reliable understanding of the ecological receptors present. The baseline data is incomplete, and the methodologies employed are insufficient to accurately capture the presence, behaviour, and habitat use of vital species.

A particularly troubling oversight is the inadequate recognition of otters, classified as a European Protected Species. The application does not appropriately assess their active utilisation of coastal areas for foraging and movement. Without a thorough consideration of their core foraging range and behavioural patterns, the potential impacts from construction-related disturbance, noise, and increased human activity remain unexamined. This gap severely undermines any assertions regarding the lack of significant effects on this species.

Moreover, the assessment of basking sharks suffers from significant shortcomings, primarily due to the reliance on aerial surveys that introduce a considerable detection bias, especially in challenging Atlantic conditions. This methodology is likely to lead to an underestimation of their presence, particularly when juxtaposed with established land-based observations that indicate their frequent use of these waters. The omission of such pertinent data contributes to an incomplete baseline and diminishes the credibility of the findings presented.

These methodological flaws mean that any conclusions indicating negligible or non-significant effects rely more on assumptions than on substantial evidence. The insufficient baseline data also hampers the ability to meaningfully assess cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. Consequently, there is considerable uncertainty regarding the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it has failed to properly identify and assess protected species. This level of uncertainty prevents the ability to rule out adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these

circumstances, granting consent cannot be legally justified.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These significant deficiencies hinder a thorough evaluation of the impacts on marine ecology and protected species and lead to the overall conclusion that the application lacks a solid evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment provided in the application reveals significant gaps in evidence and internal inconsistencies that challenge its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application does not satisfactorily demonstrate that these species will not be adversely affected. The proposed development is situated within crucial foraging areas and migratory pathways, yet the assessment fails to rigorously analyse the potential impacts of displacement, collision risk, or habitat loss.

There exists a fundamental contradiction within the application itself, as the developer asserts no significant adverse effects while simultaneously presenting a Habitats Regulations derogation case, which is necessitated only when significant harm is anticipated. This inconsistency raises serious concerns regarding the reliability of the assessment and suggests that the conclusions are not substantiated by the underlying evidence.

Moreover, the assessment does not adequately establish that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The critical importance of these feeding grounds is insufficiently acknowledged, and the reliance on modelling approaches introduces further uncertainty, particularly concerning species experiencing severe population declines like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, especially given the incomplete baseline data and the lack of comprehensive understanding of behavioural responses.

The placement of turbines within an established migratory corridor adds a further layer of significant risk, effectively creating a barrier along a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term consequences of sustained mortality within this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application does not meet the necessary evidential threshold to confirm that there will be no adverse effects on the integrity of protected

sites. The presence of contradictory conclusions, in conjunction with gaps in data and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This situation engages the precautionary principle and precludes a lawful conclusion supporting consent.

Ultimately, the deficiencies identified in the assessment signify non-compliance with National Planning Framework 4, particularly regarding biodiversity protection and the safeguarding of natural assets. The failure to demonstrate that internationally important seabird populations will not be adversely affected directly contravenes national policy. Collectively, these factors render the assessment unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence, culminating in the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the development's impact on cultural heritage and community identity is fundamentally flawed, as it overlooks the West Lewis coastline's significance as a living cultural landscape that interlinks environment, language, tradition, and community. By adopting a narrow perspective, the application treats heritage as a collection of isolated, static features instead of recognising their dynamic social, cultural, and spiritual roles within the community.

A significant shortcoming of the assessment is its inadequate treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice; however, they are mischaracterised as static features. This neglect of their ongoing use and significance leads to an incomplete understanding of cultural effects and dismisses their importance to community life.

Additionally, the assessment fails to account for intangible cultural heritage, such as the Gaelic language and the traditions that have fostered a deep connection between the community and the coastal environment. These vital components are essential to the area's identity yet are conspicuously absent from the assessment, highlighting a considerable oversight. Without recognising these elements, it is impossible to fully comprehend the cultural impact of the proposed development.

Concerns regarding community rights and engagement further complicate the situation. The Gaelic-speaking population embodies a distinct cultural identity, akin to that of Indigenous Peoples, yet the lack of Free, Prior and Informed Consent processes undermines the assessment's validity. This failure to engage meaningfully with the community compromises the integrity of the evaluation and neglects established

participatory principles concerning cultural and environmental matters.

Moreover, the absence of a compliant Island Communities Impact Assessment, required by the Islands (Scotland) Act 2018, represents a critical procedural failure. This assessment is essential for the competent authority to meet its legal obligation to assess social, cultural, and economic impacts on the island community. Its omission alone precludes a lawful determination.

From a policy standpoint, these shortcomings directly conflict with the National Planning Framework 4, especially regarding the protection of historic assets and places. The disregard for both tangible and intangible heritage and the failure to acknowledge living cultural practices constitute a significant deviation from established policy requirements.

In summary, the neglect of living heritage, intangible cultural values, community rights, and adherence to statutory obligations leads to a substantial evidential gap. The cultural impacts of the development remain inadequately assessed, and the application does not furnish a sufficient foundation for evaluating the genuine cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's failure to publish the full Social Impact Assessment is a significant evidential gap that hinders both public understanding and the ability of the competent authority to evaluate the potential social risks associated with the proposal. While the developer did commission this assessment, which included focus groups with local residents, the lack of transparency surrounding its findings raises serious concerns.

Available summaries highlight that residents are already feeling measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts are based on direct engagement and are not speculative. However, without access to the complete assessment, there is an impediment to properly scrutinising the findings and understanding their significance within the context of decision-making.

Moreover, there is evidence suggesting that the proposal is seen as a direct threat to community identity and cohesion, with “cultural loss” noted in the developer’s own findings. Yet, these impacts have not been adequately incorporated into the main application or assigned appropriate weight. The withholding of the full Social Impact Assessment obscures the true human and social costs linked to the development.

This lack of transparency also undermines the Environmental Impact Assessment

process. A thorough understanding of the social, economic, and health impacts is crucial for developments of this magnitude, especially where community character and functioning are at stake. The absence of the full dataset means that the application does not provide a complete evidential basis for assessing the balance between benefits and harms.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. It is essential for development to support positive health outcomes and avoid harm, yet the evidence available indicates existing adverse effects that have not been fully disclosed. Without the full assessment, compliance with this policy remains unproven.

The procedural implications are significant, as the competent authority cannot conduct a comprehensive socio-economic and health evaluation without the full Social Impact Assessment. This represents a material omission within the application and a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing adverse impacts, results in an incomplete and unreliable evaluation. This situation hampers a lawful determination and reinforces the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed introduction of large-scale turbines near the West Lewis coastline would lead to a continuous industrial presence, fundamentally changing the area's character defined by its open Atlantic horizon and undeveloped nature. This alteration would result in a permanent transformation of the landscape, which has not been adequately assessed in terms of visual impacts.

The application fails to represent the magnitude of the visual change. The close proximity and scale of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, impacting visual amenity and diminishing the naturalness and sense of remoteness in this sensitive landscape. The assessment does not convey the level of this impact or its significance adequately.

Concerns also arise regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that some viewpoints may not represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This could result in an understatement of the visual impacts, calling the reliability of the assessment into question.

Another deficiency is the lack of evaluation regarding the interconnectedness of landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape that visually and spatially relates to the Atlantic horizon. Instead of recognising this interdependence, the assessment treats these sites as isolated, resulting in an incomplete evaluation of the impact on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and severing their connection to the natural horizon. This signifies not only a visual impact but also a broader cultural and spatial harm that has not been thoroughly assessed in the application.

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4 concerning the protection of natural places and historic assets. The anticipated changes are incompatible with safeguarding landscape character, visual amenity, and the setting of culturally significant sites. Moreover, the lack of a comprehensive worst-case assessment further undermines claims of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. The turbines' scale, height, and proximity would ensure their presence is dominant and unavoidable. The resulting changes would thus be fundamental and permanent, rather than something that can be reduced to an acceptable level through mitigation measures.

In summary, the assessment does not accurately reflect the scale of impact, the sensitivity of the environment, or the interconnected nature of landscape and heritage. These shortcomings hinder a reliable evaluation and support the conclusion that the proposal is incompatible with the protection of the landscape.

CONSTRUCTION AND POLLUTION RISKS

The absence of detailed management plans, along with undefined mitigation measures, renders the assessment of construction and pollution risks materially deficient. The proposal involves significant seabed preparation and installation activities within a high-energy Atlantic environment, yet there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included. Instead, the application relies on future mitigation and contingency measures to be formulated post-consent, which hinders any meaningful evaluation of their adequacy or effectiveness.

This reliance on unspecified future actions is particularly concerning given the sensitivity of the receiving environment. The West Lewis coastline, known for its clean

coastal waters and important habitats, is vulnerable to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on preventative, control, or monitoring measures for these risks.

Further uncertainty exists regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also pertains to potential effects on marine species and habitats already identified as sensitive within the broader assessment.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent is granted, the application obstructs the evaluation of whether suitable safeguards are established to address pollution incidents. This not only introduces procedural risk but also undermines the ability of the competent authority to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. Significant effects and proposed mitigation measures must be assessed prior to consent; the absence of such information precludes a lawful determination. Furthermore, the application does not demonstrate compliance with policy requirements pertaining to environmental protection and water quality.

In summary, the deficiencies noted in the application—the lack of defined mitigation measures, insufficient detail in management plans, and uncertainty surrounding potential impacts—strongly indicate that a robust evaluation of construction and pollution risks is not feasible, leading to the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment of fisheries and marine life associated with the application lacks sufficient depth, failing to provide a robust evaluation of both ecological and socio-economic impacts. The area off the West Lewis coast is home to a diverse marine ecosystem and supports an active fishing industry. However, the proposal does not adequately demonstrate the protection and maintenance of these vital uses and habitats without significant disruption.

A critical concern is the assumption made within the application regarding the

displacement of fishing activity, which is presented as a feasible option without acknowledging potential consequences. There is no evidence provided to support the availability, accessibility, or capacity of alternative fishing grounds to accommodate any increased pressure. This significant omission raises concerns about overfishing in other areas and may have broader economic repercussions for the local fishing fleet. Consequently, without a clear and evidence-based assessment, the impacts on fisheries and the livelihoods they support remain poorly understood.

Furthermore, the proposal introduces considerable risks to marine species, especially from the underwater noise generated during construction activities. The anticipated high-energy hammer piling over an extended period is likely to cause disturbances over large distances, potentially affecting species such as dolphins. The forecasted disturbance to a substantial portion of the local bottlenose dolphin population is particularly alarming; yet, the application minimises the significance of these effects without adequate supporting evidence.

There is an evident inconsistency in the application, wherein the requirement for licences to permit harm to European Protected Species is acknowledged while simultaneously describing the impacts as negligible. This contradiction raises concerns about the credibility of the assessment and compliance with the Habitats Regulations, especially when harm is anticipated to an extent that requires legal authorisation.

Additionally, the assessment neglects to consider the cumulative impacts resulting from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough evaluation of these interconnected effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not illustrate that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thus preventing any conclusion that the proposal represents sustainable development.

In summary, the deficiencies in the assessment, including the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies, render it incomplete and unreliable. These shortcomings hinder a comprehensive evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed project includes significant onshore infrastructure, yet the assessment of these elements is materially incomplete, failing to consider the full extent of impacts arising from this single integrated project. The onshore works, which encompass cabling across protected moorland and the construction of a substation near Stornoway, are linked intrinsically to the offshore turbines. However, these components have been assessed separately, resulting in a fragmented approach that obscures the true scale of environmental and socio-economic effects.

Excavation across areas of deep peat, particularly within Barvas Moor, poses a threat to a significant carbon store and an ecologically sensitive habitat. The application does not provide a comprehensive assessment of these impacts, which prevents a full understanding of the project's overall environmental footprint. By excluding or deferring the evaluation of onshore impacts, the application inhibits proper assessment of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project be considered collectively; yet, the separation of offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities are not fully understood.

Concerns also arise regarding significant risks to sensitive habitats, including machair systems and peatland environments that are subject to policy protection. The application does not demonstrate that the impacts on these habitats have been fully assessed or that appropriate avoidance measures have been implemented. This omission creates a clear evidential gap concerning biodiversity protection. Furthermore, the disturbance of peatland could lead to the release of stored carbon, potentially resulting in a carbon debt that contradicts the goals of renewable energy development. The application inadequately addresses this issue and fails to show that the overall carbon balance remains beneficial.

Additionally, routing infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. There is insufficient evidence in the application that the necessary consents or processes have been initiated, which raises questions about deliverability and lawful implementation. From a policy perspective, the failure to assess the project as a whole and to demonstrate the protection of peatlands, habitats, and land use interests is in conflict with the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be avoided or mitigated further undermines the application.

In summary, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts render this portion of the application incomplete and unreliable, preventing a lawful determination.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the necessary standards for sustainable development when evaluated against national policy, statutory duties, and evidential standards. It brings back the primary concerns that resulted in the rejection of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the level of industrialisation. This current application is submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

However, the application lacks a complete and trustworthy evidential basis for evaluation. There are significant gaps in baseline data, the design envelope is not clearly defined, and there is an over-reliance on unspecified mitigation measures. Furthermore, important impact pathways, such as those related to nocturnal wildlife, comprehensive onshore infrastructure, and tourism implications, have been excluded. Consequently, the Environmental Impact Assessment is not thorough enough to fully understand potential significant effects or remaining impacts.

Moreover, the process has clear procedural shortcomings. The failure to provide a compliant Island Communities Impact Assessment breaches statutory duties as outlined in the Islands (Scotland) Act 2018, and the lack of a complete Social Impact Assessment is a significant omission. These issues hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for consideration.

The proposal is also at odds with National Planning Framework 4. It does not adequately protect biodiversity, natural areas, or cultural heritage, fails to demonstrate acceptable health and wellbeing impacts, and cannot prove a net economic benefit due to the lack of tourism impact assessments. The cumulative effects of both offshore and onshore components have not been adequately evaluated, masking potential consequences for peatlands, carbon balance, habitats, and crofting land.

Uncertainty surrounds environmental risks, which may be significant. Assessments of marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some areas, inconsistent. The required evidential threshold to rule out adverse effects with reasonable scientific certainty has not been satisfied, invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

Additionally, the proposal would cause considerable and irreversible changes to a highly sensitive landscape. Industrialising the Atlantic-facing coastline, losing dark

skies, disrupting cultural and visual connections, and negatively affecting tourism represent permanent impacts that cannot be adequately mitigated.

When considering all these factors, the application is procedurally and substantively unsuitable for determination. The significant gaps in information, along with policy inconsistencies and unresolved environmental risks, obstruct a lawful, evidence-based decision. The competent authority should either refuse consent on these bases or employ the appropriate regulatory measures to obtain the missing information.

Therefore, a formal request is made for the complete refusal of the Spiorad na Mara Offshore Wind Farm application.

Additional Comments

The whole ethos of this island will be irrevocably changed by this project. In an area which has remained untouched for thousands of years the environmental and aesthetic impact will have a drastic effect.

Member of Public 222

Objection To Spiorad na Mara Offshore Wind Farm
References: MD-00011742 & MD-00011743

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a review of the Environmental Impact Assessment Report and its accompanying documents, highlighting material deficiencies in planning, environmental considerations, cultural impacts, and procedural adherence. The development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. Concerns surrounding the scale, proximity, and design of the proposal raise fundamental questions regarding its alignment with statutory requirements, national policy, and the principles underpinning sustainable development.

The application lacks an adequate evidential foundation necessary for a lawful determination. There are notable gaps in critical environmental data, and the baseline information presented is both limited and inconsistent. Furthermore, key aspects of the proposal remain undefined, and the use of a flexible design framework complicates the understanding of likely significant effects. The reliance on unspecified mitigation measures renders their effectiveness impossible to evaluate. Consequently, the documentation fails to provide a comprehensive or informed understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust evidential support.

Substantive policy conflicts are evident throughout the proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not adequately demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These discrepancies directly affect the statutory tests necessary for consent and undermine the capacity of the competent authority to determine the development's acceptability in policy terms.

The unprecedented scale of the proposal raises significant issues, with large turbines planned in close proximity to the shoreline, which introduces serious concerns about landscape capacity, visual dominance, and overall environmental impact. In summary, the combination of insufficient information, dependence on undefined mitigation

measures, evidential weaknesses, and clear non-compliance with policy illustrates that the application is incomplete and unfit to support a lawful determination. Given these circumstances, it is essential that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary depth and transparency, failing to provide a comprehensive view of the environmental effects related to the proposed development. A flexible Project Design Envelope is employed, which does not commit to specific turbine dimensions, layouts, or configurations. This introduces a considerable degree of uncertainty, undermining the integrity of the assessment and obscuring the true environmental impacts from both the public and the relevant authority. As a result, the actual consequences of the development may not align with what has been presented, preventing a clear understanding of its environmental ramifications.

Moreover, the application depends significantly on unspecified mitigation measures, monitoring strategies, and management plans that have yet to be clearly defined. Seeking consent based on the promise of addressing environmental harm later is procedurally inappropriate. This approach undermines the core purpose of the Environmental Impact Assessment regime, which mandates that potential significant effects and necessary mitigation should be thoroughly established prior to any determination.

The report is further compromised by substantial evidential deficiencies, including a lack of baseline data, methodological limitations, and an over-reliance on assumptions instead of site-specific evidence. These gaps lead to uncertainty about the magnitude and significance of impacts, particularly when claims of negligible or non-significant effects are made without adequate supporting data. The insufficiency of information impedes a thorough understanding of cumulative and worst-case impacts, resulting in scientific uncertainty that is incompatible with statutory obligations.

Consequently, the application does not satisfy the evidential threshold necessary under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This situation necessitates the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate adherence to the National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it has not been shown that impacts have been thoroughly evaluated or that adequate safeguards are in place.

In summary, the reliance on an undefined design envelope, the absence of specific mitigation measures, and the gaps in baseline data render the Environmental Impact

Assessment Report both unreliable and incomplete. These shortcomings obstruct a lawful and robust evaluation of environmental effects, leaving the competent authority unable to make an informed determination based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is inadequate and fails to deliver a thorough understanding of the ecological receptors in the West Lewis coastal environment. This area is a sensitive and biologically rich marine system, yet the data gathered is incomplete and the methods used do not effectively capture the presence, behaviour, and habitat use of species. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

Notably, there is a significant oversight concerning otters, which are a European Protected Species. The application does not adequately acknowledge or evaluate their use of coastal regions for foraging and movement. This oversight of their core foraging range and behavioural patterns results in an insufficient assessment of how construction disturbance, noise, and increased activity could potentially affect them. Such deficiencies undermine any claims regarding the lack of significant effects on this species.

The assessment of basking sharks also shows significant flaws. The reliance on aerial surveys creates a notable detection bias, particularly in Atlantic conditions, likely leading to an underestimation of their presence. This is especially evident when compared to established land-based observations that indicate these waters are frequently used by basking sharks. By not incorporating or properly considering this data, the assessment presents an incomplete baseline and diminishes the reliability of its conclusions.

The methodological shortcomings mean that claims of negligible or non-significant effects are based on assumptions rather than on strong evidence. The lack of adequate baseline data inhibits a meaningful evaluation of cumulative and indirect impacts, including seasonal changes and broader ecosystem interactions. This uncertainty clouds the true scale of risk to marine species and habitats.

Regulatory requirements outlined in the Environmental Impact Assessment regime and National Planning Framework 4 are not met by the application, as it fails to properly identify or assess protected species. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Therefore, consent cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and

unsupported conclusions renders the assessment unreliable. These issues hinder a thorough evaluation of impacts on marine ecology and protected species and contribute to the overall assertion that the application lacks a sufficient evidential foundation.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is seriously lacking. It does not acknowledge the West Lewis coastline as a living cultural landscape where environment, language, tradition, and community are closely interconnected. Instead, the application simplifies heritage, viewing it as a collection of isolated, unchanging assets. This perspective ignores the ongoing social, cultural, and spiritual functions these elements have within the community.

A significant shortcoming is the handling of culturally significant sites like the cemeteries at Dalmore, Bragar, and Barvas. These places are active sites of burial and spiritual practice; however, the assessment wrongly categorises them as static features. It fails to take into account their continued use and the impact of development on their surroundings. Such mischaracterisation leads to an incomplete understanding of cultural effects and neglects their importance to community life.

Moreover, intangible cultural heritage is overlooked. Elements such as the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment are vital to the area's identity yet are entirely absent from the assessment. This gap means the cultural impact of the proposed development cannot be fully understood.

Community rights and engagement also raise concerns. The Gaelic-speaking population embodies a distinct cultural identity with characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the assessment's validity and disregards established principles of participation in decisions affecting cultural and environmental interests.

Furthermore, there is a critical procedural failure, as a compliant Island Communities Impact Assessment, mandated by the Islands (Scotland) Act 2018, has not been conducted. Without this assessment, the competent authority cannot legally evaluate the social, cultural, and economic impacts on the island community. This omission alone renders any determination of the proposal unlawful.

From a policy standpoint, these failures conflict with National Planning Framework 4, particularly regarding the protection of historic assets and places. The neglect to

consider both tangible and intangible heritage and to recognise living cultural practices marks a clear deviation from policy requirements.

When viewed collectively, the shortcomings in assessing living heritage, intangible cultural value, community rights, and statutory obligations create a substantial evidential gap. The cultural impacts of the development remain unassessed, and the application does not offer a solid foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's commissioned Social Impact Assessment, which included focus groups with local residents, has not had its full report published, creating a significant evidential gap. This deficiency hinders both public understanding and the competent authority's ability to evaluate the full extent of social risks identified through the developer's research. Available summaries suggest that residents are already experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These reported impacts stem from direct engagement with the community, affirming their validity rather than being speculative in nature. However, without access to the complete assessment, proper scrutiny of these findings is impossible, limiting the determination of their significance in the decision-making process.

Moreover, there is evidence to suggest that the proposal threatens community identity and cohesion, with the developer's own findings highlighting "cultural loss." Despite this acknowledgement, these impacts have not been adequately integrated into the main application or assigned appropriate weight. The decision to withhold the full Social Impact Assessment obscures the true human and social costs associated with the development. This lack of transparency fundamentally undermines the Environmental Impact Assessment process, as a thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly where community character may be jeopardised.

From a policy standpoint, the application fails to demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. It is essential for developments to support positive health outcomes and mitigate harm, yet the available evidence points to existing adverse effects that remain undisclosed. Consequently, without the full assessment, the application cannot show compliance with this policy.

The procedural ramifications are considerable, as the competent authority cannot conduct a rigorous socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This represents a material omission in the

application and signifies a failure to meet the evidential standards required under the Environmental Impact Assessment regime. Collectively, the failure to disclose the full Social Impact Assessment, along with the evidence of existing adverse impacts, renders the assessment both incomplete and unreliable, preventing a lawful determination and reinforcing the conclusion that the application is unsupported by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual, landscape, and seascape impacts is significantly lacking and does not adequately capture the degree of change or the sensitivity of the environment. The coastline of West Lewis is characterised by its open Atlantic horizon, its undeveloped nature, and a strong sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the shore would create a continuous industrial presence, fundamentally altering this character and leading to a permanent transformation of the landscape.

The application fails to represent the extent of the visual change. Given their scale and closeness, the turbines would dominate the views from residential areas, historic sites, and popular coastal locations. This would have a direct impact on visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not convey the level of this impact or its significance within the context of such a sensitive landscape.

There are also concerns regarding the methodology used for selecting and presenting visual viewpoints. Evidence indicates that the viewpoints may not fully reflect the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and valued landscapes. This raises the possibility that the visual impact may have been understated, undermining the assessment's reliability.

Additionally, the assessment does not consider the interconnected relationships between landscape, seascape, and cultural heritage. Significant sites, including the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape connected through visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as isolated, rather than acknowledging their interdependence, which leads to an incomplete evaluation of the impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are perceived and severing their connection to the natural horizon. This represents not just a visual impact but also a more extensive cultural and spatial harm that has not been sufficiently evaluated within the

application.

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4 regarding the safeguarding of natural places and historic assets. The extent of change is inconsistent with the requirement to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further undermines any claim of compliance with policy.

It is evident that the identified impacts cannot be effectively mitigated. Given the size, height, and proximity of the turbines, their presence would be dominant and inescapable. Consequently, the resulting change is fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation measures.

In summary, the assessment does not accurately reflect the scale of impact, the sensitivity of the environment, or the interconnected nature of the landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the standards of sustainable development as mandated by statutory duties and national policy. It echoes the principal issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application does not address these concerns adequately.

There are significant gaps in the evidential basis provided for the application. The reliance on an undefined design envelope, unspecified mitigation measures, and the lack of crucial impact assessments, such as those affecting nocturnal wildlife, complete onshore infrastructure, and tourism, renders the Environmental Impact Assessment incomplete. This inadequacy impedes a thorough understanding of the potential significant effects and residual impacts associated with the project.

Moreover, procedural shortcomings are evident, notably the absence of a compliant Island Communities Impact Assessment, which violates statutory requirements under the Islands (Scotland) Act 2018. The non-disclosure of a complete Social Impact Assessment is another critical omission. These failures hinder the competent authority’s ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal is also misaligned with the National Planning Framework 4. It does not demonstrate the necessary protections for biodiversity, natural environments, and cultural heritage, nor does it show that health and wellbeing impacts are manageable. Furthermore, the lack of tourism impact modelling means that a net economic benefit cannot be substantiated. The cumulative impacts of both offshore and onshore components have not been properly evaluated, obscuring their effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties regarding environmental risks persist, with incomplete assessments concerning marine ecology, seabirds, protected species, and marine mammals. The evidential threshold needed to demonstrate the absence of adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle. This failure prevents a lawful determination that impacts are acceptable.

The proposed development would also effect substantial and irreversible changes to a sensitive landscape. The industrialisation of the Atlantic-facing coastline, the degradation of dark skies, disruption to cultural and visual connections, and adverse impacts on tourism are permanent consequences that cannot be mitigated effectively.

In conclusion, the application is procedurally and substantively unfit for determination. The significant deficiencies in information, coupled with policy discrepancies and unresolved environmental risks, obstruct a lawful and evidence-based decision-making process. The competent authority should therefore refuse consent for the Spiorad na Mara Offshore Wind Farm application in its entirety.

Member of Public 223

Objection To Spiorad na Mara Offshore Wind Farm
References: MD-00011742 & MD-00011743

Dear Sir/Madam

This representation constitutes a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise from the scale, proximity, and design of the proposal, which fundamentally challenge its compatibility with statutory requirements, national policy, and the principles of sustainable development.

A review of the Environmental Impact Assessment Report and supporting documentation reveals significant deficiencies. The application does not provide an adequate evidential basis for a lawful determination, as critical environmental data is absent, and baseline information is both limited and inconsistent. Additionally, many aspects of the proposal remain undefined. The reliance on a flexible design framework complicates the understanding of likely significant effects, while unspecified mitigation measures hinder any assessment of their effectiveness. Consequently, the documentation fails to support an informed understanding of environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust evidence.

Furthermore, there are notable policy conflicts, as the proposal appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This inconsistency is particularly evident in relation to biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These policy conflicts undermine the ability of the competent authority to determine that the development is acceptable within the required policy framework.

The unprecedented scale of the proposal, with large turbines positioned near the shoreline, introduces significant concerns regarding landscape capacity, visual dominance, and environmental impact. Taken together, the lack of sufficient information, dependence on undefined mitigation, evidential weaknesses, and clear policy non-compliance highlight that the application is incomplete and unable to support a lawful determination. In light of these issues, the precautionary principle must apply.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary detail and transparency to reliably account for the potential environmental effects of the proposal. The flexibility allowed by the Project Design Envelope, which does not commit to specific turbine dimensions or layouts, introduces considerable uncertainty. This creates challenges in applying a worst-case scenario consistently, thereby undermining the integrity of the assessment. As a result, the impacts presented may not accurately represent what will ultimately be constructed, leaving both the public and the competent authority unable to understand the true extent of the environmental effects.

Furthermore, the application is overly reliant on mitigation measures, monitoring strategies, and management plans that have not yet been established. Seeking consent based on the assumption that environmental harm will be managed later does not allow for a proper evaluation of effectiveness or the assessment of residual impacts. This postponement of crucial information until post-consent stages is procedurally unacceptable and contradicts the intended purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies must be clearly identified before any determination is made.

Additionally, there are serious evidential deficiencies present, including insufficient baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This leads to uncertainty about the scale and significance of impacts, especially where the assessment concludes that effects are negligible or non-significant without robust supporting data. The lack of adequate information hampers the understanding of cumulative and worst-case impacts, introducing scientific uncertainty that fails to meet statutory requirements.

Consequently, the application does not satisfy the evidential threshold required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. The proposal also does not comply with National Planning Framework 4, which includes obligations related to biodiversity protection and environmental integrity, as it cannot be demonstrated that the impacts have been fully assessed or that suitable safeguards are in place.

In summary, the combination of an undefined design envelope, the lack of specified mitigation, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings hinder a lawful and thorough assessment of environmental effects, preventing the competent authority from making a determination based on the information submitted.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives in the application is fundamentally insufficient, failing to adhere to the statutory requirements of the Environmental Impact Assessment regime. It does not provide a structured and reasoned comparison of realistic alternatives based on environmental impacts; instead, it offers a narrative of the project's development. This approach does not adequately show that the developer has identified, assessed, and selected less harmful options over more damaging solutions.

There is an evident lack of transparent and evidence-based comparisons of alternative offshore locations, development scales, or design configurations. Notably, the application does not indicate that the developer has seriously considered the possibility of placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts could be minimised. Considering the sensitivity of the West Lewis coastline and the critical role that proximity to shore plays in determining impact, the absence of such analysis raises significant concerns about the siting decision's potential to be the least damaging option.

Further deficiencies are present in the cable routing and landfall assessment, as there is inadequate evidence showing that alternative routes have been thoroughly investigated to avoid or reduce impacts on sensitive receptors, including areas of cultural and spiritual significance such as Barvas Cemetery. The lack of a clear avoidance strategy and a comparative analysis suggests that mitigation through design has not been implemented, relying instead on measures that would come into effect post-design.

Consequently, the application fails to establish that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This situation indicates a failure to adhere to the established mitigation hierarchy, which in turn hampers the competent authority's ability to evaluate whether less harmful and more suitable alternatives are available. Without a thorough assessment of alternatives, it cannot be concluded that the proposal is a sustainable or compliant solution within policy frameworks.

From a policy standpoint, this inadequacy compromises compliance with National Planning Framework 4, especially concerning the protection of natural environments, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment constitutes a material omission that contributes to the overarching conclusion that the application has not been sufficiently evaluated and is not capable of supporting a lawful decision.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline embodies a living cultural landscape where the environment, language, tradition, and community are deeply intertwined. However, the current assessment of cultural heritage and community identity is fundamentally inadequate, treating heritage as a collection of isolated, static assets rather than recognising their ongoing social, cultural, and spiritual functions within the community.

An essential oversight is evident in how the assessment addresses culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active places of burial and spiritual practice, yet are mischaracterised as static features. This neglect fails to acknowledge their continued use and meaning, as well as the detrimental impact that development could have on their settings. This misrepresentation leads to a partial evaluation of cultural effects and ignores their vital role in community life.

Moreover, the assessment completely overlooks intangible cultural heritage, such as the Gaelic language, local traditions, and the profound connection between the community and the coastal environment. These aspects are fundamental to the area's identity, yet they remain unaddressed in the evaluation, creating a significant gap in understanding the cultural implications of the proposed development.

There are also pressing concerns regarding community rights and engagement. The Gaelic-speaking population, which possesses a distinct cultural identity with characteristics of an Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the validity of the assessment and neglects established principles regarding participation in decisions that impact cultural and environmental interests.

Further compounding these issues is the critical absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The failure to conduct this assessment means that the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission is significant enough to render any determination unlawful.

From a policy standpoint, these deficiencies place the proposal at odds with the National Planning Framework 4, particularly concerning the protection of historic assets and places. The neglect to consider both tangible and intangible heritage, as well as the disregard for living cultural practices, signifies a clear deviation from policy requirements.

Taken as a whole, the failure to adequately assess living heritage, intangible cultural

value, community rights, and statutory obligations creates a substantial evidential gap. The cultural impacts of the development remain unexamined, leading to the conclusion that the application lacks a solid foundation for evaluating the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's commissioned Social Impact Assessment, which included focus groups with local residents, has not been fully published. This lack of transparency represents a significant evidential gap that hinders both public understanding and the competent authority's evaluation of social risks identified in the developer's research.

Residents are already reporting measurable stress, anxiety, and concern as a direct result of the scale and proximity of the proposal. These impacts arise from direct engagement with the community and are not speculative in nature. However, the withholding of the complete assessment limits scrutiny of these findings and obstructs the determination of their significance in the decision-making process.

Furthermore, there is evidence indicating that the proposal is viewed as a direct threat to community identity and cohesion, with references to "cultural loss" appearing in the developer’s own findings. Despite this recognition, the main application has not fully integrated these impacts or assigned them the appropriate weight. The absence of the full Social Impact Assessment conceals the true social and human costs associated with the development.

This lack of transparency has serious implications for the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health impacts is critical for developments of this magnitude, particularly when they may affect community character and functioning. The failure to provide the complete dataset means the application does not offer a thorough evidential basis to assess the balance between benefits and harm.

From a policy perspective, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and mitigate harm, yet the evidence available suggests existing adverse effects that have not been adequately disclosed. Without the complete assessment, it is impossible to confirm compliance with this policy.

The procedural implications of this non-disclosure are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This omission represents a material shortcoming in the application, failing to meet the evidential standards

required by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, alongside documented adverse impacts, renders the assessment both incomplete and unreliable. This reality prevents a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual, landscape, and seascape impacts is significantly flawed and does not sufficiently capture the extent of change or the sensitivity of the surrounding environment. The West Lewis coastline is characterised by its open Atlantic views, undeveloped nature, and strong remoteness. The proposed large-scale turbines, which would be located near the shoreline, would introduce a continuous and overwhelming industrial presence that would fundamentally change this character, leading to a permanent and irreversible alteration of the landscape.

The application does not fully represent the scale of this visual change. Given their size and proximity, the turbines would dominate the views from residential areas, historic sites, and popular coastal spots. This dominance would adversely affect visual amenity and diminish the qualities of naturalness and remoteness that define the area. The assessment does not accurately convey the significance of this impact within such a sensitive landscape.

There are also serious methodological issues regarding the chosen visual viewpoints. Evidence suggests that these viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and valued landscapes. This raises concerns that the true extent of the visual impact has been minimised, thereby compromising the assessment's reliability.

Additionally, there is a failure to consider the interconnectedness of landscape, seascape, and cultural heritage. Significant sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape that is visually and spatially linked to the Atlantic horizon. The assessment treats these assets as isolated, neglecting their interrelatedness, which results in an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, changing how heritage assets are perceived and severing their connection to the natural horizon. This represents not just a visual impact, but also a wider cultural and spatial detriment that has not been sufficiently evaluated in the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4 regarding the safeguarding of natural areas and historic assets. The extent of change is incompatible with the need to protect landscape character, visual amenity, and the setting of culturally significant locations. The lack of a robust worst-case assessment further undermines any assertion of policy adherence.

Moreover, it is evident that the identified impacts cannot be effectively mitigated. Due to the height, scale, and closeness of the turbines, their presence would be both dominant and inescapable. The resulting changes are thus fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation.

In summary, the assessment does not accurately represent the magnitude of impact, the sensitivity of the environment, or the interconnected relationship between landscape and heritage. These shortcomings hinder a reliable evaluation and support the conclusion that the proposal is incompatible with the preservation of this landscape.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is fundamentally flawed and does not account for the complete range of impacts associated with what constitutes a single integrated project. The interconnected nature of the offshore turbines and the onshore works has resulted in a fragmented evaluation, obscuring the true extent of the environmental and socio-economic effects.

The elements onshore include cabling that will traverse protected moorland, the construction of a substation in proximity to Stornoway, and the necessary access infrastructure that passes through sensitive landscapes. Notably, these developments involve excavation in areas of deep peat, particularly within Barvas Moor, which is an important carbon store and ecologically delicate habitat. The application falls short of providing a thorough assessment of these impacts, leading to an incomplete understanding of the project's overall environmental footprint.

By neglecting to assess the onshore impacts adequately, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all parts of a project be considered together. However, the disconnection between offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities are not fully articulated.

Moreover, there are considerable risks posed to sensitive habitats such as machair systems and peatland environments, which are afforded policy protection. The application fails to illustrate that impacts on these habitats have been thoroughly

evaluated or that appropriate measures to avoid harm have been instituted. This creates a significant evidential gap concerning biodiversity protection.

Concerns are also raised regarding the carbon balance associated with the proposal. The disturbance of peatland has the potential to release stored carbon, which may lead to a carbon debt that contradicts the aims of renewable energy development. The application does not sufficiently address this concern or show that the overall carbon balance remains advantageous.

Furthermore, routing infrastructure through active croft land poses possible conflicts with existing land use and legal rights. The application does not present evidence that the requisite consents or processes have been initiated, which brings the deliverability and lawful implementation into question.

From a policy standpoint, the inability to assess the project comprehensively and to demonstrate the protection of peatlands, habitats, and land use interests stands in conflict with the National Marine Plan and National Planning Framework 4. The lack of demonstration regarding the avoidance or mitigation of impacts further weakens the application.

In summary, the separation of project components, the absence of an all-encompassing assessment, and the lack of evidence concerning environmental and land use impacts result in this aspect of the application being incomplete and unreliable, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of any assessment regarding dark skies and nocturnal wildlife is a glaring omission within the Environmental Impact Assessment. The West Lewis coastline boasts exceptionally dark skies, which are vital not only for environmental quality but also for cultural identity and tourism. The proposed installation of permanent red aviation lighting would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

Moreover, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This is particularly significant given the increasing importance of dark skies to the area's identity and the growth of tourism sectors such as astro-tourism. Such a failure creates a substantial gap in the overall landscape and environmental evaluation.

Equally concerning is the lack of assessment regarding the impacts on nocturnal wildlife. Species like the Manx Shearwater, European Storm Petrel, and Leach's Storm

Petrel are particularly vulnerable to artificial lighting, which can cause disorientation and increase the risk of collision. The absence of any lighting impact assessment or phototaxis study means that the potential effects of aviation lighting on these species, including potential increases in mortality, have not been considered.

This issue is exacerbated by the reliance on daytime survey data in the ornithological assessment, which overlooks nocturnal activities and the associated risks. Species such as Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this vulnerability has not been assessed. The lack of site-specific night-time data creates a critical gap in understanding the ecological impacts.

Without an assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites might be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt cannot be satisfied, invoking the precautionary principle and obstructing a lawful determination.

From a policy standpoint, this omission contradicts National Planning Framework 4 concerning the protection of natural places and environmental quality. It further undermines the comprehensive assessment of landscape and seascape impacts, as the character of the night-time environment is an integral aspect of the overall ecosystem.

In summary, the lack of any assessment on dark skies and nocturnal wildlife represents a significant evidential gap. The deficiencies in baseline data, impact modelling, and species-specific analysis leave the application incomplete and unable to support a lawful determination.

TOURISM

The omission of a comprehensive analysis of tourism impacts presents a significant gap in the assessment of this application. The tourism sector on the Isle of Lewis plays a crucial role in the local economy, having grown from £65 million in 2017 to over £81.5 million, while supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. However, the application does not adequately evaluate how the proposed large-scale offshore infrastructure might affect visitor numbers, behaviour, or the overall economic contribution of tourism, despite acknowledging that 86% of visitors are attracted by the scenery.

Environmental quality is vital for tourism, and the assessment neglects the essential role of unspoiled landscapes and dark skies in shaping visitor experiences and

emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this deficiency, hindering an understanding of impacts on a recognised and expanding segment of the local economy.

In an island community with limited economic diversification, this failure to assess the implications for tourism has broader consequences for employment, local businesses, and community sustainability. Furthermore, the absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been adequately evaluated, as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not meet the criteria outlined in the National Planning Framework 4, particularly concerning economic impact and the necessity to demonstrate net benefit. It contradicts strategic objectives that prioritise tourism as a growth sector, lacking sufficient evidence for the competent authority to evaluate the economic ramifications of the proposal.

Overall, the failure to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and acknowledge the island's economic dependency culminates in a serious evidential gap. This gap obstructs a thorough evaluation of economic effects and leads to the conclusion that the application remains incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm embodies a significant failure to meet the criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. It echoes the critical issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was a key concern. This current proposal is now presented under a policy framework that should place even greater emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are considerable gaps in the baseline data provided, alongside the use of an undefined design envelope and reliance on unspecified mitigation measures. Important impact pathways have been omitted, such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism implications. Consequently, the Environmental Impact Assessment is deficient and does not allow for a comprehensive understanding of likely significant effects or residual impacts.

Procedural shortcomings are evident as well. The lack of a compliant Island Communities Impact Assessment breaches statutory requirements under the Islands (Scotland) Act 2018, while the failure to provide a complete Social Impact Assessment constitutes a significant omission. These shortcomings hinder the competent

authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

In terms of compliance with National Planning Framework 4, the proposal is fundamentally at odds with requirements. It does not adequately protect biodiversity, natural places, or cultural heritage, fails to demonstrate acceptable health and wellbeing impacts, and lacks evidence of a net economic benefit due to insufficient tourism impact modelling. Furthermore, the cumulative impacts of both offshore and onshore components have not been sufficiently assessed, leading to obscured effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties remain around environmental risks, which could be significant. The assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The evidential threshold necessary to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and hindering a lawful determination that impacts are acceptable.

This proposal would result in extensive and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, loss of dark skies, disruption of cultural and visual relationships, and negative impacts on tourism are permanent effects that cannot be mitigated adequately.

In summary, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, combined with conflicts with policy and unresolved environmental risks, inhibit a lawful, evidence-based decision. The competent authority is urged to refuse consent for this application or to invoke relevant regulatory provisions to compel the submission of the necessary information.

Therefore, I formally request that the application for the Spiorad na Mara Offshore Wind Farm be denied in its entirety.

Additional Comments

My son and his family are committed to leaving the islands if this gets planning permission. I, myself will look to relocate also, should this be granted.

I cannot understand why over 800 objections could be considered as overwhelming evidence that there is community support for these developments. It has always seemed an fait accompli!

The destruction of Lewis in pursuit of profit is loathsome in my mind.

This development has never had community support.

Member of Public 224

Objection To Spiorad na Mara Offshore Wind Farm
References: MD-00011742 & MD-00011743

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection is grounded in an examination of the Environmental Impact Assessment Report and its accompanying documentation, revealing significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. Located off the west side of the Isle of Lewis, the area is characterised by its Atlantic-facing coastline, a near-pristine environment, and a strong cultural identity. Concerns arise from the scale, proximity, and design of the proposed development, which appear incompatible with statutory requirements, national policy, and the principles of sustainable development.

A crucial issue lies in the inadequacy of the evidential basis provided for a lawful determination. Essential environmental data is absent, and the baseline information presented is limited and inconsistent. Moreover, critical aspects of the proposal remain undefined. The flexible design framework utilised obscures the understanding of potentially significant effects, and the reliance on unspecified mitigation measures renders their effectiveness impossible to evaluate. Consequently, the documentation does not facilitate a complete or informed understanding of the potential environmental, cultural, or community impacts. Assertions regarding negligible or non-significant effects lack robust supporting evidence.

Furthermore, there are substantial policy conflicts evident within the proposal. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate that national requirements for the protection of biodiversity, climate interests, and environmental integrity can be satisfied. Such conflicts directly challenge the statutory tests required for consent and compromise the competent authority's capacity to deem the development acceptable in policy terms.

The unprecedented scale of the proposal raises significant concerns regarding landscape capacity, visual dominance, and environmental impact, especially with the positioning of large turbines in close proximity to the shoreline. The combination of inadequate information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance illustrates that the application is incomplete and

incapable of supporting a lawful determination. In light of these issues, the precautionary principle must be applied.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment related to marine ecology and protected species is fundamentally inadequate, failing to deliver a thorough and reliable understanding of the ecological receptors within the West Lewis coastal environment. This area is recognised as a highly sensitive and biologically rich marine system, yet the baseline data provided is incomplete. The methodologies employed do not effectively capture the presence, behaviour, and habitat use of various species, leading to an assessment that does not offer a credible evidential basis for evaluating potential impacts.

Particularly concerning is the omission regarding otters, which are classified as a European Protected Species. The application does not adequately acknowledge or assess their active utilisation of coastal areas for both foraging and movement. Consequently, this oversight results in a lack of analysis concerning their core foraging range and behavioural patterns. The potential impacts from construction disturbance, noise, and increased activity have therefore not been thoroughly evaluated, undermining any assertions made about the absence of significant effects on this species.

Additionally, the assessment of basking sharks presents further shortcomings, as it relies heavily on aerial surveys that introduce considerable detection bias, especially under Atlantic conditions. This methodology is likely to significantly underestimate the presence of basking sharks, especially when compared to established land-based observations that demonstrate their frequent use of these waters. The failure to adequately incorporate or consider such data culminates in an incomplete baseline, thereby diminishing the reliability of the conclusions drawn.

Given these methodological shortcomings, conclusions stating negligible or non-significant effects are based more on assumptions than on solid evidence. The lack of adequate baseline data inhibits a meaningful evaluation of cumulative and indirect impacts, encompassing seasonal variations and broader ecosystem interactions. This introduces uncertainty concerning the true scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the stipulations of the Environmental Impact Assessment regime or the National Planning Framework 4, as it fails to properly identify or assess protected species. The degree of uncertainty generated precludes the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, the

lawful granting of consent is not achievable.

In summary, the presence of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These deficiencies obstruct a comprehensive evaluation of impacts on marine ecology and protected species, leading to the overarching conclusion that the application lacks a sound evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application raises significant concerns regarding its reliability, primarily due to internal inconsistencies and methodological shortcomings. The west coast of the Isle of Lewis is home to internationally important seabird populations that are already experiencing declines, yet the application does not convincingly demonstrate that these species will remain unaffected. Key foraging areas and migratory pathways are directly impacted by the proposed development, but the assessment fails to adequately evaluate crucial factors such as displacement, collision risk, and habitat loss.

There exists a fundamental contradiction within the application. The developer asserts that no significant adverse effects will occur, while simultaneously pursuing a Habitats Regulations derogation case, which is applicable only when significant harm is anticipated. This inconsistency raises doubts about the validity of the assessment and suggests that its conclusions lack adequate evidential support. Furthermore, the assessment does not sufficiently account for the seabirds associated with protected sites like the Lewis Peatlands and St Kilda, and the importance of these feeding grounds remains underrepresented. The reliance on modelling approaches introduces uncertainty, particularly for vulnerable species such as Kittiwakes and Fulmars, as the methodologies employed are likely to underestimate mortality rates, especially when baseline data is lacking and behavioural responses are not fully understood.

The siting of turbines within a recognised migratory corridor presents another considerable risk, creating a barrier along a primary flight path utilised by species migrating between the United Kingdom and Iceland. Long-term implications of sustained mortality in this corridor are not thoroughly assessed, nor are the potential effects on species with relatively small global populations considered.

Regulatory standards demand that evidence demonstrates no adverse effect on the integrity of protected sites, yet this application does not meet the necessary evidential threshold. The presence of contradictory conclusions, coupled with data gaps and modelling deficiencies, prevents a lawful conclusion in support of consent and engages the precautionary principle. Additionally, these deficiencies represent a failure to comply with National Planning Framework 4 concerning biodiversity protection and the

safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

In summary, the assessment is rendered unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. These failings hinder a thorough evaluation of impacts and lead to the conclusion that the application does not meet the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage is seriously flawed, neglecting the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. The application adopts a narrow perspective, viewing heritage merely as a collection of disconnected, static entities instead of recognising their ongoing social, cultural, and spiritual relevance to the community.

The assessment significantly underrepresents culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, which remain active sites for burial and spiritual practices. Instead of acknowledging their ongoing use and significance, the assessment inaccurately categorises them as static features, overlooking how development may impact their surroundings. This mischaracterisation leads to an incomplete understanding of the cultural repercussions and fails to appreciate their importance in community life.

Additionally, there is a striking omission in addressing intangible cultural heritage, which encompasses the Gaelic language, traditional practices, and the long-standing bond between the community and the coastal environment. These aspects are vital to the area's identity yet are entirely absent from the evaluation, representing a major oversight. Without incorporating these factors, the development's cultural impacts cannot be adequately assessed.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, recognised as having a distinct cultural identity akin to Indigenous Peoples, has not been involved in a process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the validity of the assessment and disregards established principles for participation in decisions affecting cultural and environmental matters.

A significant procedural shortcoming is the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. This

omission prevents the competent authority from meeting its legal obligations to assess the social, cultural, and economic impacts on the island community, rendering any determination unlawful.

From a policy standpoint, these shortcomings put the proposal in clear opposition to National Planning Framework 4, particularly regarding the safeguarding of historic assets and places. The failure to consider both tangible and intangible heritage and to acknowledge living cultural practices demonstrates a clear deviation from established policy requirements.

In summary, the neglect of living heritage, intangible cultural values, community rights, and compliance with statutory requirements results in a significant gap in evidence. The cultural impacts of the proposed development have not been thoroughly assessed, and the application lacks a sufficient foundation for determining the genuine cultural costs associated with the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual, landscape, and seascape impacts is significantly flawed, failing to capture both the extent of change and the sensitivity of the environment. The West Lewis coastline is characterised by an expansive Atlantic horizon, a lack of development, and a strong feeling of remoteness. The addition of large-scale turbines near the shore would establish a persistent and overwhelming industrial presence, fundamentally transforming this unique character and leading to a permanent alteration of the landscape.

Moreover, the application does not sufficiently depict the scale of the visual changes anticipated. The size and closeness of the turbines would dominate views from residential areas, historic sites, and popular coastal spots, directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment inadequately conveys the significance of these impacts within such a sensitive landscape.

Methodological issues also arise regarding the choice and presentation of visual viewpoints. Evidence suggests that the viewpoints selected may overlook the most sensitive receptors or fail to address worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This could result in an underestimation of visual impact, calling into question the credibility of the assessment.

Another significant oversight is the lack of evaluation regarding the interconnectedness of landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing

Stones and other Scheduled Monuments exist within a broader landscape setting that visually and spatially relates to the Atlantic horizon. The assessment fails to acknowledge their interdependence, treating them as isolated assets, which leads to an incomplete understanding of the impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these vital relationships, altering the context in which heritage assets are experienced and severing their connection to the natural horizon. This not only constitutes a visual impact but also inflicts broader cultural and spatial damage that has not been thoroughly assessed in the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4 concerning the safeguarding of natural areas and historic assets. The degree of change proposed is inconsistent with the requirement to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertion of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. The size, height, and proximity of the turbines would render their presence dominant and unavoidable. Consequently, the resulting change is fundamental and permanent, rather than being reducible to an acceptable level through mitigation efforts.

In summary, the assessment fails to accurately depict the magnitude of impact, the sensitivity of the environment, and the intertwined nature of landscape and heritage. These shortcomings hinder a dependable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements for sustainable development when evaluated against statutory duties, national policy, and evidential standards. This proposal brings forth the same core issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. It is now presented under an enhanced policy framework, which emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant gaps in the evidence provided for determination. The application lacks a complete baseline data set, utilises an undefined design envelope, and depends on unspecified mitigation measures. Key impact pathways, such as nocturnal wildlife, full onshore infrastructure, and tourism effects, are omitted. Consequently, the Environmental Impact Assessment is incomplete, hindering a thorough understanding

of likely significant effects and residual impacts.

Moreover, procedural shortcomings are evident. The failure to conduct a compliant Island Communities Impact Assessment contravenes statutory obligations under the Islands (Scotland) Act 2018, while the non-disclosure of the complete Social Impact Assessment constitutes a material omission. These deficiencies impede the competent authority from evaluating effects on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Conflicts with the National Planning Framework 4 are apparent in the proposal. It does not adequately demonstrate the protection of biodiversity, natural places, and cultural heritage. Health and wellbeing impacts are not shown to be acceptable, and the absence of tourism impact modelling precludes any evidence of a net economic benefit. The cumulative impact of both offshore and onshore elements has not been assessed properly, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

There are uncertainties surrounding environmental risks that could prove significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and impeding a lawful conclusion on the acceptability of impacts.

The proposal would lead to considerable and irreversible alterations to a particularly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual relationships, and impacts on tourism would yield permanent consequences that cannot be mitigated to an acceptable standard.

In summary, the application is procedurally and substantively inadequate for determination. The vast information deficiencies, combined with policy conflicts and unresolved environmental risks, preclude a lawful and evidence-based decision. The competent authority must refuse consent based on these grounds or invoke the relevant regulatory provisions to compel the submission of the missing information.

Therefore, I formally request that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Additional Comments

I believe strangly that this proposal will be disastrous to the seascape and landscape of the?Western Isles. The natural environment, wildlife and cultural heritage of Lewis will be adversely affected, with knock-on afeverse effects on tourism. This is an inappropriate and unnecessary development and should be refused.

Member of Public 225

Objection To Spiorad na Mara Offshore Wind Farm
References: MD-00011742 & MD-00011743

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under marine licensing and Environmental Impact Assessment regulations. The objection arises from a thorough review of the Environmental Impact Assessment Report and accompanying documentation, highlighting significant deficiencies in planning, environmental considerations, cultural implications, and procedural adherence. The development is situated off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. The proposal's scale, design, and proximity to the shoreline raise serious concerns about its alignment with statutory requirements, national policies, and sustainable development principles.

The application lacks a solid evidential foundation for a lawful determination. There is critical missing environmental data, with limited and inconsistent baseline information, leaving many key elements of the proposal undefined. The use of a flexible design framework obscures the understanding of potential significant effects, and without specific mitigation measures outlined, it is impossible to assess their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidence.

Moreover, there are substantial conflicts with existing policy frameworks. The proposal is at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health and wellbeing. It does not demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts directly impact the statutory tests necessary for consent, compromising the authority's ability to determine that the development aligns with policy standards.

Unprecedented in scale for this location, the proposal features large turbines situated in close proximity to the shoreline, raising considerable concerns about landscape capacity, visual impact, and environmental ramifications. In light of the insufficient information provided, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy violations, it is evident that the application is incomplete

and unfit for a lawful determination. Therefore, the precautionary principle must be invoked in this case.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to offer a comprehensive, transparent, or dependable evaluation of the likely environmental effects associated with the proposal. A critical issue is the adoption of a flexible Project Design Envelope, which lacks fixed turbine dimensions, layouts, or configurations. This introduces considerable uncertainty and hinders the effective application of a worst-case scenario approach, thus compromising the reliability of the assessment. As a result, the impacts reported may not accurately portray what will be constructed, which obstructs both public understanding and the competent authority's ability to grasp the true scale of environmental effects.

There is a heavy reliance on undefined mitigation measures, monitoring strategies, and management plans within the application. Seeking consent based on the premise that environmental damage will be mitigated at a later date is unacceptable, as it inhibits any substantive evaluation of the effectiveness of these measures or an assessment of residual impacts. This postponement of critical information to post-consent stages contravenes the intended purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies be explicitly identified prior to any determination.

Significant evidential gaps are present, including deficiencies in baseline data, methodological limitations, and an over-reliance on assumptions rather than robust site-specific evidence. This lack of comprehensive information generates uncertainty about the scale and significance of impacts, especially when conclusions regarding negligible or non-significant effects are drawn without adequate supporting data. The insufficiency of information hampers the understanding of cumulative and worst-case impacts, resulting in scientific uncertainty that cannot align with statutory obligations.

Consequently, the application does not fulfil the evidential threshold mandated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, which includes requirements related to biodiversity protection and environmental integrity, as it fails to show that impacts have been comprehensively assessed or that suitable safeguards are in place.

In summary, the combination of an undefined design envelope, lack of specified mitigation, and substantial gaps in baseline data renders the Environmental Impact

Assessment Report both unreliable and incomplete. These shortcomings inhibit a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make an informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application presents a significant inadequacy in the assessment of alternatives, failing to satisfy the statutory requirements of the Environmental Impact Assessment regime. It offers a narrative account of project evolution rather than a structured, reasoned comparison of realistic alternatives based on their environmental effects. This method does not demonstrate that less harmful options have been adequately identified, assessed, and selected in favour of more damaging solutions.

A transparent, evidence-based comparison of alternative offshore locations, development scales, or design configurations is notably absent. Specifically, the application does not establish that the developer has seriously contemplated placing turbines further offshore, which would likely reduce visual, ecological, and coastal impacts. Considering the sensitivity of the West Lewis coastline and the crucial role that proximity to the shore plays in determining impact, the lack of such analysis precludes any conclusion that the proposed siting is the least damaging option.

The deficiencies further extend to the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly investigated to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The absence of a clear avoidance strategy and a comparative analysis suggests that mitigation by design has not been utilised, leading to a reliance on post-design mitigation measures.

Consequently, the application fails to show that environmental harm has been minimised through careful site selection, layout, and routing of infrastructure. This represents a failure to adhere to the established mitigation hierarchy and hampers the competent authority's ability to ascertain whether less harmful and more suitable alternatives exist. Without a comprehensive assessment of alternatives, it cannot be concluded that the proposal represents a sustainable or policy-compliant solution.

From a policy standpoint, this inadequacy undermines compliance with National Planning Framework 4, especially concerning the protection of natural places, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a material omission that contributes to the overall conclusion that the application has not undergone sufficient evaluation and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species lacks completeness and reliability in its understanding of the ecological receptors within the West Lewis coastal environment, which is a biologically active and sensitive marine system. The baseline data provided is insufficient, and the methodologies employed do not adequately capture the presence, behaviour, and habitat use of various species. Consequently, the assessment fails to deliver a solid evidential basis for evaluating impacts.

One significant oversight involves otters, a species protected under European law. The application does not sufficiently acknowledge or assess their active utilisation of coastal areas for foraging and movement. The neglect of their core foraging range and behavioural patterns results in an inadequate evaluation of the potential impacts stemming from construction disturbance, noise, and increased human activity. This flaw undermines any claims regarding the absence of significant effects on otters.

Deficiencies are also apparent in the assessment of basking sharks. The reliance on aerial surveys introduces considerable detection bias, particularly under Atlantic weather conditions. This method is likely to lead to an underestimation of their presence when compared to established land-based observations that reveal frequent use of these waters. The failure to incorporate or adequately consider such data contributes to an incomplete baseline, thereby diminishing the reliability of the conclusions reached.

These methodological shortcomings mean that conclusions regarding negligible or non-significant effects are based more on assumptions than on solid evidence. The lack of adequate baseline data also obstructs a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty about the actual level of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not comply with the requirements of the Environmental Impact Assessment regime or the National Planning Framework 4. The failure to properly identify and assess protected species contributes to a level of uncertainty that prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these conditions, consent cannot be granted lawfully.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment untrustworthy. These deficiencies hinder a thorough evaluation of impacts on marine ecology and protected species,

leading to the overall determination that the application lacks a sound evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application fails to meet the necessary evidential standard required to demonstrate that it will not adversely affect internationally important seabird populations. With significant gaps in evidence and internal inconsistencies, the ornithological assessment is fundamentally flawed. This situation is particularly concerning given that the west coast of the Isle of Lewis is home to many seabird species that are already in decline. The assessment does not adequately evaluate the implications of habitat loss, collision risk, or displacement within key foraging areas and migratory pathways.

There is a troubling contradiction in the application: the developer asserts that there will be no significant adverse effects while simultaneously advancing a case for Habitats Regulations derogation. This derogation is only necessary when significant harm is anticipated, which raises doubts about the reliability of the assessment and its conclusions. The evidence provided is insufficient to ensure that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds has not been sufficiently accounted for, and the reliance on modelling methods introduces uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars, where mortality rates may be underestimated.

Moreover, the siting of turbines within a recognised migratory corridor poses an additional risk, potentially creating a barrier along a primary flight path used by species travelling between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor, along with the potential effects on species with relatively small global populations, have not been adequately assessed.

From a regulatory standpoint, the application does not fulfil the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and limitations in modelling, means that the assessment does not meet the standard of beyond reasonable scientific doubt. This situation invokes the precautionary principle and prevents a lawful conclusion in support of consent.

The deficiencies noted also indicate a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

In summary, the unreliability of the assessment, marked by internal inconsistencies,

methodological weaknesses, and insufficient evidence, leads to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is fundamentally inadequate, failing to recognise the West Lewis coastline as a living cultural landscape where environment, language, tradition, and community are intrinsically connected. The application adopts a reductive approach, treating heritage as isolated, static assets rather than acknowledging their ongoing social, cultural, and spiritual function within the community.

A significant deficiency arises from the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet the assessment categorises them merely as static features, neglecting their continued use and the impact of development on their setting. This mischaracterisation leads to an incomplete evaluation of cultural effects and disregards their integral role within community life.

Moreover, the application fails to consider intangible cultural heritage, which includes the Gaelic language, traditions, and the long-standing relationship between the community and the coastal environment. These elements are central to the identity of the area but are entirely absent from the assessment, representing a significant omission. Without addressing these factors, the cultural impact of the development cannot be fully understood.

Concerns about community rights and engagement further exacerbate the situation. The Gaelic-speaking population has a distinct cultural identity recognised as characteristic of Indigenous Peoples; however, no process of Free, Prior and Informed Consent has been undertaken. This lack of meaningful engagement undermines the legitimacy of the assessment and fails to reflect established principles of participation in decisions affecting cultural and environmental interests.

A critical procedural failure is the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone prevents a lawful determination.

From a policy standpoint, these deficiencies place the proposal in direct conflict with National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to consider both tangible and intangible heritage, alongside the

neglect of living cultural practices, signifies a clear departure from policy requirements.

In summary, the lack of assessment regarding living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential gap. The cultural impacts of the development have not been properly assessed, leading to an application that does not provide a sufficient basis for evaluating the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The transparency and comprehensiveness of the assessment regarding social impacts, health, and wellbeing associated with the proposed development are critically lacking. Although the developer has commissioned a Social Impact Assessment that included focus group discussions with local residents, the failure to publish the complete report leads to a significant evidential gap. This lack of disclosure hinders both public understanding and the competent authority's ability to evaluate the potential social risks highlighted in the developer's own findings.

Residents are experiencing measurable stress, anxiety, and concern tied to the size and proximity of the proposal, as indicated by available summaries. These impacts arise from direct community engagement and are not speculative. The absence of the full assessment restricts proper scrutiny of these findings, limiting their significance in the decision-making process.

Moreover, the proposal is viewed as a threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. However, these critical impacts have not been adequately reflected in the main application or given appropriate consideration. The withholding of the complete Social Impact Assessment obscures the genuine human and social costs associated with the development.

This lack of transparency further undermines the Environmental Impact Assessment process. For developments of this magnitude, a thorough understanding of the social, economic, and health implications is vital, especially when the character and functioning of the community may be at stake. Without providing the complete dataset, the application fails to establish a comprehensive evidential basis necessary for weighing the benefits against potential harms.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Developments should foster positive health outcomes and mitigate harm; however, the evidence currently available indicates pre-existing adverse effects that have not been fully disclosed. Without the complete assessment, compliance with this policy remains unproven.

The procedural ramifications are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment, which constitutes a material omission and a failure to meet the evidential standards required by the Environmental Impact Assessment framework.

In conclusion, the non-disclosure of the full Social Impact Assessment, coupled with the evidence of existing negative impacts, renders the assessment incomplete and unreliable. This situation obstructs a lawful determination and supports the assertion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual, seascape, and landscape impacts is significantly lacking and does not sufficiently convey the extent of change or the vulnerability of the surrounding environment. The West Lewis coastline is characterised by its expansive Atlantic views, unspoiled nature, and a profound sense of isolation. The proposed introduction of large-scale turbines near the shoreline would establish a continuous and overwhelming industrial presence, fundamentally altering this character and leading to a permanent and irreversible change to the landscape.

This application fails to adequately depict the scale of the expected visual transformation. The size and closeness of the turbines would dominate the views from residential areas, historic sites, and popular coastal locations. Such alterations would directly affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not accurately reflect the severity of this impact or its importance in the context of a sensitive landscape.

Methodological issues also arise concerning the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not fully capture the most sensitive receptors or the worst-case scenarios, particularly regarding important cultural heritage sites and valuable landscapes. Consequently, there is a risk that the magnitude of visual impact has been underestimated, thereby compromising the credibility of the assessment.

Moreover, a critical oversight is the lack of analysis regarding the interconnected relationship between landscape, seascape, and cultural heritage. Significant sites, such as the Calanais Standing Stones and other Scheduled Monuments, form part of a broader landscape context connected through visual and spatial relationships with the Atlantic horizon. The assessment views these as isolated entities rather than acknowledging their interdependence, leading to an incomplete appraisal of the impacts on their setting and cultural relevance.

The industrialisation of the seascape would sever these vital connections, altering the context in which heritage assets are perceived and disturbing their link to the natural horizon. This signifies not only a visual impact but also a wider cultural and spatial detriment that has not been thoroughly evaluated within the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4 concerning the preservation of natural environments and historic assets. The degree of change is incompatible with the obligation to protect landscape character, visual amenity, and the setting of culturally important sites. The lack of a rigorous worst-case evaluation further weakens any assertion of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelmingly dominant and unavoidable. Thus, the ensuing change is fundamentally permanent and cannot be reduced to an acceptable level through mitigation efforts.

In summary, the assessment fails to accurately reflect the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a dependable evaluation and strengthen the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal's evaluation of construction and pollution risks lacks comprehensiveness, preventing a thorough assessment of its likely environmental impacts. It entails significant seabed preparation and installation works in a challenging Atlantic environment, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application relies on mitigation and contingency measures that are to be formulated after consent is granted, which hinders any meaningful appraisal of their effectiveness.

This reliance on unspecified future measures raises serious concerns, especially given the sensitivity of the receiving environment. The coastline of West Lewis features clean coastal waters and vital habitats that are susceptible to disturbances from sediment and contamination. While the application acknowledges risks like sediment mobilisation and possible chemical or oil spills, it fails to provide adequate details on prevention, control, or monitoring strategies for these risks.

Additionally, there is uncertainty surrounding the scale and behaviour of sediment plumes that may result from seabed disturbances and cable installations. In the absence of robust modelling and well-defined management strategies, it remains

impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty similarly extends to potential repercussions for sensitive marine species and habitats already noted in the broader assessment.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent, the application obstructs the evaluation of whether suitable measures exist to address pollution incidents. This not only introduces procedural risks but also undermines the competent authority's capacity to evaluate environmental protection measures at the determination stage.

From a regulatory standpoint, deferring critical environmental safeguards contradicts the obligations set forth by the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be evaluated prior to granting consent, and without this essential information, a lawful decision cannot be reached. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the absence of defined mitigation strategies, insufficient detailed management plans, and the uncertainty surrounding potential impacts collectively render the assessment materially deficient. These shortcomings hinder a rigorous evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application exhibits a troubling contradiction, as it acknowledges the need for licences to permit harm to European Protected Species while simultaneously claiming that such impacts are negligible. This inconsistency undermines the credibility of the assessment and raises significant concerns regarding adherence to the Habitats Regulations, particularly in instances where potential harm is expected to necessitate legal authorisation.

Moreover, the assessment of fisheries and marine life is notably inadequate, lacking a thorough evaluation of the ecological and socio-economic consequences. The waters off the West Lewis coast are home to both a diverse marine ecosystem and an active fishing industry. However, the application fails to convincingly demonstrate that these essential uses and habitats can be preserved or maintained without considerable disruption.

A critical issue is the presumption that fishing activity can be relocated without repercussions. The application does not provide evidence that alternative fishing grounds are available, accessible, or able to endure added pressure. This significant

omission poses risks of overfishing in other locations, which may lead to broader economic ramifications for the local fishing fleet. In the absence of a clear and evidence-based assessment, the impacts on fisheries and local livelihoods remain inadequately understood.

Additionally, the proposal introduces considerable risks to marine species, especially through the underwater noise generated during construction. The high-energy hammer piling anticipated over an extended timeframe is likely to disturb marine life across considerable distances, affecting species such as dolphins. Concerns arise from the predicted disturbance to a significant portion of the local bottlenose dolphin population, yet the application tends to downplay the importance of these effects without adequate supporting evidence.

The assessment also neglects to consider the cumulative impacts stemming from various pressures, including habitat disturbance, noise, and the displacement of fishing activity. Without a comprehensive evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions remains undetermined.

From a policy standpoint, the application fails to demonstrate compliance with the National Planning Framework 4 or the National Marine Plan. It does not adequately show that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity. This lack of compliance hinders any conclusion that the proposal constitutes sustainable development.

In summary, the deficiencies in the assessment—including the lack of evidence concerning fishing displacement, the underestimation of acoustic impacts, and the internal contradictions—render it incomplete and unreliable. These shortcomings impede a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal raises significant concerns regarding carbon balance. Disturbance of peatland areas releases stored carbon, which could create a carbon debt that undermines the aims of renewable energy development. The application fails to adequately tackle this issue or prove that the overall carbon balance remains positive.

Additionally, the routing of infrastructure through active croft land introduces possible conflicts with existing land use and legal rights. There is a lack of evidence demonstrating that the necessary consents or processes have been initiated, which raises serious doubts about the project's deliverability and lawful implementation.

The assessment of onshore infrastructure is materially incomplete, neglecting the full

extent of impacts stemming from what constitutes a single integrated project. The offshore turbines and onshore works are intrinsically linked but are evaluated separately, resulting in a fragmented approach that obscures the true scale of environmental and socio-economic effects. The onshore components include cabling across protected moorland, construction of a substation near Stornoway, and associated access infrastructure through sensitive landscapes. These works involve excavation across areas of deep peat, particularly within Barvas Moor, which is a critical carbon store and ecologically sensitive habitat. The application does not deliver a thorough assessment of these impacts, thus preventing a complete understanding of the project's overall environmental footprint.

By excluding or deferring the assessment of onshore impacts, the application obstructs proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all elements of a project are considered collectively, yet the separation of offshore and onshore components means that the combined impacts on peatlands, habitats, and communities are not fully grasped.

There are notable risks to sensitive habitats, including machair systems and peatland environments that are subject to policy protection. The application does not show that impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been implemented. This signifies a clear evidential gap in the context of biodiversity protection.

From a policy standpoint, the failure to assess the project as a whole and to demonstrate the protection of peatlands, habitats, and land use interests conflicts with the National Marine Plan and National Planning Framework 4. The inability to prove that impacts can be avoided or mitigated further diminishes the reliability of the application. Collectively, the separation of project components, the lack of comprehensive assessment, and the absence of evidence regarding environmental and land use impacts make this aspect of the application incomplete and unreliable, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is noted for its exceptionally dark skies, which are crucial to the area’s environmental quality, cultural identity, and tourism value. The proposal to introduce permanent red aviation lighting, visible over long distances, would create a continuous and intrusive “wall of light” effect across the western horizon, fundamentally altering the night-time environment.

The Environmental Impact Assessment fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors.

Such omissions are significant, particularly given the growing importance of dark skies to the region's identity and emerging sectors like astro-tourism. The lack of consideration for these impacts leads to a notable gap in the overall landscape and environmental assessment.

Additionally, the application does not assess the potential effects of this lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can cause disorientation and increase the risk of collisions. There is no lighting impact assessment or phototaxis study included in the application, leaving unaddressed how aviation lighting may affect these species or contribute to increased mortality rates.

The reliance on daytime survey data in the ornithological assessment further complicates matters, as it fails to capture nocturnal activity or associated risks. Kittiwakes, which may forage or migrate during the night, are similarly vulnerable to disorientation caused by artificial lighting, yet this risk remains unexamined. Without site-specific night-time data, understanding the ecological impacts becomes severely limited.

The absence of any evaluation of nocturnal impacts prevents a clear determination of whether protected species or designated sites would face adverse effects. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and hindering lawful determination.

From a policy standpoint, these omissions conflict with National Planning Framework 4 concerning the protection of natural places and environmental quality. They also undermine the comprehensive assessment of landscape and seascape impacts, as night-time character is an essential aspect of the environment.

Overall, the lack of assessment concerning dark skies and nocturnal wildlife represents a significant evidential gap. The absence of baseline data, impact modelling, and species-specific analysis renders the application incomplete and unable to support a lawful determination.

TOURISM

The assessment of tourism impacts lacks material depth and does not adequately evaluate the economic and social ramifications for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the region's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness. Although the application notes that 86% of visitors are attracted by the scenery, it fails to provide a quantified evaluation of

how large-scale offshore infrastructure would influence visitor numbers, behaviours, or the overall economic contribution.

Tourism has seen considerable growth, rising from £65 million in 2017 to more than £81.5 million, supporting over 1,000 jobs and representing up to 16% of the island's economy. Nevertheless, the application does not assess how the industrialisation of the seascape and the degradation of environmental quality would impact Tourism Gross Value Added or the broader economic resilience of the area. Without this analysis, it is impossible to determine whether the proposed development would offer a net economic benefit or detract from an established and burgeoning sector.

Furthermore, the assessment neglects to consider the significance of environmental quality in bolstering tourism, particularly the value of unspoiled landscapes and dark skies for visitor experiences, as well as for emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, resulting in a crucial gap in understanding the potential impacts on a recognised and growing segment of the local economy.

In an island community characterised by limited economic diversification, the failure to evaluate tourism impacts has broader consequences for employment, local businesses, and community sustainability. The omission of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been analysed as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly regarding economic impact and the necessity to show net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector, failing to provide adequate evidence for the competent authority to assess the economic implications of the proposal.

Overall, the inability to quantify tourism impacts, assess the environmental factors influencing visitor behaviours, and recognise the island’s economic dependencies creates a significant evidential gap. This hinders a thorough evaluation of economic effects and leads to the conclusion that the application is insufficient.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements for sustainable development as defined by statutory duties, national policy, and evidential standards. It mirrors the critical issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. This current application, however, is

presented within a more stringent policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing.

Significant gaps in the evidential basis for the application hinder its determination. The reliance on an undefined design envelope, unspecified mitigation measures, and the failure to address key impact pathways—including effects on nocturnal wildlife, complete onshore infrastructure, and tourism—renders the Environmental Impact Assessment incomplete. Consequently, it does not provide a full understanding of likely significant effects or residual impacts.

Moreover, there are procedural shortcomings present. The failure to conduct a compliant Island Communities Impact Assessment breaches statutory duties under the Islands (Scotland) Act 2018. Additionally, the lack of a full Social Impact Assessment constitutes a significant omission, preventing the competent authority from evaluating effects on community wellbeing, cultural identity, and economic resilience. These deficiencies are substantial enough to render the application unfit for determination.

The proposal is also at odds with National Planning Framework 4, failing to safeguard biodiversity, natural landscapes, and cultural heritage. It does not demonstrate that health and wellbeing impacts are acceptable, nor does it provide evidence of a net economic benefit, particularly due to the lack of tourism impact modelling. The cumulative impacts of both offshore and onshore elements have not been adequately assessed, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the project remain uncertain and potentially significant. Incomplete assessments of marine ecology, seabirds, protected species, and marine mammals, coupled with internal inconsistencies, have not met the evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle and hinders the ability to lawfully conclude that the impacts are acceptable.

The proposal is poised to cause substantial and irreversible changes to a highly sensitive landscape. It threatens to industrialise the Atlantic-facing coastline, disrupt dark skies, alter cultural and visual relationships, and negatively impact tourism, resulting in permanent effects that cannot be mitigated satisfactorily.

In summary, the application is both procedurally and substantively unfit for determination. The scale of deficiencies in information, along with policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority is urged to refuse consent on these grounds or to invoke

appropriate regulatory provisions to obtain the necessary missing information.

Therefore, it is formally requested that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Additional Comments

The continued and much unwanted placing of turbines and associated infrastucture is costing the taxpayer dear. Not only does it destroy local amenity of every kind,it also destroys existing jobs in tourism et al that is keeping the local people employed and incidently paying taxes to fund (unfortunately) all these wind farms. Those taxes could be far better spent! If the power is required in the far south of UK for example go build a suitable power station there and not have all these highly vulnerable transmission lines strung out. Come the winter storms repairs will clearly become quite desperate affairs while awaiting the storms to abate. Never mind the desecration of many wild landscapes as all this steel (imported) & cabling (imported) - as Britain has exported all its own industrial capacity to make this ourselves and therefore no way of recouping tax from employees making this equipment on these islands. Net Zero is a farce biting hard on every citizen who is then excluded, ignored and ridden over roughshod by the incompetence of the decision makers. It has to stop! It does not work as is evidenced around the world.

t really is time every development application was put on hold. Looking at maps showing developments across Scotland there will be no tourist industry left. Throwing thousands out of work & possibly onto benefit of some sort. Where oh where are the replacement jobs in this highly doubtful electrical supply chain going to come from? Whether it be battery or turbine or pylon line the outcome for Scottish land is catastrophic. When the 25 year life span is up a few inches of concrete will be removed to tick the box of demolition leaving the rest to utterly change the PH of land for large areas! All of this will NOT provide 24hour 7 days a week power even by the developers own admission as we the public are told to expect power cuts. AI is already looking at gas fired power stations to fuel their insatiable demand for electricity. Then there is the demand for water that these AI units will require just to cool them. Just where is this water coming from? Out of the public taps? Hugely expensive waste of the public purse for little or no return. When life expired how will the scrap turbines, blades et al be dealt with? Most likely at public expense again. Should an area ' own ' a windfarm it is never going to cover the costs of demolition / recycling or landscape repair as expiring sites are already proving, without the tightening of regulations during said 25 years. The damage to upland soils / peat is irreparable as is the cost to the entire natural world be it animal, vegetable, landscape or life in general. Then there is the low frequency noise issue disturbing wildlife generally & our own sleep & well being. The Chernobyl contamination is also lacking full & tested / verified data gathering. Fire risk is not

mentioned for battery storage. One site I saw recently required 2 full years to clean up after fire destroyed the facility. The powers that be must be held accountable personally if this is just swept under the carpet. Indeed the powers that be must be held legally accountable for miss-use of public funds, miss-leading the public on the true scale of each and every development with the government held to account for its totally muddled miss-handling of this countries electricity supply and distribution. Also for allowing far too much overseas ownership of the home electricity industry. This country has to move on from the unmitigated failure of privatisation. No I do not know how, but the people who seek high office are supposed to make this stuff happen and continue to completely fail the taxpayer at every turn. We also have the utterly appalling situation of government ministers refusing to meet the general public to discuss all this while having many, many meetings with contractors & suppliers. This is not transparent and must be stopped. The change in how to object to planning applications is not justified & I wonder if it is even legal. That is objection via email also the much tighter response times.
Disgusting. The public gets no say in any of this, government waves it through and disowns all consequences, business gets a blank check and public picks up the tab yet again along with loss of amenity, jobs & life itself.

Member of Public 226

Objection To Spiorad na Mara Offshore Wind Farm
References: MD-00011742 & MD-00011743

Dear Sir/Madam

This letter serves as a formal objection to the proposed application for the Spiorad na Mara Offshore Wind Farm, which has been submitted in accordance with the relevant marine licensing and Environmental Impact Assessment regimes. A review of the Environmental Impact Assessment Report and accompanying documentation reveals significant planning, environmental, cultural, and procedural deficiencies. The development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and robust cultural identity. Concerns arise regarding the proposal's scale, proximity, and design, particularly in relation to its compliance with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis for a lawful decision. Essential environmental data is absent, baseline information is both limited and inconsistent, and critical elements of the proposal remain undefined. The adoption of a flexible design framework obscures a clear understanding of potential significant effects, while the reliance on unspecified mitigation measures precludes an assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects lack robust supporting evidence.

Moreover, there are evident and substantial conflicts with policy. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These discrepancies directly relate to the statutory tests necessary for obtaining consent and compromise the ability of the competent authority to determine the proposal's acceptability within policy parameters.

The unprecedented scale of the proposal, with large turbines located in close proximity to the shoreline, raises significant issues regarding landscape capacity, visual dominance, and environmental impact. When considered collectively, the lack of sufficient information, dependence on undefined mitigation, evidential deficiencies, and clear non-compliance with policy reveal that the application is incomplete and

cannot support a lawful determination. Under these circumstances, the precautionary principle should be applied.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment related to marine ecology and protected species is fundamentally inadequate, failing to deliver a thorough and reliable understanding of the ecological receptors within the West Lewis coastal environment. This area is recognised as a highly sensitive and biologically rich marine system, yet the baseline data provided is incomplete. The methodologies employed do not effectively capture the presence, behaviour, and habitat use of various species, leading to an assessment that does not offer a credible evidential basis for evaluating potential impacts.

Particularly concerning is the omission regarding otters, which are classified as a European Protected Species. The application does not adequately acknowledge or assess their active utilisation of coastal areas for both foraging and movement. Consequently, this oversight results in a lack of analysis concerning their core foraging range and behavioural patterns. The potential impacts from construction disturbance, noise, and increased activity have therefore not been thoroughly evaluated, undermining any assertions made about the absence of significant effects on this species.

Additionally, the assessment of basking sharks presents further shortcomings, as it relies heavily on aerial surveys that introduce considerable detection bias, especially under Atlantic conditions. This methodology is likely to significantly underestimate the presence of basking sharks, especially when compared to established land-based observations that demonstrate their frequent use of these waters. The failure to adequately incorporate or consider such data culminates in an incomplete baseline, thereby diminishing the reliability of the conclusions drawn.

Given these methodological shortcomings, conclusions stating negligible or non-significant effects are based more on assumptions than on solid evidence. The lack of adequate baseline data inhibits a meaningful evaluation of cumulative and indirect impacts, encompassing seasonal variations and broader ecosystem interactions. This introduces uncertainty concerning the true scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the stipulations of the Environmental Impact Assessment regime or the National Planning Framework 4, as it fails to properly identify or assess protected species. The degree of uncertainty generated precludes the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, the

lawful granting of consent is not achievable.

In summary, the presence of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These deficiencies obstruct a comprehensive evaluation of impacts on marine ecology and protected species, leading to the overarching conclusion that the application lacks a sound evidential foundation.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, seascape, and landscape is significantly flawed and does not reflect the true scale of change or the sensitivity of the environment. The coastline of West Lewis features an open Atlantic horizon and an undeveloped character, contributing to a strong sense of remoteness. The introduction of large-scale turbines near the shoreline would create a continuous industrial presence, fundamentally altering this character and leading to a permanent and irreversible transformation of the landscape.

The application fails to adequately convey the magnitude of this visual change. Due to the scale and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations. This would directly affect visual amenity and undermine the naturalness and remoteness that define the area. The assessment does not accurately reflect this level of impact or its significance within such a sensitive landscape.

There are methodological issues concerning the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly regarding key cultural heritage sites and high-value landscapes. This raises concerns that the visual impact may be understated, thus compromising the reliability of the assessment.

Another critical deficiency is the lack of evaluation regarding the interconnected relationship between landscape, seascape, and cultural heritage. Significant sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape interconnected by visual and spatial relationships with the Atlantic horizon. The assessment treats these as isolated features, failing to acknowledge their interdependence, which leads to an incomplete evaluation of impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are experienced and their connection to the natural horizon. This represents not only a visual impact but also a broader cultural and spatial

harm that has not been sufficiently assessed in the application.

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4 regarding the protection of natural places and historic assets. The extent of change is incompatible with the requirements to safeguard landscape character, visual amenity, and the setting of culturally significant sites. The lack of a comprehensive worst-case assessment further undermines any claims of policy compliance.

It is also evident that the impacts outlined cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. The resulting change is fundamental and permanent, unable to be reduced to an acceptable level through mitigation.

In summary, the assessment does not accurately depict the scale of impact, the sensitivity of the environment, or the interconnected nature of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal's reliance on undefined future measures raises serious concerns, particularly in light of the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and significant habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on prevention, control, or monitoring strategies.

Furthermore, there is a lack of clarity regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. The absence of robust modelling and well-defined management strategies makes it impossible to ascertain the extent, duration, or ecological repercussions of these impacts. This uncertainty also applies to potential effects on marine species and habitats identified as sensitive in the broader assessment.

The assessment of construction and pollution risks is incomplete and lacks the necessary detail to evaluate likely environmental effects. The proposal entails significant seabed preparation and installation works within a high-energy Atlantic environment, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it defers mitigation and contingency measures to a post-consent stage, hindering any meaningful assessment of their adequacy or effectiveness.

The deficiency of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application inhibits the evaluation of whether appropriate safeguards are established to respond to pollution incidents. This procedural risk undermines the competent authority's capacity to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contravenes the requirements of the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation be assessed before consent; without such information, a lawful determination cannot be achieved. The application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, detailed management plans, and clarity regarding potential impacts renders the assessment materially deficient. These inadequacies obstruct a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal poses substantial risks to marine life and the local fishing industry, yet the assessment of fisheries and marine ecosystems is inadequate. The waters off the West Lewis coast are home to both a rich marine ecosystem and a vibrant fishing community. However, the application does not convincingly demonstrate how these vital uses and habitats can be preserved or sustained without significant disruption.

A critical concern is the presumption that fishing activities can be shifted without adverse effects. The application lacks evidence regarding the availability or accessibility of alternative fishing grounds that could withstand increased pressure. This absence of information is troubling, as it raises the possibility of overfishing in other areas, potentially leading to broader economic ramifications for the local fishing fleet. Without a thorough, evidence-based evaluation, understanding the impacts on fisheries and associated livelihoods remains elusive.

Additionally, the proposal carries significant risks for marine species, particularly due to the underwater noise resulting from construction activities. Prolonged high-energy hammer piling is expected to cause disturbances over considerable distances, which may adversely affect species, including dolphins. The predicted disturbance to a notable portion of the local bottlenose dolphin population is a serious concern. Nonetheless, the application minimises the importance of these impacts without adequate supporting evidence.

There is a notable inconsistency in the application where the need for licenses to permit harm to European Protected Species is recognised, while simultaneously, impacts are described as negligible. This contradiction calls into question the reliability of the assessment and raises serious compliance concerns with the Habitats Regulations, especially when harm is anticipated to an extent that necessitates legal authorisation.

Moreover, the assessment neglects to address cumulative impacts stemming from multiple factors such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough evaluation of these combined pressures, it is impossible to determine the overall consequences for marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4 and the National Marine Plan. It does not provide evidence that the development can operate alongside existing marine users or mitigate unacceptable impacts on marine biodiversity, which precludes any conclusion that the proposal aligns with sustainable development principles.

In summary, the deficiencies in evidence concerning fishing displacement, the undervaluation of acoustic impacts, and the internal inconsistencies significantly undermine the assessment's credibility. These shortcomings hinder a comprehensive evaluation of the potential consequences for marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed development involves significant onshore infrastructure linked to offshore turbines, yet the assessment fails to adequately evaluate the full range of impacts as it treats these components separately. This fragmented approach obscures the true scale of the environmental and socio-economic effects that arise from what constitutes a single integrated project.

Integral to the onshore works are the cabling across protected moorland, the construction of a substation near Stornoway, and the associated access infrastructure that passes through sensitive landscapes. Excavation across areas of deep peat, particularly within Barvas Moor, is planned despite its significance as a carbon store and ecologically sensitive habitat. The application lacks a comprehensive assessment of these impacts, which is essential for understanding the project's overall environmental footprint.

Furthermore, the exclusion or deferral of assessing onshore impacts compromises the evaluation of cumulative effects. The Environmental Impact Assessment process

mandates that all project components be considered in unison; however, the distinct assessment of offshore and onshore elements fails to account for the combined impacts on peatlands, habitats, and local communities. This separation raises concerns regarding sensitive habitats, including machair systems and peatland environments that are already protected by policy. The application does not adequately demonstrate that the impacts on these habitats have been fully assessed or that appropriate avoidance measures are in place, resulting in a significant evidential gap concerning biodiversity protection.

There are also serious implications for carbon balance. Disturbing peatland releases stored carbon, which could lead to a carbon debt that contradicts the intended benefits of renewable energy development. The application does not sufficiently address this issue nor show that the overall carbon balance remains advantageous.

Additionally, routing infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. The lack of evidence that necessary consents or processes have been initiated raises further questions about the deliverability and lawful implementation of the project.

From a policy standpoint, the inadequate assessment of the project as a whole and the failure to protect peatlands, habitats, and land use interests contradict the National Marine Plan and National Planning Framework 4. This inability to demonstrate that impacts can be avoided or mitigated severely undermines the application.

In summary, the division of project components, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts make this portion of the application incomplete and unreliable, thus hindering lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposed application introduces permanent red aviation lighting that will be visible over long distances, leading to a continuous and intrusive “wall of light” effect across the western horizon. This change fundamentally alters the night-time environment, yet the assessment of dark skies and nocturnal wildlife is entirely absent from the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which contribute significantly to environmental quality, cultural identity, and tourism value. The failure to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of residents and visitors is a substantial omission, particularly given the importance of dark skies to the area’s identity and its emerging tourism sectors, such as astro-tourism.

Moreover, the application neglects to assess how the proposed lighting may affect nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting due to phototaxis, which can cause disorientation and increase collision risks. The absence of a lighting impact assessment or phototaxis study means that there is no evaluation of how aviation lighting might influence these species or lead to increased mortality. This gap is exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activity or the associated risks. Kittiwakes, which may forage or migrate at night, are also vulnerable to disorientation from artificial lighting, yet this risk has not been addressed. The lack of site-specific night-time data creates a critical deficiency in understanding the ecological impacts of the proposed development.

Without an assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt cannot be achieved, invoking the precautionary principle and hindering a lawful determination. From a policy standpoint, these omissions are inconsistent with National Planning Framework 4 regarding the protection of natural places and environmental quality. Additionally, this failure undermines the comprehensive assessment of landscape and seascape impacts, as the character of night-time environments is integral to the overall ecological context.

In summary, the lack of any assessment of dark skies and nocturnal wildlife presents a significant evidential gap. The absence of baseline data, impact modelling, and species-specific analysis renders the application incomplete and incapable of supporting a lawful determination.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the necessary criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. This application mirrors the fundamental issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. Despite being submitted under a more robust policy framework that emphasises the importance of biodiversity, peatland conservation, landscape integrity, and community wellbeing, it lacks a solid evidential foundation.

There are significant gaps in the baseline data presented, an undefined design envelope, unverified mitigation measures, and missing assessments of key impact areas such as nocturnal wildlife, onshore infrastructure, and tourism effects. The

Environmental Impact Assessment is thus incomplete, failing to provide a thorough understanding of the likely significant effects or any residual impacts.

Procedural shortcomings are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the failure to submit a complete Social Impact Assessment is a serious omission. These shortcomings inhibit the competent authority from evaluating the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Moreover, the proposal contradicts the National Planning Framework 4 by failing to protect biodiversity, natural places, and cultural heritage. It does not demonstrate that health and wellbeing impacts are acceptable, nor does it provide evidence of a net economic benefit due to the lack of tourism impact analysis. The cumulative effects of both offshore and onshore components have not been thoroughly assessed, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks are uncertain and could be significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are either incomplete or inconsistent. The evidential burden required to discount adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and inhibiting a lawful conclusion regarding the acceptability of impacts.

The proposal would lead to substantial and irreversible changes to a sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual connections, and negative impacts on tourism are all permanent effects that cannot be effectively mitigated.

In summary, the application is procedurally and substantively inadequate for determination. The extensive deficiencies in information, along with policy contradictions and unresolved environmental risks, preclude a lawful and evidence-based decision. It is essential for the competent authority to either reject the consent application on these grounds or to invoke the relevant regulatory provisions to require the submission of the necessary information.

Therefore, a formal request is made for the complete refusal of the Spiorad na Mara Offshore Wind Farm application.

Additional Comments

Profit over people

Member of Public 227

Objection To Spiorad na Mara Offshore Wind Farm
References: MD-00011742 & MD-00011743

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The objection is informed by a review of the Environmental Impact Assessment Report and related documentation, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural integrity. The site of the proposed development is located off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity.

The application lacks a solid evidential foundation for a lawful determination. Important environmental data is absent, baseline information is inconsistent and limited, and crucial elements of the proposal remain undefined. The flexible design framework employed hinders a clear understanding of potential significant effects, while the reliance on unspecified mitigation measures prevents any assessment of their effectiveness. Consequently, the documents do not provide a comprehensive or informed view of the environmental, cultural, or community impacts, rendering the claims of negligible or non-significant effects unsupported by adequate evidence.

There are significant policy conflicts present in the proposal. It appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural habitats, cultural heritage, and public health. The application does not prove that it can meet national requirements to safeguard biodiversity, climate interests, and environmental integrity. These conflicts directly impact the statutory tests needed for consent and weaken the ability of the competent authority to determine that the development complies with policy standards.

The scale of the proposed project is unprecedented for this area, with large turbines planned to be positioned close to the shoreline. This raises serious concerns about landscape capacity, visual dominance, and environmental impacts. The combination of insufficient information, reliance on undefined mitigation, evidential shortcomings, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. In light of these factors, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The reliance on a flexible Project Design Envelope, which lacks specific turbine dimensions, layouts, or configurations, introduces substantial uncertainty and compromises the integrity of the Environmental Impact Assessment Report. This approach undermines the ability to apply a consistent worst-case scenario, leading to potential discrepancies between the presented impacts and those of the actual development. As a result, both the public and the competent authority are unable to comprehend the true extent of the environmental effects.

Furthermore, the application is heavily contingent upon mitigation measures, monitoring strategies, and management plans that are yet to be defined. Seeking consent under these conditions means that environmental harm would be addressed only at a later stage, hindering any thorough evaluation of effectiveness or residual impacts. This deferment of critical information to post-consent stages is procedurally unacceptable, contravening the fundamental purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly established before determination.

In addition, the assessment is fraught with evidential deficiencies, including notable gaps in baseline data and limitations in methodology, while relying on assumptions rather than site-specific evidence. This leads to uncertainty concerning the scale and significance of impacts, especially when conclusions regarding negligible or non-significant effects are made without robust supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, resulting in scientific uncertainty that cannot satisfy statutory requirements.

Consequently, the application does not meet the evidential threshold required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal fails to comply with National Planning Framework 4, as it cannot demonstrate that impacts have been thoroughly assessed or that appropriate safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specified mitigation, and significant gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings impede a lawful and robust assessment of environmental effects, placing the competent authority in a position where it cannot adequately determine the application based on the provided information.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species related to the West Lewis coastal environment is insufficient, lacking a complete understanding of the ecological receptors in this biologically active marine system. The baseline data presented is incomplete, and the methodologies employed do not effectively capture the presence, behaviour, and habitat use of various species. Consequently, the assessment fails to offer a reliable evidential basis for evaluating potential impacts.

A notable shortfall in the assessment is its treatment of otters, which are classified as a European Protected Species. The application does not adequately recognise or assess otters' active use of coastal areas for foraging and movement. Without consideration of their core foraging range and behavioural patterns, the assessment overlooks the potential impacts of construction-related disturbance, noise, and increased activity, thereby undermining the conclusions drawn about the absence of significant effects on this species.

Additionally, there are significant deficiencies in the assessment of basking sharks. The reliance on aerial surveys leads to considerable detection bias, particularly under Atlantic conditions. This method is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that indicate a frequent presence in these waters. The failure to properly incorporate such critical data results in an incomplete baseline, which in turn diminishes the reliability of the conclusions reached.

These methodological shortcomings mean that the conclusions asserting negligible or non-significant effects are based more on assumptions than on robust evidence. The lack of adequate baseline data further hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty obscures the true scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not comply with the Environmental Impact Assessment regime or the requirements set out in National Planning Framework 4, as the proper identification and assessment of protected species are lacking. The uncertainty generated by these deficiencies prevents any conclusion about adverse effects being made beyond reasonable scientific doubt, necessitating the application of the precautionary principle. In light of these issues, it is clear that consent cannot be granted lawfully.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions leads to an unreliable assessment. These significant deficiencies hinder a thorough evaluation of impacts on marine ecology and protected

species, ultimately indicating that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, revealing significant gaps in evidence and inconsistencies that compromise its conclusions. It is essential to recognise that the west coast of the Isle of Lewis is home to internationally significant seabird populations, many of which are already facing decline. However, the application fails to provide the necessary evidential standard to prove that these species will remain unaffected. The proposed site is situated within critical foraging areas and migratory routes, yet the assessment inadequately evaluates the risks related to displacement, collision, and habitat loss.

Moreover, there exists a crucial contradiction within the application itself, as the developer asserts no significant adverse effects while simultaneously submitting a Habitats Regulations derogation case. Such a derogation is only warranted when significant harm is anticipated. This inconsistency raises serious doubts regarding the reliability of the assessment and suggests that the conclusions drawn are not supported by the evidence presented.

The evaluation lacks sufficient evidence to ensure that seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not thoroughly addressed, and the reliance on modelling methods injects uncertainty, particularly for species that are already in serious decline, such as Kittiwakes and Fulmars. The methodologies employed may underestimate mortality rates, especially given the incomplete baseline data and the incomplete understanding of behavioural responses.

Additionally, the placement of turbines within a recognised migratory corridor poses another substantial risk, as it effectively obstructs a primary flight path used by species migrating between the United Kingdom and Iceland. The application fails to provide a thorough assessment of the long-term consequences of sustained mortality within this corridor or the potential impact on species that have relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold required to ascertain that there will be no adverse effect on the integrity of protected sites. The presence of contradictory findings, coupled with data deficiencies and limitations in the modelling, signifies that the standard of beyond reasonable scientific doubt has not been satisfied. This situation invokes the precautionary principle and prohibits a lawful conclusion that would support consent.

The identified deficiencies also indicate non-compliance with the National Planning Framework 4 concerning the protection of biodiversity and the preservation of natural assets. The failure to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct opposition to national policy.

In summary, the assessment is deemed unreliable due to its internal contradictions, methodological inadequacies, and lack of sufficient evidence. These shortcomings hinder a rigorous evaluation of potential impacts and culminate in the conclusion that the application does not fulfil the statutory requirements necessary for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity is severely lacking, as it overlooks the West Lewis coastline as a vibrant cultural landscape where environment, tradition, language, and community are deeply interconnected. The application simplifies heritage into separate, unchanging assets, neglecting to acknowledge their ongoing social, cultural, and spiritual significance within the community.

There is a notable shortcoming in how culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are treated. These sites serve as active places of burial and spiritual practice; however, the assessment designates them as static elements, failing to recognise their continued relevance, meaning, and the potential impact of development on their surroundings. This misrepresentation leads to an incomplete understanding of the cultural effects and dismisses their importance in community life.

Moreover, the application neglects to consider intangible cultural heritage, which encompasses the Gaelic language, local traditions, and the enduring relationship that the community has with the coastal environment. These aspects are vital to the identity of the area, yet they are completely omitted from the assessment, which is a significant oversight. Without acknowledging these elements, the true cultural impact of the development remains unclear.

Concerns also arise regarding community rights and involvement. The Gaelic-speaking population embodies a unique cultural identity with traits of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the credibility of the assessment and fails to align with established principles of participation concerning cultural and environmental interests.

A significant procedural flaw is the failure to conduct a compliant Island Communities Impact Assessment, which is legally required under the Islands (Scotland) Act 2018.

The absence of this assessment hinders the competent authority from fulfilling its legal obligation to assess the social, cultural, and economic effects on the island community. This omission alone obstructs a lawful determination.

From a policy standpoint, these shortcomings directly contravene the National Planning Framework 4, especially concerning the safeguarding of historic sites and landscapes. The neglect of both tangible and intangible heritage and the failure to acknowledge living cultural practices indicate a clear deviation from policy mandates.

Overall, the lack of consideration for living heritage, intangible cultural values, community rights, and statutory responsibilities leads to a significant evidential gap. The cultural impacts of the proposed development have not been thoroughly evaluated, and the application falls short of providing a robust basis for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's commissioned Social Impact Assessment, which included focus groups with local residents, has not had its full report published. This lack of disclosure represents a significant evidential gap that impedes both the public and the competent authority from comprehending the complete range of social risks uncovered by the developer's own research. Without access to the full assessment, the ability to properly scrutinise the findings is severely limited, thereby obstructing the assessment of their significance in the decision-making process.

Residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal, as indicated by available summaries. These impacts are based on direct engagement with the community and are therefore not speculative. Furthermore, the proposal is seen as a direct threat to community identity and cohesion, with the developer's findings noting a "cultural loss." Despite the gravity of these issues, they have not been adequately incorporated into the main application or given the appropriate consideration they warrant.

The failure to publish the full Social Impact Assessment obscures the true human and social costs of the development, undermining the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when the character and functioning of the community may be affected. By withholding the complete dataset, the application fails to provide a robust evidential basis for weighing the benefits against the potential harm.

From a policy standpoint, the application does not demonstrate compliance with

National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and mitigate harm, yet existing adverse effects have not been fully disclosed in the available evidence. Consequently, without the complete assessment, adherence to this policy cannot be verified.

The procedural implications are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation in the absence of the full Social Impact Assessment. This omission constitutes a material flaw within the application and signifies a failure to meet the evidential standards required by the Environmental Impact Assessment framework. Overall, the combination of not disclosing the full Social Impact Assessment and the evidence of existing adverse impacts renders the evaluation incomplete and unreliable, hindering a lawful determination and reinforcing the conclusion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts and their implications for seascape and landscape quality is insufficient and fails to capture the true extent of change anticipated in the area. The character of the West Lewis coastline is characterised by an expansive Atlantic horizon, a largely undeveloped environment, and a profound sense of remoteness. The planned installation of large turbines near the shoreline would introduce a persistent industrial presence, fundamentally transforming this unique landscape and resulting in an irreversible alteration of its character.

The proposal does not fully address the extent of the visual changes that would occur. Given their size and proximity, the turbines are likely to dominate views from nearby residential areas, historic sites, and frequently visited coastal spots. This dominance would negatively affect visual amenity and undermine the essential qualities of naturalness and remoteness associated with the area. The assessment inadequately conveys the significance of this impact in relation to the sensitivity of the surrounding landscape.

Methodological issues also arise concerning the choice and depiction of visual viewpoints. Evidence indicates that the selected viewpoints may not adequately represent the most sensitive receptors or the most severe scenarios, particularly concerning key cultural heritage sites and landscapes of high value. Such a shortcoming risks underestimating the visual impact, which jeopardises the reliability of the assessment.

Additionally, the assessment neglects to evaluate the interconnectedness of landscape, seascape, and cultural heritage. Significant sites, including the Calanais

Standing Stones and other Scheduled Monuments, are integral to a broader landscape context that is visually and spatially linked to the Atlantic horizon. The evaluation incorrectly treats these sites as standalone entities, disregarding their interrelationships, which leads to an incomplete analysis of their setting and cultural relevance.

The proposed industrialisation of the seascape threatens to disrupt these connections, altering how heritage assets are perceived and severing their ties to the natural horizon. This situation presents not merely a visual concern but extends to broader cultural and spatial detriments that the application fails to adequately consider.

From a policy standpoint, the proposal is at odds with the National Planning Framework 4 regarding the preservation of natural environments and historical assets. The scale of transformation proposed does not comply with the necessary protections for landscape character, visual amenity, and the settings of sites of cultural importance. The lack of a comprehensive worst-case scenario assessment further diminishes the credibility of the proposal's alignment with policy requirements.

Moreover, it is evident that the identified impacts cannot be satisfactorily mitigated. The size, height, and proximity of the turbines would result in a presence that is both dominant and unavoidable. Thus, the anticipated changes are foundational and permanent, incapable of being reduced to an acceptable level through mitigation efforts.

In conclusion, the assessment fails to accurately portray the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings undermine the ability to conduct a reliable evaluation and reinforce the assertion that the proposal is incompatible with the protection of this significant landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposed development presents significant deficiencies in the assessment of construction and pollution risks, which are insufficient for evaluating potential environmental effects. The project entails extensive seabed preparation and installation activities in a high-energy Atlantic environment. However, there are no fully articulated Construction Environmental Management Plans or Pollution Prevention Plans provided. Instead, the application defers mitigation and contingency measures to a post-consent phase, which impedes any substantial assessment of their adequacy or effectiveness.

This approach is particularly troubling given the delicate nature of the receiving environment. The West Lewis coastline is home to clean coastal waters and vital

habitats that are susceptible to both sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it fails to offer adequate detail on preventative, control, or monitoring strategies.

Moreover, there is considerable uncertainty regarding the scale and behaviour of sediment plumes generated from seabed disruption and cable installation. In the absence of robust modelling and explicit management strategies, it remains impossible to ascertain the extent, duration, or ecological consequences of these effects. This uncertainty also extends to potential impacts on marine species and habitats already recognised as sensitive within the broader assessment.

The lack of comprehensive emergency response procedures only exacerbates these issues. By postponing contingency planning until after consent is granted, the application obstructs the evaluation of whether sufficient safeguards are in place to address pollution incidents. This creates procedural risk and diminishes the capacity of the competent authority to assess environmental protection measures at the decision-making stage.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. An assessment of likely significant effects and their corresponding mitigation must occur prior to consent; where such information is lacking, a lawful determination cannot be achieved. Additionally, the application fails to demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts collectively render the assessment materially inadequate. These shortcomings hinder a thorough evaluation of construction and pollution risks and further reinforce the assertion that the application remains incomplete.

TOURISM

The tourism sector on the Isle of Lewis plays a vital role in the local economy, having expanded from £65 million in 2017 to over £81.5 million, generating more than 1,000 jobs and constituting up to 16% of the island’s economy. However, the application in question exhibits a significant deficiency in its assessment of tourism impacts, neglecting to evaluate the economic and social repercussions for this key sector. Despite the application’s acknowledgment that 86% of visitors are attracted by the area's scenery, it fails to provide a quantified analysis of how large-scale offshore infrastructure could influence visitor numbers, behaviour, or the overall economic

contribution of tourism.

Furthermore, the assessment does not address the critical role of environmental quality in sustaining tourism, particularly the significance of unspoiled landscapes and dark skies for enhancing visitor experiences and supporting emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, resulting in a considerable gap in understanding the potential impacts on an acknowledged and expanding segment of the local economy.

The implications of the inadequate assessment extend to the wider community, given the island's limited economic diversification. The failure to consider tourism impacts raises concerns regarding employment, local businesses, and community sustainability. Additionally, the absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been thoroughly evaluated, as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly concerning economic impact and the requirement to provide evidence of net benefit. It also contradicts strategic objectives that recognise tourism as a priority growth sector, thereby lacking the necessary information for the competent authority to adequately assess the economic implications of the proposal.

Overall, the deficiencies in quantifying tourism impacts, analysing environmental factors that drive visitor behaviour, and acknowledging the island's economic dependency culminate in a significant evidential void. This gap obstructs a thorough evaluation of economic effects and reinforces the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the requirements for sustainable development according to statutory duties, national policy, and evidential standards. It presents similar issues to those that led to the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This current application is submitted under a stronger policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing.

The application lacks a complete and reliable evidential basis for determination. There are significant gaps in baseline data, reliance on an undefined design envelope, unspecified mitigation measures, and key impact pathways that have been overlooked, such as nocturnal wildlife, comprehensive onshore infrastructure, and tourism impacts. Consequently, the Environmental Impact Assessment is incomplete and does not

provide a thorough understanding of the likely significant effects or residual impacts.

There are procedural issues as well. The absence of a compliant Island Communities Impact Assessment contravenes statutory duties under the Islands (Scotland) Act 2018, and not disclosing the full Social Impact Assessment is a material omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

Moreover, the proposal conflicts with National Planning Framework 4. It does not demonstrate the protection of biodiversity, natural places, or cultural heritage, fails to show acceptable health and wellbeing impacts, and lacks evidence of a net economic benefit due to insufficient tourism impact modelling. The cumulative impact of both offshore and onshore elements has not been adequately assessed, obscuring effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks are uncertain and potentially significant. The assessments of marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The evidential threshold needed to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful conclusion regarding acceptable impacts.

The proposal would lead to significant and irreversible changes to a sensitive landscape. The industrialisation of the Atlantic-facing coastline, loss of dark skies, disruption of cultural and visual relationships, and negative impacts on tourism represent permanent effects that cannot be mitigated to an acceptable level.

Overall, the application is both procedurally and substantively unfit for determination. The substantial information deficiencies, policy conflicts, and unresolved environmental risks obstruct a lawful and evidence-based decision. Therefore, the competent authority should refuse consent on these grounds or invoke the necessary regulatory provisions to require the submission of the missing information.

As a result, I formally request that the application for the Spiorad na Mara Offshore Wind Farm is refused entirely.

Additional Comments

Been born an islander and lived In Lewis most of my life I am saddened that we are just a dumping ground when it comes to a quick solution for clean energy Corporations to make a profit. These isles because of their remoteness have always been the easy option/solution for those in power to bring out i.e. "send prisoners and illegal migrants to

the Western Isles", just shows how out of touch and ignorant these people are.

Our family home is in Stornoway, I and our family have a deep connection to these Isles, my people are from Ness and both parents are buried there, I know they wouldn't like to see the Islands covered with wind farms. I live in the central belt now and those turbines are an ugly sight on the beauty of the rolling hills here, I can only imagine how awful they would look dotted over our island. Nevermind "Stop the Boats" STOP THE TURBINES!
✊

Member of Public 228

Objection To Spiorad na Mara Offshore Wind Farm
References: MD-00011742 & MD-00011743

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes.

The objection is grounded in an analysis of the Environmental Impact Assessment Report and accompanying documents, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence.

The proposed development is located off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, relatively unspoiled environment, and strong cultural identity.

The proposal's scale, design, and proximity to the shoreline raise critical concerns regarding its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks an adequate evidential basis necessary for a lawful determination. Essential environmental data is absent, baseline information is both limited and inconsistent, and several key elements of the proposal remain undefined.

The employment of a flexible design framework obscures the understanding of likely significant effects, while the reliance on unspecified mitigation measures prevents an assessment of their effectiveness.

Consequently, the documentation fails to facilitate a comprehensive understanding of environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects are not underpinned by robust evidence.

There are notable and substantial conflicts with existing policy. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and health and wellbeing.

It does not sufficiently demonstrate that national requirements aimed at protecting biodiversity, climate interests, and environmental integrity can be fulfilled. These conflicts are directly related to the statutory tests necessary for consent, thereby undermining the competent authority's ability to conclude that the development meets acceptable policy standards.

The unprecedented scale of the proposal raises significant concerns regarding landscape capacity, visual impact, and environmental repercussions. With large turbines situated close to the shoreline, the application's deficiencies—including insufficient information, reliance on undefined mitigation strategies, and evident policy non-compliance—render it incomplete and incapable of supporting a lawful determination. In light of these circumstances, the precautionary principle should be applied.

ASSESSMENT OF ALTERNATIVES

The application lacks a robust and evidence-based comparison of alternatives, failing to meet the essential statutory requirements of the Environmental Impact Assessment regime. Instead of providing a thoughtful evaluation of feasible alternatives based on their environmental consequences, it offers merely a narrative about how the project has evolved. This deficiency indicates that less harmful options have not been adequately identified, assessed, or chosen over more damaging solutions.

There is an absence of transparent analysis regarding potential offshore locations, various development scales, or design configurations. Specifically, the application does not show that the developer has genuinely contemplated placing turbines further offshore, where the impacts on visual aesthetics, ecology, and the coastline would likely be diminished. The sensitivity of the West Lewis coastline highlights the significance of proximity to the shore in assessing impact, and the lack of such analysis obstructs any assertion that the proposed siting is the least damaging option available.

This inadequacy extends to the assessment of cable routing and landfall, with insufficient evidence that alternative routes have been thoroughly investigated to minimise effects on sensitive areas. . The lack of a clear avoidance strategy and the absence of comparative analysis suggest that mitigation by design has not been implemented, leading to an over-reliance on post-design mitigation measures.

Consequently, the application does not adequately demonstrate that environmental harm has been minimised through informed site selection, layout, and infrastructure routing. This reflects a failure to adhere to the established mitigation hierarchy, preventing the competent authority from determining if there are less harmful and more suitable alternatives. Without a comprehensive assessment of alternatives, it cannot be concluded that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this shortcoming undermines adherence to National Planning Framework 4, particularly concerning the protection of natural environments, cultural heritage, and community wellbeing. The omission of a structured and comparative

assessment is significant, leading to the conclusion that the application has not been sufficiently evaluated and cannot warrant a lawful decision.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development as outlined by statutory duties and national policy. It echoes the central concerns that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. This application, although presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, still falls short.

There are significant shortcomings in the evidential basis for this application. The absence of complete baseline data and the continued reliance on an undefined design envelope raise serious concerns. Moreover, the unspecified mitigation measures and the lack of consideration for key impact pathways—such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism—further complicate the assessment. Consequently, the Environmental Impact Assessment is incomplete, hindering a full understanding of the likely significant effects and any residual impacts.

Procedural failures are also evident in this application. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, and the failure to provide a comprehensive Social Impact Assessment represents a significant omission. These shortcomings inhibit the competent authority from fully evaluating the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

In addition, the proposal contradicts the National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural places, and cultural heritage, nor does it show that health and wellbeing impacts are acceptable. The absence of tourism impact modelling also undermines claims of net economic benefit. A thorough assessment of the cumulative impact from both offshore and onshore elements has not been conducted, leaving uncertainties regarding the effects on peatlands, carbon balance, habitats, and crofting land.

The environmental risks associated with the proposal remain uncertain and could be significant. The assessments related to marine ecology, seabirds, protected species, and marine mammals are lacking in completeness and are inconsistent in places. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been achieved, which engages the precautionary principle and precludes a lawful conclusion regarding the acceptability of impacts.

Furthermore, the proposal would result in considerable and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual relationships, and the negative impacts on tourism represent enduring effects that cannot be adequately mitigated.

Overall, the application is both procedurally and substantively unfit for determination. The scale of information deficiencies, alongside policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. It is imperative that the competent authority refuse consent for the Spiorad na Mara Offshore Wind Farm application in its entirety or utilise relevant regulatory measures to compel the submission of the necessary information.

Additional Comments

I am concerned not only about the environmental impact and the lack of community ownership and benefit.

Member of Public 229

Objection To Spiorad na Mara Offshore Wind Farm
References: MD-00011742 & MD-00011743

Dear Sir/Madam

This representation constitutes a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The scale of the proposal is unprecedented in this location, with large turbines positioned in close proximity to the shoreline, which raises significant concerns regarding landscape capacity, visual dominance, and environmental impact. The development is located off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

The application fails to provide an adequate evidential basis for a lawful determination. Critical environmental data is missing, baseline information is limited and inconsistent, and key aspects of the proposal remain undefined. The reliance on a flexible design framework inhibits a clear understanding of likely significant effects, while the use of unspecified mitigation measures means their effectiveness cannot be assessed. Consequently, the documentation does not enable a full or informed understanding of environmental, cultural, or community impacts, and claims of negligible or non-significant effects are not supported by robust evidence.

There are clear and substantive policy conflicts associated with this proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate that national requirements to protect biodiversity, climate interests, and environmental integrity can be met. These conflicts directly relate to the statutory tests required for consent and undermine the capacity of the competent authority to conclude that the development is acceptable in policy terms.

Taken together, the absence of sufficient information, reliance on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance illustrate that the application is incomplete and cannot support a lawful determination. In these circumstances, it is imperative that the precautionary principle applies.

MARINE ECOLOGY AND PROTECTED SPECIES

The application presents significant deficiencies in the assessment of marine ecology and protected species, particularly within the context of the West Lewis coastal

environment, which is noted for its sensitivity and biological activity. The methodologies employed in the assessment fail to adequately capture crucial information regarding species presence, behaviour, and habitat use, leading to an incomplete understanding of ecological receptors. Consequently, the evidential basis for evaluating impacts is insufficient.

A notable shortcoming involves the treatment of otters, recognised as a European Protected Species. The assessment does not adequately account for their active use of coastal areas for foraging and movement. The omission of their core foraging range and behavioural patterns results in a failure to assess the potential impacts of construction-related disturbance, noise, and increased activity. This oversight raises questions about the validity of the conclusions drawn regarding the absence of significant effects on this species.

Further limitations are evident in the evaluation of basking sharks, where reliance on aerial surveys introduces significant detection bias, particularly under Atlantic conditions. This method is likely to underestimate the presence of these sharks, especially when compared with established land-based observations that suggest frequent usage of these waters. The lack of integration or proper consideration of such data contributes to an incomplete baseline, undermining the reliability of the conclusions reached.

The methodological flaws present in the assessment mean that the conclusions of negligible or non-significant effects are largely based on assumptions rather than on solid evidence. The absence of sufficient baseline data hinders the ability to conduct meaningful assessments of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty regarding the actual risks faced by marine species and habitats.

From a regulatory viewpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime or the National Planning Framework 4, as protected species have not been properly identified or assessed. The uncertainty introduced by these deficiencies prevents any exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it follows that consent cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions undermines the reliability of the assessment. These deficiencies inhibit a thorough evaluation of impacts on marine ecology and protected species, leading to the overall determination that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is deeply flawed, characterised by significant internal inconsistencies and a lack of robust evidence, which undermines its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application fails to adequately demonstrate that these species will not suffer adverse effects. The proposed site lies within critical foraging areas and migratory pathways, yet the assessment neglects to thoroughly evaluate the risks of displacement, collision, and habitat loss.

Furthermore, a fundamental contradiction arises within the application: the developer asserts that no significant adverse effects will occur while simultaneously presenting a case for Habitats Regulations derogation, which is only warranted when significant harm is anticipated. This inconsistency raises serious concerns about the reliability of the assessment and suggests that its conclusions are not substantiated by the evidence provided. The assessment does not convincingly show that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The crucial nature of these feeding grounds is insufficiently considered, and the reliance on modelling methods introduces uncertainty, particularly for declining species like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality rates, especially when baseline data is lacking and behavioural responses are not fully understood.

Additionally, the siting of turbines within a recognised migratory corridor poses a further significant risk, effectively obstructing a primary flight path for species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor have not been adequately assessed, nor have the potential effects on species with small global populations been considered. From a regulatory standpoint, the application does not meet the evidential threshold necessary to determine that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, precluding a lawful conclusion in favour of consent.

The deficiencies in the assessment also indicate a failure to comply with National Planning Framework 4 regarding the protection of biodiversity and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected directly conflicts with national policy. In summary, the assessment is unreliable due to its internal inconsistencies,

methodological weaknesses, and insufficient evidence, all of which obstruct a thorough evaluation of impacts and affirm that the application does not fulfil the statutory requirements for a lawful determination.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal raises significant concerns about social impacts, health, and wellbeing, as the assessment conducted is materially deficient and lacks transparency. Although the developer commissioned a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This creates an evidential gap, making it difficult for both the public and the competent authority to grasp the complete range of social risks identified by the developer's own research.

Summaries that are available suggest that residents are currently experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These issues arise from direct engagement and are not based on speculation. However, without the full assessment being disclosed, it is impossible to scrutinise the findings properly, which limits the capacity to evaluate their importance in the decision-making process.

Additionally, the proposal is viewed by many as a direct threat to community identity and cohesion, with the developer's findings indicating a risk of "cultural loss." These impacts have not been sufficiently considered within the main application or given the appropriate significance. The failure to share the complete Social Impact Assessment clouds the true human and social costs of the development.

This lack of transparency directly undermines the Environmental Impact Assessment process. For developments of this magnitude, a thorough understanding of social, economic, and health impacts is critical, especially when community character and functioning are at risk. The omission of the full dataset results in an incomplete evidential basis for weighing the benefits against the potential harms.

From a policy standpoint, the application does not comply with National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and avoid negative effects; however, existing evidence suggests adverse impacts that have not been fully revealed. Without access to the complete assessment, demonstrating compliance with this policy is not feasible.

The procedural implications are considerable. The competent authority is unable to conduct a comprehensive socio-economic and health evaluation without the complete Social Impact Assessment. This omission constitutes a material failure within the application and does not satisfy the evidential requirements of the Environmental

Impact Assessment regime.

In conclusion, the non-disclosure of the full Social Impact Assessment, in conjunction with the evidence of existing adverse impacts, results in an incomplete and unreliable assessment. This hampers a lawful determination and underscores that the application lacks sufficient information to proceed.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the standards of sustainable development as outlined by statutory obligations, national policy, and evidential requirements. It echoes the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This new application, despite being presented under a more robust policy framework, does not adequately address biodiversity, peatland preservation, landscape integrity, or community wellbeing.

There are notable deficiencies in the evidential basis provided for this application. Critical baseline data is lacking, and the proposal relies on an undefined design envelope along with unspecified mitigation measures. Furthermore, it omits essential impact pathways, such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a full understanding of significant effects or potential residual impacts.

Procedural shortcomings also characterise this application. The absence of a compliant Island Communities Impact Assessment is a violation of the statutory duty outlined in the Islands (Scotland) Act 2018, while the failure to provide a comprehensive Social Impact Assessment constitutes a significant omission. These gaps inhibit the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for consideration.

Furthermore, the proposal directly contradicts the principles laid out in National Planning Framework 4. It does not adequately protect biodiversity, natural landscapes, or cultural heritage, nor does it demonstrate that health and wellbeing impacts are acceptable. The lack of tourism impact modelling fails to provide evidence of any net economic benefit, and the cumulative effects of both offshore and onshore components have not been sufficiently assessed, obscuring impacts on peatlands, carbon balance, habitats, and agricultural land.

Uncertainties regarding environmental risks remain significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent, failing to meet the evidential threshold necessary to rule

out adverse effects beyond reasonable scientific doubt. This engages the precautionary principle and complicates the ability to lawfully conclude that the impacts are acceptable.

The proposed development would also lead to substantial and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, and disruptions to cultural and visual relationships will cause permanent effects that cannot be mitigated satisfactorily.

Considering these factors collectively, the application emerges as both procedurally and substantively unfit for determination. The combination of information deficiencies, policy contradictions, and unresolved environmental risks obstructs the ability to make a lawful, evidence-based decision. Therefore, it is requested that the application for the Spiorad na Mara Offshore Wind Farm be entirely refused.

Additional Comments

I am deeply concerned about how this will affect rural citizens, ecology and the environment. I want renewables that do not hurt the people surrounding them, kill birds or hurt the environment.

Member of Public 230

Objection To Spiorad na Mara Offshore Wind Farm
References: MD-00011742 & MD-00011743

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. A review of the Environmental Impact Assessment Report and its supporting documentation has revealed numerous material deficiencies across planning, environmental, cultural, and procedural domains. The development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, nearly untouched environment, and robust cultural identity. The scale, proximity, and design of the wind farm raise significant concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks an adequate evidential basis necessary for a lawful determination. Important environmental data is absent, baseline information is both limited and inconsistent, and critical elements of the proposal remain unspecified. The employment of a flexible design framework hinders a clear understanding of likely significant effects. Additionally, the reliance on yet-to-be-defined mitigation measures means that their effectiveness cannot be evaluated. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects lack robust supporting evidence.

There are notable and significant policy inconsistencies. The proposal appears to conflict with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national obligations to protect biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests required for consent and compromise the ability of the competent authority to determine the development's acceptability in policy terms.

The unprecedented scale of the proposal in this location, with large turbines located in close proximity to the shoreline, raises serious concerns regarding landscape capacity, visual impact, and environmental consequences. The combination of insufficient information, reliance on undefined mitigation, evidential shortcomings, and clear policy non-compliance illustrates that the application is incomplete and cannot support a

lawful determination. In light of these findings, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary completeness and transparency, failing to reliably detail the expected environmental effects of the proposal. The reliance on a flexible Project Design Envelope, which does not commit to precise turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This approach hampers the ability to apply a worst-case scenario consistently, thereby undermining the assessment's integrity. Consequently, the impacts outlined may not accurately reflect the final development, which hinders both public and competent authority understanding of the actual environmental effects.

The application is significantly dependent on undefined mitigation measures, monitoring strategies, and management plans, which remain unestablished at this stage. As consent is being sought based on the premise that environmental harm will be addressed later, this prevents any substantive evaluation of the effectiveness of these measures or a proper assessment of residual impacts. Such deferral of critical information to post-consent phases is procedurally inappropriate and conflicts with the fundamental aims of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly defined prior to determination.

Additionally, there are marked evidential shortcomings, including insufficient baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This creates uncertainty regarding the scale and significance of impacts, especially where negligible or non-significant effects are concluded without adequate supporting data. The lack of comprehensive information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainties that are incompatible with statutory requirements.

As a result, the application does not satisfy the evidential standards mandated under the Habitats Regulations, failing to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate adherence to the National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it has not been established that the impacts have been thoroughly assessed or that sufficient safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies preclude a lawful

and rigorous assessment of environmental effects, placing the competent authority in a position where it cannot responsibly determine the application based on the information that has been presented.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposal under consideration lacks a comprehensive assessment of marine ecology and protected species, which is essential for understanding the ecological receptors within the West Lewis coastal environment. This region is recognised as a highly sensitive and biologically active marine system. However, the data available is incomplete, and the methodologies employed do not adequately capture the presence, behaviour, or habitat use of various species. Consequently, the assessment does not provide a reliable evidential basis for evaluating potential impacts.

Notably, the assessment fails to properly identify and assess otters, which are a European Protected Species. There is insufficient recognition of their active use of coastal areas for foraging and movement, and the core foraging range and behavioural patterns of otters have not been adequately considered. This lack of detail means that the potential impacts of construction disturbance, noise, and increased activity on otters have not been thoroughly assessed, undermining any conclusions about the absence of significant effects on this species.

Additionally, there are substantial deficiencies in the assessment of basking sharks, as the reliance on aerial surveys introduces considerable detection bias, particularly in Atlantic conditions. This methodology is likely to lead to an underestimation of their presence, especially when compared to established land-based observations that indicate frequent use of these waters. The failure to incorporate or adequately consider such relevant data results in an incomplete baseline and weakens the reliability of the conclusions drawn.

The methodological limitations present mean that conclusions suggesting negligible or non-significant effects are based more on assumptions than on solid evidence. The lack of adequate baseline data also hampers the ability to conduct meaningful assessments of cumulative and indirect impacts, including seasonal variations and interactions within the wider ecosystem. This situation creates uncertainty about the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime and the National Planning Framework 4, as there has been a failure to properly identify or assess protected species. The uncertainty introduced by these deficiencies prevents the conclusion that adverse effects can be excluded beyond reasonable scientific doubt, thus engaging the

precautionary principle. In light of these circumstances, consent cannot be lawfully granted.

In summary, the assessment is rendered unreliable due to the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions. These deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species, leading to the overall determination that the application lacks a sufficient evidential foundation.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal has raised considerable concerns regarding community identity and cohesion, with findings from the developer indicating a potential “cultural loss.” Despite this acknowledgement, these impacts have not been adequately incorporated into the main application or sufficiently weighted in the assessment process. This omission highlights a significant evidential gap, as the full Social Impact Assessment has not been published. Consequently, both the public and the competent authority are unable to grasp the full extent of the social risks identified by the developer’s own research.

Residents are already reporting measurable levels of stress, anxiety, and concern resulting from the scale and proximity of the proposed development. These impacts stem from direct engagement and should not be regarded as speculative. However, the lack of disclosure surrounding the full assessment limits the capacity for thorough scrutiny of the findings and hinders the determination of their relevance within the decision-making framework.

Furthermore, this lack of transparency compromises the Environmental Impact Assessment process, as a complete understanding of social, economic, and health impacts is crucial for developments of such magnitude. The application fails to present a comprehensive evidential basis for weighing the balance between benefits and harm due to the absence of the complete dataset.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Developments are expected to promote positive health outcomes and mitigate harm, yet the available evidence suggests existing adverse effects have not been fully disclosed. Without access to the full Social Impact Assessment, it cannot be substantiated that the application aligns with this policy.

The procedural implications are considerable, as the competent authority cannot conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This represents a material omission in the application, failing to

satisfy the evidential requirements of the Environmental Impact Assessment regime.

In conclusion, the non-disclosure of the full Social Impact Assessment, alongside evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This deficiency obstructs a lawful determination and underscores the inadequacy of the information supporting the application.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts on the seascape, landscape, and cultural heritage is insufficient and does not truly capture the extent of change or the sensitivity of the environment. The West Lewis coastline is characterised by its open Atlantic horizon and undeveloped nature, which contribute to a strong sense of remoteness. Large-scale turbines placed near the shoreline would introduce a continuous industrial presence that would fundamentally change this character, leading to a permanent and irreversible alteration of the landscape.

The application inadequately represents the scale of this visual change. Due to the size and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations. This dominance would have a direct impact on visual amenity and detract from the naturalness and sense of remoteness that define the area. The assessment does not accurately convey the significance of this impact within the context of such a sensitive landscape.

Methodological issues arise concerning the selection and presentation of visual viewpoints. There is evidence suggesting that these viewpoints might not adequately reflect the most sensitive receptors or worst-case scenarios, particularly regarding key cultural heritage sites and high-value landscapes. This raises concerns that the scale of visual impact may have been understated, which calls the reliability of the assessment into question.

Additionally, there is a failure to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape linked by visual and spatial relationships to the Atlantic horizon. Treating these heritage assets as isolated rather than interdependent results in a poor assessment of impacts on their setting and cultural significance.

The introduction of industrial elements to the seascape would disrupt these relationships, changing the context in which heritage assets are perceived and severing their connection to the natural horizon. This presents not just a visual issue but also broader cultural and spatial harm that has not been sufficiently analysed within the

application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4, which aims to protect natural spaces and historic assets. The extent of change is at odds with the requirement to maintain landscape character, visual amenity, and the context of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertion of policy compliance.

Moreover, the impacts outlined cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be prominent and inescapable. Consequently, the change would be fundamental and permanent, and not something that could be reduced to an acceptable level through mitigation efforts.

Overall, the assessment does not accurately reflect the scale of impact, the sensitivity of the environment, or the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and underscore the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposed development raises serious concerns due to the incomplete assessment of construction and pollution risks, which lacks the necessary detail to properly evaluate the likely environmental effects. The project plans include significant seabed preparation and installation works in a high-energy Atlantic environment, yet there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application suggests that mitigation and contingency measures will be developed after consent is granted, hindering any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined measures is particularly alarming given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are at risk of sediment disturbance and contamination. Although the application acknowledges potential risks such as sediment mobilisation and accidental spills of chemicals or oil, it fails to provide sufficient detail on how these risks will be prevented, controlled, or monitored.

Moreover, there is considerable uncertainty about the scale and behaviour of sediment plumes that could result from seabed disturbance and cable installation. Without thorough modelling and clearly articulated management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also pertains to the potential effects on sensitive marine species and habitats identified in the broader assessment.

The lack of detailed emergency response procedures further exacerbates these issues. By postponing contingency planning until after consent, the application obstructs the evaluation of whether adequate safeguards are established to respond to pollution incidents. This approach introduces procedural risk and undermines the ability of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and necessary mitigation must be evaluated before consent is granted, and when such information is absent, a lawful determination cannot occur. Additionally, the application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts all contribute to a materially deficient assessment. These significant shortcomings prevent a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal fails to provide a thorough evaluation of the socio-economic impacts and ecological effects on the local marine life and fishing industry. The waters off the West Lewis coast host a rich marine ecosystem, yet the application does not adequately demonstrate how these vital habitats can be preserved without substantial disruption.

One of the main concerns is the flawed assumption that fishing activities can be relocated without repercussions. There is a notable lack of evidence regarding the availability and accessibility of alternative fishing grounds that can bear additional pressures. This critical omission raises the risk of overfishing in other areas and could lead to broader economic repercussions for the local fishing fleet. The absence of a comprehensive assessment impedes a true understanding of the impacts on fisheries and local livelihoods.

The proposal also poses significant threats to marine species, particularly due to the underwater noise associated with construction activities. The use of high-energy hammer piling over an extended duration is likely to create disturbances that affect marine life, notably the local bottlenose dolphin population. Concerns have been raised about the anticipated disturbance to a significant portion of this population, yet the application downplays these potential effects and lacks sufficient evidence to support

its claims.

Moreover, there is an apparent contradiction within the application itself. While it acknowledges the necessity of licences to allow harm to European Protected Species, it simultaneously characterises the impacts as negligible. This inconsistency undermines the credibility of the assessment and raises serious questions about compliance with the Habitats Regulations, particularly where anticipated harm requires legal authorisation.

The assessment does not adequately account for cumulative impacts from various pressures, such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without a detailed consideration of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application falls short of demonstrating compliance with the National Planning Framework 4 and the National Marine Plan. It does not sufficiently prove that the proposed development can coexist with current marine users or avoid significant adverse effects on marine biodiversity, thereby failing to support the notion of sustainable development.

Overall, the absence of concrete evidence regarding fishing displacement, the underestimation of acoustic impacts, and the contradictions found within the assessment lead to a conclusion that is incomplete and unreliable. These shortcomings hinder a thorough evaluation of the implications for marine life and local fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The project involves significant onshore infrastructure, which has been inadequately assessed, leading to an incomplete understanding of the impacts associated with what constitutes a single integrated project. The offshore turbines and onshore works are closely interrelated; however, their separate assessments create a disjointed approach that fails to capture the full scale of environmental and socio-economic effects.

Onshore components include cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. These activities necessitate excavation in areas of deep peat, particularly within Barvas Moor, a vital carbon store and ecologically important habitat. The application does not provide a thorough assessment of these impacts, which hinders a complete understanding of the project's overall environmental footprint.

By omitting or delaying the evaluation of onshore impacts, the application obstructs a proper assessment of cumulative effects. The Environmental Impact Assessment

process mandates that all elements of a project be evaluated collectively, yet the distinct separation of offshore and onshore components means the overall effects on peatlands, habitats, and communities remain unclear.

There are notable risks to sensitive habitats, including machair systems and peatland environments that receive policy protection. The application fails to illustrate that impacts on these habitats have been fully appraised or that suitable avoidance measures have been enacted, thus creating a significant evidential gap in terms of biodiversity protection.

Concerns are also raised regarding the project's carbon balance. Disturbance of peatland has the potential to release stored carbon, thereby creating a carbon debt that contradicts renewable energy development objectives. The application does not sufficiently address this concern or demonstrate that the overall carbon balance is advantageous.

Furthermore, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is a lack of evidence indicating that the necessary consents or procedures have been initiated, which brings into question the feasibility and lawful execution of the project.

From a policy standpoint, the failure to evaluate the project as a cohesive entity and to show adequate protection for peatlands, habitats, and land use interests contradicts the National Marine Plan and National Planning Framework 4. The inability to prove that impacts can be avoided or mitigated further weakens the application.

In summary, the disjunction between project components, the absence of a comprehensive assessment, and the lack of substantiated evidence regarding environmental and land use impacts render this segment of the application incomplete and unreliable, preventing a lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the essential criteria of sustainable development when evaluated against legal obligations, national policies, and evidence-based standards. It echoes the central concerns that led to the denial of the Lewis Wind Power proposal in 2008, which deemed the level of industrialisation unacceptable. This current application, however, comes under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing.

A reliable evidential basis for determining the application is lacking. There are

substantial gaps in baseline data, the use of an unclear design envelope, unarticulated reliance on mitigation measures, and the exclusion of critical impact pathways such as nocturnal wildlife, complete onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment remains incomplete, hindering a full understanding of the likely significant effects or residual impacts.

Procedural shortcomings are also evident. The failure to provide a compliant Island Communities Impact Assessment breaches the statutory requirements under the Islands (Scotland) Act 2018, while the lack of a full Social Impact Assessment constitutes a significant omission. These shortcomings obstruct the competent authority's ability to evaluate effects on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

In addition, the proposal contradicts National Planning Framework 4. It does not demonstrate adequate protection of biodiversity, natural environments, and cultural heritage, fails to illustrate that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. Furthermore, the cumulative impact of both offshore and onshore components has not been appropriately assessed, obscuring effects on peatlands, carbon balance, habitats, and crofting land.

There are unresolved environmental risks that remain uncertain and potentially serious. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and occasionally inconsistent. The necessary evidential threshold to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful conclusion regarding acceptable impacts.

The proposal would lead to significant and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual connections, and the negative impacts on tourism are permanent effects that cannot be effectively mitigated.

In summary, the application is procedurally and substantively inadequate for determination. The magnitude of information deficiencies, coupled with conflicts with policy and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority must either refuse consent based on these grounds or utilise the relevant regulatory provisions to mandate the submission of the missing information.

Therefore, a formal request is made for the complete refusal of the application for the Spiorad na Mara Offshore Wind Farm.

Additional Comments

This is yet another unnecessary project which is likely to have an extremely detrimental effect on the environment. Scotland already has too many windfarms which are continually having to be constrained off due to grid inadequacy. The effects of offshore windfarms on the environment have yet to be fully investigated. It is long past the time for a moratorium on all such developments until the potential impacts and whether or not any significant benefits will come from them Jhave been assessed.