

Member of Public 231

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 basis for this objection stems from a review of the Environmental Impact Assessment Report and accompanying documentation, highlighting significant planning, environmental, cultural, and procedural deficiencies.

The location of the proposed development off the west side of the Isle of Lewis is notable for its Atlantic-facing coastline and near-pristine environment, as well as its strong cultural identity. Concerns arise from the scale, proximity, and design of the proposal, which raises questions about its alignment with statutory requirements, national policy, and sustainable development principles.

A critical issue with the application is the lack of adequate evidential support for a lawful determination. Missing environmental data, limited and inconsistent baseline information, and undefined key aspects of the proposal hinder a clear understanding of the likely significant effects. The flexible design framework employed does not provide clarity, and the reliance on unspecified mitigation measures means their effectiveness cannot be evaluated. Consequently, the documentation fails to enable a comprehensive understanding of the environmental, cultural, or community impacts, with claims of negligible or non-significant effects lacking robust evidence.

Moreover, there are substantial conflicts with policy. The proposal appears at odds with 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 adequately demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. These conflicts directly impact the statutory tests required for consent, undermining the competent authority's ability to assess the development as acceptable in policy terms.

The unprecedented scale of the proposal, with large turbines situated near the shoreline, raises significant concerns about landscape capacity, visual dominance, and environmental impact. Taken together, the lack of sufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicate

that the application is incomplete and unable to support a lawful determination. In light of these issues, the precautionary principle must be invoked.

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 assessment of marine ecology and protected species is fundamentally flawed, failing to provide a thorough understanding of the ecological receptors in the West Lewis coastal area. This region is particularly sensitive and biologically rich, yet the baseline data is incomplete, and the methodologies used do not accurately capture species presence, behaviour, and habitat use. Consequently, the assessment lacks a reliable evidential basis for evaluating potential impacts.

A significant oversight involves otters, a European Protected Species, where the application does not adequately recognise or assess their active utilisation of coastal regions for foraging and movement. The omission of their core foraging range and behavioural patterns results in an inadequate evaluation of how construction disturbance, noise, and increased activity could affect them. This undermines the conclusions drawn regarding the lack of significant effects on this species.

Further shortcomings are evident in the assessment of basking sharks, where the reliance on aerial surveys leads to substantial detection bias, particularly in Atlantic conditions. This methodology is likely to underestimate the presence of these sharks, especially when compared to established land-based observations indicating their frequent use of these waters. The failure to incorporate or appropriately consider such data results in an incomplete baseline, thereby diminishing the reliability of the conclusions reached.

These methodological shortcomings imply that the claims of negligible or non-significant effects are based more on assumptions than on solid evidence. The lack of adequate baseline data also hinders a meaningful assessment of cumulative and indirect impacts, including seasonal changes and broader ecosystem interactions. This uncertainty raises concerns about the actual level of risk to marine species and habitats.

From a regulatory standpoint, the application does not comply with the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been properly identified or assessed. The uncertainty introduced by these deficiencies makes it impossible 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, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These issues prevent a thorough evaluation of impacts on marine ecology and protected species, leading to the overall conclusion that the application lacks a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. The ornithological assessment associated with the development is materially flawed, containing significant gaps in evidence and internal inconsistencies that undermine its conclusions. There is a critical failure to demonstrate that these species will not be adversely affected by the proposed development, which is situated within key foraging areas and migratory pathways. The assessment does not adequately evaluate the implications of displacement, collision risk, or habitat loss for these seabirds.

A fundamental contradiction arises in the application, where the developer claims no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, a process that is only necessary when significant harm is anticipated. This inconsistency raises serious concerns about the reliability of the assessment, suggesting that the conclusions drawn are not supported by robust evidence. Furthermore, the assessment fails to provide sufficient proof 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 not thoroughly acknowledged, and the reliance on modelling approaches introduces uncertainty, particularly regarding species in critical decline, such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, especially given the incomplete baseline data and inadequate understanding of behavioural responses.

Moreover, the siting of turbines within a recognized migratory corridor poses an additional and significant risk, effectively creating a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application lacks a comprehensive assessment of the long-term implications of continued mortality within this corridor and fails to consider the potential effects on species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold required to assert no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with data deficiencies and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been met.

This necessitates the application of the precautionary principle, which hampers a lawful conclusion in support of consent. Additionally, the identified deficiencies indicate non-compliance 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 assessment is rendered unreliable due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. These shortcomings hinder a comprehensive evaluation of impacts, leading to the conclusion that the application does not satisfy the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment concerning cultural heritage and community identity is profoundly insufficient, overlooking the West Lewis coastline as a dynamic cultural landscape where language, environment, tradition, and community are deeply intertwined. It adopts a simplistic view, treating heritage merely as isolated, static assets instead of recognising their continuous social, cultural, and spiritual relevance within the community.

Particularly concerning is 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 they are categorised merely as static features in the assessment. This neglects their ongoing use and significance, as well as the potential impact of development on their surroundings. Such mischaracterisation leads to an incomplete evaluation of cultural effects and fails to acknowledge their vital role in community life.

Furthermore, the application neglects to consider intangible cultural heritage, including the Gaelic language, local traditions, and the community's enduring relationship with the coastal environment. These elements are integral to the area's identity but are entirely omitted from the assessment, marking a significant gap. Without taking these factors into account, it is impossible to fully grasp the cultural impact of the proposed development.

Additional worries arise regarding community rights and engagement. The Gaelic-speaking population embodies a unique cultural identity that aligns with the characteristics of an Indigenous People. However, no process of Free, Prior and Informed Consent has taken place, which undermines the credibility of the assessment and fails to adhere to established principles regarding participation in decisions that affect cultural and environmental interests.

A crucial procedural flaw is the lack of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the responsible authority cannot meet its legal obligations to evaluate the social, cultural, and economic ramifications for the island community. This omission alone renders any determination unlawful.

From a policy standpoint, these shortcomings place the proposal in direct contradiction to National Planning Framework 4, especially regarding the safeguarding of historic assets and places. The failure to account for both tangible and intangible heritage, alongside the neglect of living cultural practices, signifies a clear deviation from policy expectations.

Ultimately, the lack of assessment concerning living heritage, intangible cultural value, community rights, and adherence to statutory obligations creates a significant evidential void. The cultural ramifications of the development remain unassessed, and the application fails to offer a solid foundation for understanding the true cultural cost of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. The introduction of large-scale turbines in close proximity to the shoreline would result in a continuous and dominant 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 is materially deficient, failing to adequately reflect the scale of change or the sensitivity of the receiving environment.

The proposal does not accurately represent the magnitude of visual change. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and eroding the defining qualities of naturalness and remoteness. The assessment inadequately conveys the significance of these impacts within such a sensitive landscape.

Methodological concerns arise regarding the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not fully encapsulate the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the risk that the magnitude of visual impact has been understated, undermining the assessment's reliability.

A critical deficiency exists in the failure to consider the interconnected relationship

between landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting interlinked by visual and spatial relationships with the Atlantic horizon. The assessment treats these heritage assets as isolated entities rather than recognising their interdependence, leading to an incomplete evaluation of impacts on their setting and cultural significance.

The industrialisation of the seascape would sever these essential relationships, altering the context in which heritage assets are experienced and disrupting their connection to the natural horizon. This denotes not just a visual impact but also a broader cultural and spatial harm that has not been adequately assessed within the application.

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

Moreover, it is evident that the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines ensure their presence would be dominant and unavoidable. Consequently, the resulting change is fundamental and permanent, unable to be reduced to an acceptable level through mitigation measures.

Overall, the assessment fails to accurately reflect the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These significant deficiencies prevent a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks adequate assessment regarding construction and pollution risks, failing to provide sufficient detail necessary for evaluating potential environmental effects. Significant seabed preparation and installation works are planned within the high-energy Atlantic environment, yet 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, which hampers any meaningful assessment of their effectiveness or adequacy.

This reliance on unspecified future measures is particularly alarming, considering the sensitivity of the receiving environment. The West Lewis coastline is known for its clean coastal waters and vital habitats, which are susceptible to sediment disturbance and contamination. Although the application recognises risks like sediment mobilisation

and accidental chemical or oil spills, it falls short in detailing how these risks will be prevented, controlled, or monitored.

Furthermore, there is significant uncertainty surrounding the scale and behaviour of sediment plumes that could result from seabed disturbance and cable installation. Without robust modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological implications of these impacts. This uncertainty also extends to potential effects on marine species and habitats, which have been identified as sensitive within the broader assessment.

Compounding these concerns is the lack of detailed emergency response procedures. By postponing contingency planning until after consent, the application obstructs the evaluation of whether suitable safeguards are in place to tackle pollution incidents. This situation introduces procedural risk and undermines the capacity of the competent authority to properly assess environmental protection measures at the point of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation measures are assessed prior to consent, and the absence of such critical information renders a lawful determination impossible. The application also fails to demonstrate adherence to policy requirements regarding environmental protection and water quality.

Overall, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts collectively render the assessment fundamentally deficient. These inadequacies hinder a thorough evaluation of construction and pollution risks and further reinforce 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 an active fishing industry. However, the application fails to adequately evaluate the ecological and socio-economic impacts, raising significant concerns regarding the protection and maintenance of these vital uses and habitats. The assessment lacks a comprehensive analysis of how these activities can coexist without substantial disruption.

A critical concern is the assumption that fishing activities can be displaced without adverse consequences. The application does not provide evidence that alternative fishing grounds are available or suitable for supporting the additional pressure that

displacement would create. This lack of evidence is troubling, as it could lead to overfishing in other areas, resulting in wider economic repercussions for the local fishing fleet. Consequently, the impacts on fisheries and livelihoods remain poorly understood due to the absence of a clear, evidence-based assessment.

Furthermore, the proposal poses considerable risks to marine species, particularly due to underwater noise generated during construction activities. The use of high-energy hammer piling over an extended period is anticipated to cause disturbances across considerable distances, which may affect species such as dolphins. The predicted disturbance to a significant proportion of the local bottlenose dolphin population is a serious concern, yet the application inadequately addresses these impacts, lacking sufficient supporting evidence.

The assessment reveals a contradiction in acknowledging the necessity for licences to permit harm to European Protected Species while simultaneously characterising the impacts as negligible. This inconsistency undermines the credibility of the assessment and raises questions regarding compliance with the Habitats Regulations, particularly when harm is expected to a degree that necessitates legal authorisation.

Moreover, the assessment does not adequately consider cumulative impacts arising from multiple factors, including habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough 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 compliance with the National Planning Framework 4 or the National Marine Plan. It fails to establish that the proposed development can coexist with current marine users or prevent unacceptable impacts on marine biodiversity, thus preventing a conclusion that the proposal embodies sustainable development.

In summary, the deficiencies in the evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal inconsistencies within the application collectively render the assessment incomplete and unreliable. These shortcomings hinder a thorough evaluation of the impacts on marine life and fisheries.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife in the Environmental Impact Assessment represents a significant evidential gap. The West Lewis coastline is noted for its exceptionally dark skies, which are essential to the region's environmental quality, cultural identity, and tourism potential. The proposed

development would introduce permanent red aviation lighting, which would be visible over considerable distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon, thereby fundamentally altering the night-time environment.

The application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This gap is particularly notable given the significance of dark skies to the area's identity and the growth of tourism sectors, such as astro-tourism. The neglect of these impacts represents a shortfall in the overall landscape and environmental assessment.

Moreover, there is no analysis of the impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting, which can result in disorientation and heightened collision risks. The application does not include any lighting impact assessment or phototaxis study, thereby failing to assess the potential effects of aviation lighting on these species and the risk of increased mortality.

This deficiency is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not account for nocturnal activity or related risks. Other species, such as Kittiwakes, which may forage or migrate at night, are similarly vulnerable to disorientation due to artificial lighting, yet this risk has not been addressed. The lack of site-specific night-time data creates a substantial gap in understanding the ecological impacts.

In the absence of an evaluation of nocturnal impacts, it remains impossible to ascertain whether protected species or designated sites would be adversely affected. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt is not satisfied, invoking the precautionary principle and hindering a lawful determination.

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

In summary, the lack of any assessment concerning dark skies and nocturnal wildlife signifies a major evidential deficiency. The absence of baseline data, impact modelling, and species-specific analysis renders the application incomplete and unable to facilitate a lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the standards of sustainable development as mandated by statutory duties, national policy, and evidential requirements. This application brings forth the same core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was clearly highlighted. Now, it is presented within a stronger policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

The evidential basis for the determination of this application is neither complete nor reliable. It suffers from critical gaps in baseline data, the use of an undefined design envelope, an over-reliance on unspecified mitigation measures, and a failure to address key impact pathways such as nocturnal wildlife, the full scope of onshore infrastructure, and the effects on tourism. Consequently, the Environmental Impact Assessment is incomplete, leaving significant effects and residual impacts inadequately understood.

Moreover, there are notable procedural failures present. The lack of a compliant Island Communities Impact Assessment is a breach of statutory duty under the Islands (Scotland) Act 2018, and the omission of a comprehensive Social Impact Assessment is a serious material shortcoming. These gaps hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for a lawful determination.

In direct contradiction to National Planning Framework 4, the proposal fails to provide evidence of biodiversity protection, preservation of natural places, and safeguarding of cultural heritage. It does not substantiate 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 impacts of both offshore and onshore elements have not been adequately assessed, obscuring their effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also inconsistent in parts. The evidential threshold necessary to confidently exclude adverse effects has not been achieved, thereby invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of the impacts.

Additionally, the proposal would lead to substantial and irreversible changes in a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual relationships, along with the impacts on

tourism, represent permanent changes that cannot be adequately mitigated.

Taken as a whole, the application is procedurally and substantively unfit for determination. The extent of informational deficiencies, combined with policy conflicts and unresolved environmental risks, obstruct a lawful and evidence-based decision. The competent authority must either refuse consent based on these grounds or invoke relevant regulatory provisions to demand the submission of the missing information.

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

Additional Comments

Personally I am in favour of wind power - but it's a question of scale. The proposed development is, in my opinion, too big. The environmental impact does not seem to be investigated and I question that, with the size planned, how useable the scheme will be. I don't see local benefits or gain and think the local environment is being sacrificed for the benefit of external investment. I question just how 'green' the whole development actually will be. The concrete and fibre glass are not recyclable and have a very limited lifespan- I'm not impressed by the outcome of the Viking project- and that is land based- yet beset by problems

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Objection To Spiorad na Mara Offshore Wind Farm

References: MD-00011742 & MD-00011743

Dear Sir/Madam

This representation 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. A review of the Environmental Impact Assessment Report and its supporting documentation reveals significant material deficiencies in planning, environmental consideration, cultural aspects, and procedural adherence. The project 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 arise regarding the scale, proximity, and design of the proposal, particularly regarding its alignment with statutory requirements, national policy, and sustainable development principles.

The application does not provide an adequate evidential basis for lawful determination, as critical environmental data is absent, baseline information is both limited and inconsistent, and essential elements of the proposal remain undefined. The flexible design framework used hinders a clear understanding of potential significant effects. Furthermore, the reliance on unspecified mitigation measures makes it impossible to assess their effectiveness. Consequently, the documentation fails to facilitate a comprehensive understanding of environmental, cultural, or community impacts, and claims regarding negligible or non-significant effects lack robust evidence.

Substantial policy conflicts are evident. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment requirements, and National Planning Framework 4, especially concerning biodiversity, natural spaces, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. These conflicts are directly related to the statutory tests necessary for consent and compromise the competent authority's ability to ascertain the development's acceptability within policy parameters.

The unprecedented scale of the proposal, with large turbines situated in close proximity to the shoreline, raises significant 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 must be applied.

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.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's commissioned Social Impact Assessment, which involved focus groups with local residents, has not been published in full, creating a significant evidential gap. This lack of transparency hinders both public understanding and the competent authority's ability to assess the social risks identified in the developer's own research. Summaries indicate that residents are currently experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement and should not be regarded as speculative; however, the failure to disclose the complete assessment restricts proper scrutiny and limits the evaluation of their significance in the decision-making process.

Furthermore, the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. Despite this acknowledgment, these impacts have not been adequately integrated into the main application or given due consideration. The withholding of the complete Social Impact Assessment obfuscates the true human and social costs associated with the development.

This lack of transparency also compromises the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning are at stake. The absence of the full dataset means that the application does not provide a complete evidential basis necessary for evaluating the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Developments must promote positive health outcomes and mitigate harm, yet the existing evidence points to adverse effects that remain undisclosed. Without the full assessment, it is impossible to verify compliance with this policy.

The procedural ramifications are considerable. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the complete 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 failure to disclose the full Social Impact Assessment, alongside evidence of existing adverse impacts, results in an incomplete and unreliable assessment. This inadequacy obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual impacts on the West Lewis coastline is fundamentally inadequate, failing to capture the significant scale of change and the sensitivity of the surrounding environment. This coastline is characterised by its unspoiled Atlantic horizon, undeveloped nature, and a profound sense of remoteness. The introduction of large-scale turbines close to the shoreline would create an overwhelming industrial presence that would fundamentally change this character and lead to a permanent transformation of the landscape.

Furthermore, the application does not sufficiently address the extent of this visual change. The turbines' size and proximity would dominate the views from residential areas, historic sites, and popular coastal locations, leading to a detrimental impact on visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment inadequately conveys the significance of these impacts within the context of such a delicate landscape.

There are also significant methodological issues regarding the selection and depiction of visual viewpoints. Evidence indicates that these viewpoints may not accurately 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 true magnitude of visual impact has been minimised, calling into question the reliability of the assessment.

Additionally, the assessment neglects to consider the interconnectedness of landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments are part of a larger landscape context that is visually and spatially linked to the Atlantic horizon. Treating these sites as isolated assets fails to acknowledge their interdependence, leading to an incomplete evaluation of the impacts on their cultural significance and setting.

The industrialisation of the seascape would disrupt these connections, altering how heritage assets are experienced and severing their ties to the natural horizon. This represents not only a visual concern but also a broader cultural and spatial detriment that has not been adequately addressed in the application.

From a policy standpoint, the proposal directly contravenes National Planning Framework 4 concerning the protection of natural environments and historic assets. The magnitude of change is incompatible with the need to preserve landscape character, visual amenity, and the setting of culturally significant sites. Moreover, the absence of a comprehensive worst-case assessment further weakens any argument for policy compliance.

It is evident that the impacts identified cannot be effectively mitigated. Given the turbines' scale, height, and proximity, their presence would be prominent and unavoidable. Consequently, the resulting change is fundamental and permanent, unable to be reduced to an acceptable level through mitigation efforts.

In summary, the assessment falls short of accurately depicting the scale of impact, the environmental sensitivity, and the interrelation of landscape and heritage. These shortcomings hinder a dependable evaluation and underscore the conclusion that the proposal is incompatible with the preservation of this landscape.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development when evaluated against national policy, statutory duties, and evidential standards. This situation mirrors the core issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. The current application, although framed within a stronger policy context that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, does not substantiate its claims.

There are significant deficiencies in the evidential basis for the application, including critical gaps in baseline data and the use of an undefined design envelope. Furthermore, it relies on unspecified mitigation measures and fails to address key impact pathways, such as those affecting nocturnal wildlife, the full scope of onshore infrastructure, and tourism impacts. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of likely significant effects or residual impacts.

The application also suffers from procedural inadequacies. Notably, the lack of a compliant Island Communities Impact Assessment is a breach of statutory duty as stipulated under the Islands (Scotland) Act 2018. Additionally, the omission of the complete Social Impact Assessment represents a material shortfall. 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 stands in direct opposition to National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural landscapes, and cultural heritage. It fails to illustrate acceptable health and wellbeing impacts and cannot provide evidence of net economic benefits, particularly due to the lack of tourism impact modelling. The cumulative impacts of both offshore and onshore components have not been properly assessed, leading to obscured effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially severe. The assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and exhibit internal inconsistencies. The evidential standard needed to rule out adverse effects beyond reasonable scientific doubt has not been achieved, engaging the precautionary principle and barring a lawful conclusion regarding the acceptability of impacts.

Additionally, 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, disruption of cultural and visual relationships, and negative impacts on tourism represent permanent changes that cannot be adequately mitigated.

In summary, the application is fundamentally unfit for determination both procedurally and substantively. The extensive information gaps, combined with conflicts with policy and unresolved environmental risks, obstruct a lawful and evidence-based decision-making process. The competent authority must either refuse consent based on these grounds or invoke the appropriate regulatory provisions to require the submission of the missing information.

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

Additional Comments

I would like to submit my personal objection to this proposal which will have a hugely detrimental impact on this beautiful and unscarred area of the west coast of Lewis. Both my parentss were from the west coast, Shawbost, and I visit regularly.

I have concerns that the impact on marine and other wildlife have not been properly assessed and the project could not in all conscience be justified if they had been.

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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 in accordance with marine licensing and Environmental Impact Assessment procedures. A thorough review of the Environmental Impact Assessment Report and accompanying materials reveals significant deficiencies in planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west coast of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. Concerns arise regarding the compatibility of the project's scale, proximity, and design with statutory requirements, national policy, and sustainable development principles.

The application lacks a robust evidential basis necessary for a lawful determination. Essential environmental data is missing, baseline information is either limited or inconsistent, and crucial components of the proposal remain undefined. The adoption of a flexible design framework complicates the assessment of likely significant effects, and the reliance on unspecified mitigation measures hampers the evaluation of their potential effectiveness. Consequently, the documentation fails to provide a comprehensive or informed perspective on the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by credible evidence.

There are evident and substantial conflicts with existing policies. The proposal is at odds with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health and wellbeing. It does not adequately demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts are critical as they directly pertain to the statutory tests required for consent and challenge the ability of the competent authority to ascertain the development's acceptability from a policy standpoint.

The scale of this proposal is unprecedented for the area, with large turbines sited in close proximity to the shoreline, raising significant concerns about landscape capacity, visual impact, and environmental consequences. Collectively, the lack of sufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy violations highlight that the application is incomplete and unable to

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed, lacking a comprehensive and transparent account of the anticipated environmental effects associated with the proposal. The introduction of a flexible Project Design Envelope, which does not commit to definitive turbine dimensions, layouts, or configurations, generates considerable uncertainty. This uncertainty hinders the application of a worst-case scenario analysis and compromises the integrity of the assessment.

Consequently, the potential impacts presented may not accurately reflect the actual development, thereby preventing both the public and the competent authority from grasping the true scale of environmental effects.

Moreover, the application places significant reliance on yet-to-be-defined mitigation measures, monitoring strategies, and management plans. Seeking consent under these conditions implies that environmental harm will be addressed subsequently, which obstructs any meaningful assessment of effectiveness and residual impacts. This postponement of critical information to post-consent stages is procedurally unacceptable and contradicts the intent of the Environmental Impact Assessment regime, which stipulates that significant effects and mitigation strategies must be clearly established prior to determination.

There are notable evidential shortcomings as well, including gaps in baseline data, methodological limitations, and a tendency to rely on assumptions instead of site-specific evidence. These issues result in uncertainty concerning the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are made without robust supporting data. The lack of adequate information obscures a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that fails to comply with statutory requirements.

As a result, the application does not fulfil the evidential threshold mandated by the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly regarding protected species and sensitive habitats. The proposal additionally does not demonstrate adherence to National Planning Framework 4, as it is unable to show 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 measures, and gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These significant

deficiencies preclude a lawful and robust assessment of environmental effects, leaving the competent authority incapable of making an informed decision based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed development has significant shortcomings in its assessment of marine ecology and protected species, which ultimately undermines understanding of the ecological receptors within the West Lewis coastal environment. This region is known for its sensitive and biologically active marine system; 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 reliable evidential basis for evaluating potential impacts.

A major gap exists in the analysis concerning otters, a European Protected Species. The application neglects to properly acknowledge and assess their active utilisation of coastal areas for foraging and movement. This oversight means that the evaluation of potential effects from construction disturbance, noise, and increased activity is insufficient, which calls into question the conclusions drawn regarding the absence of significant effects on this species.

Further concerns arise regarding the assessment of basking sharks, as the reliance on aerial surveys introduces considerable detection bias, particularly in challenging Atlantic conditions. This method is likely to underestimate their presence, especially when compared with established land-based observations that indicate frequent utilisation of these waters. The failure to adequately incorporate or consider such data results in an incomplete baseline and diminishes the credibility of the conclusions offered.

These methodological flaws mean that any conclusions regarding negligible or non-significant effects are based more on assumptions than on solid evidence. The lack of adequate baseline data also hampers the meaningful assessment of cumulative and indirect impacts, including those related to seasonal variations and broader ecosystem interactions. This generates uncertainty about the actual level of risk posed 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 has not properly identified or assessed protected species. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, necessitating the application of the precautionary principle. Under these circumstances, it is clear that consent cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unfounded conclusions renders the assessment unreliable. These weaknesses hinder a thorough evaluation of the impacts on marine ecology and protected species, contributing to the overall determination that the application does not possess a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the ornithological assessment associated with this application is significantly flawed, presenting substantial gaps in evidence and internal inconsistencies that undermine its conclusions. The development is situated within key foraging areas and migratory pathways, yet the assessment does not adequately evaluate the potential implications of displacement, collision risk, or habitat loss for these species.

A critical contradiction arises within the application, as the developer asserts there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is necessitated only when significant harm is anticipated. This inconsistency raises questions about the assessment's reliability and suggests that the conclusions drawn are not substantiated by the supporting evidence. Furthermore, the assessment fails to provide sufficient information regarding the seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, and does not fully consider the importance of these feeding grounds. The reliance on modelling approaches introduces further uncertainty, especially for species that are in severe decline, such as Kittiwakes and Fulmars. The methodologies used likely underestimate mortality rates, particularly where baseline data is lacking and behavioural responses remain unclear.

The placement of turbines within a recognised migratory corridor adds another layer of significant risk, effectively creating a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The assessment does not adequately address the long-term implications of sustained mortality in this corridor or the potential consequences for species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to determine no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data deficiencies and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been fulfilled. This invokes the precautionary principle and prevents a lawful conclusion in favour of consent. Additionally, the identified deficiencies constitute 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 remain unaffected places the proposal at odds with national policy.

Overall, the assessment is unreliable due to internal inconsistencies, methodological weaknesses, and a lack of sufficient evidence. These issues hinder a thorough evaluation of impacts and contribute to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

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.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of seascape, landscape, and visual impacts lacks comprehensiveness and does not fully capture the extent of change or the sensitivity of the surrounding environment. The character of the West Lewis coastline is characterised by its open Atlantic horizon and undeveloped nature, contributing to a strong sense of remoteness. The proposed large-scale turbines 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 fails to accurately depict the scale of visual change. Given their size and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This dominance would negatively affect visual amenity and diminish the defining qualities of naturalness and remoteness. The assessment does not effectively convey the significance of these impacts within such a sensitive landscape.

Methodological issues arise regarding the chosen visual viewpoints. There is evidence that the viewpoints may not represent the most sensitive receptors or extreme scenarios, particularly concerning important cultural heritage sites and valuable landscapes. This raises concerns that the visual impact may have been underestimated, compromising the assessment's reliability.

Additionally, the assessment does not account for the interconnectedness of landscape, seascape, and cultural heritage. Notably, sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a wider landscape connected visually and spatially to the Atlantic horizon. Treating these sites as separate entities ignores their interdependence and results in an inadequate analysis of the impacts on

their cultural significance and setting.

The industrialisation of the seascape would disrupt these connections, changing the context in which heritage assets are perceived and severing their ties to the natural horizon. This not only represents a visual impact but also entails broader cultural and spatial damage that has not been sufficiently evaluated in the application.

From a policy standpoint, the proposal contradicts the National Planning Framework 4, particularly in terms of protecting natural areas and historical assets. The magnitude of change is at odds with the need to preserve landscape character, visual amenity, and the contexts of culturally important sites. The lack of a thorough worst-case scenario assessment further weakens any claims of adherence to policy.

It is evident that the identified impacts cannot be effectively mitigated. Given the turbines' scale, height, and proximity, their presence would be dominant and unavoidable. The resulting changes are fundamental and permanent, unable to be reduced to an acceptable level through mitigation efforts.

In summary, the assessment does not accurately reflect the scale of impact, the sensitivity of the environment, and 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 incomplete assessment of construction and pollution risks raises significant concerns regarding the potential environmental effects of the proposal. The project necessitates extensive seabed preparation and installation works in a high-energy Atlantic environment. However, the absence of fully developed Construction Environmental Management Plans or Pollution Prevention Plans limits the ability to evaluate the proposed mitigation and contingency measures, which are deferred until after consent is granted. This reliance on future, undefined measures is particularly alarming given the sensitivity of the receiving environment.

The West Lewis coastline, known for its clean coastal waters and vital habitats, is susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on preventive, control, or monitoring measures. Moreover, the uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation further complicates the assessment. Without rigorous modelling and clearly defined management strategies, it remains impossible to ascertain the extent, duration, or ecological effects of these

impacts. This uncertainty also pertains to the potential effects on marine species and habitats 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 obstructs the evaluation of whether adequate safeguards are in place to address pollution events. This approach introduces procedural risks and undermines the capacity of the competent authority to assess environmental protection measures at the determination stage.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be evaluated prior to consent, and the absence of such information renders a lawful determination impossible. Additionally, the application does not 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 regarding potential impacts culminate in a materially deficient assessment. These inadequacies hinder a thorough evaluation of construction and pollution risks, supporting the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents a concerning lack of robust evaluation regarding fisheries and marine life, failing to adequately assess the ecological or socio-economic impacts that may arise from the proposed development. The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry, yet the application does not convincingly demonstrate how these critical habitats and industries can be preserved or sustained without considerable disruption.

One significant issue lies in the assumption that fishing activities can be displaced without repercussions. The absence of evidence indicating that alternative fishing grounds are both available and capable of accommodating the added pressure is a critical flaw. This oversight has the potential to lead to overfishing in different areas, which could adversely affect the local fishing fleet's economic stability. Without a thorough and evidence-based evaluation, understanding the impacts on fisheries and livelihoods remains elusive.

Moreover, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated during construction activities. The use of high-energy

hammer piling over an extended period is expected to disturb marine life across large distances, notably impacting species such as dolphins. The anticipated disruption to a considerable portion of the local bottlenose dolphin population raises serious concerns; however, the application tends to minimise the significance of these impacts without adequate supporting evidence.

There exists an inconsistency within the application itself, acknowledging the requirement for licences to permit harm to European Protected Species while simultaneously describing such impacts as negligible. This contradiction calls into question the credibility of the assessment and raises compliance issues with the Habitats Regulations, especially given the anticipated harm that may necessitate legal authorisation.

Furthermore, the assessment neglects to consider cumulative impacts that could arise from multiple pressures, including habitat disturbance, noise, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is vital to ascertain 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 illustrate how the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thereby undermining any assertion that the proposal constitutes sustainable development.

In summary, the combination of insufficient evidence regarding fishing displacement, an underestimation of acoustic impacts, and internal inconsistencies renders the assessment inadequate and unreliable. These deficiencies hinder a thorough evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is fundamentally lacking, failing to encompass the comprehensive impacts associated with this singular integrated project. The offshore turbines and the onshore works are closely interconnected, yet they are evaluated in isolation, leading to a disjointed approach that obscures the magnitude of the environmental and socio-economic consequences.

Key onshore elements involve cabling across protected moorland, the construction of a substation in proximity to Stornoway, and the necessary access infrastructure across delicate landscapes. These activities entail excavation in areas of deep peat, particularly within Barvas Moor, which is vital as a significant carbon store and an ecologically sensitive habitat. The proposal does not provide an exhaustive assessment

of these impacts, obstructing a complete understanding of the project's environmental footprint.

By neglecting to assess the onshore impacts or postponing their evaluation, the application obstructs an accurate analysis of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered in unison; however, the fragmentation of offshore and onshore elements results in a lack of clarity regarding the combined impacts on peatlands, habitats, and local communities.

Significant risks are posed to sensitive habitats, such as machair systems and peatland environments, which benefit from policy protection. The application fails to illustrate that the impacts on these habitats have been thoroughly assessed or that appropriate avoidance strategies have been implemented, leading to a substantial evidential gap concerning biodiversity protection.

Concerns also arise regarding carbon balance. The disturbance of peatland has the potential to release stored carbon, thus creating a carbon debt that undermines the goals of renewable energy development. The application does not sufficiently address this matter or demonstrate that the overall carbon balance remains advantageous.

Moreover, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is a lack of evidence that the requisite consents or procedures have been commenced, which brings the deliverability and lawful execution of the project into question.

From a policy standpoint, the division of the project's assessment and the failure to demonstrate the protection of peatlands, habitats, and land use interests contravene the National Marine Plan and the National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further diminishes the application's validity.

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 aspect of the application incomplete and untrustworthy, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal introduces permanent red aviation lighting that would create a continuous and intrusive "wall of light" across the western horizon. This would fundamentally alter the night-time environment of the West Lewis coastline, which is known for its exceptionally dark skies. These dark skies are important for environmental quality,

cultural identity, and tourism value.

The application fails to assess the impact of this lighting on visual amenity, landscape character, or the experience of residents and visitors. This is particularly significant given the area's reliance on dark skies, which are vital for emerging sectors such as astro-tourism. The lack of consideration for these impacts creates a notable gap in the environmental assessment.

There is also no evaluation of the impacts on nocturnal wildlife. Certain species, including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, are sensitive to artificial lighting, which can cause disorientation and increase collision risks. The application does not include any lighting impact assessment or phototaxis study to determine how the aviation lighting may affect these species or increase mortality.

Furthermore, the ornithological assessment relies on daytime survey data, which fails to account for nocturnal activity or associated risks. Kittiwakes, for instance, which may forage or migrate at night, are vulnerable to disorientation from artificial lighting, yet this risk remains unassessed. The lack of site-specific night-time data leads to a significant gap in understanding ecological impacts.

Without assessing nocturnal impacts, it is impossible to ascertain whether protected species or designated sites may 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, the absence of this assessment conflicts with National Planning Framework 4, which aims to protect natural places and uphold environmental quality. This oversight also weakens the overall analysis of landscape and seascape impacts, as night-time character is a crucial aspect of the environment.

Overall, the lack of assessment regarding dark skies and nocturnal wildlife creates a substantial evidential gap. The absence of baseline data, impact modelling, and species-specific analysis makes the application incomplete and unable to support a lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the requirements of sustainable development when evaluated against statutory duties and national policy. It shares significant issues with the 2008 Lewis Wind Power proposal, which was rejected due to unacceptable industrialisation. Now, it is put forward under a

more robust policy framework that places greater emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

The application lacks a complete and reliable evidential basis. There are serious gaps in baseline data, reliance on an undefined design envelope, unspecified mitigation measures, and omitted key impact pathways, including nocturnal wildlife, full onshore infrastructure, and tourism effects. The Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of likely significant effects or residual impacts.

There are clear procedural shortcomings as well. The lack of a compliant Island Communities Impact Assessment breaches statutory duty under the Islands (Scotland) Act 2018, and the failure to disclose the complete Social Impact Assessment is a material omission. Such deficiencies hinder the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Furthermore, the proposal contradicts National Planning Framework 4. It does not demonstrate protection of 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 missing tourism impact modelling. The cumulative effects of both offshore and onshore components have not been adequately assessed, obscuring impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in places. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been met, thus invoking the precautionary principle and preventing a lawful conclusion that impacts are acceptable.

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 effects that cannot be adequately mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The significant information deficiencies, alongside policy conflicts and unresolved environmental risks, preclude a lawful and evidence-based decision. The competent authority must either refuse consent on these grounds or invoke the relevant regulatory provisions to require 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 am from Lewis, where the protection of its land and sea is something the islanders have always held dear. Erecting these wind farms off its coast, will bring catastrophe to the environment and the islands heritage. The islanders will not gain from these farms but the companies in charge, will. The waters around the Hebrides are unspoilt, so please leave them that way.

Member of Public 234

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 marine licensing and Environmental Impact Assessment frameworks. A thorough examination of the Environmental Impact Assessment Report and associated documentation reveals significant deficiencies in planning, environmental considerations, cultural aspects, and procedural matters. The proposed development is situated off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, relatively unspoiled environment, and strong cultural identity. The design, proximity, and scale of the proposal raise serious questions about its alignment with statutory obligations, national policies, and sustainable development principles.

The application does not present a sufficient evidential basis for a lawful decision. There are gaps in critical environmental data, the baseline information provided is both limited and inconsistent, and many crucial elements of the proposal remain undefined. The flexible design framework employed obscures the understanding of potential significant effects, while the reliance on unspecified mitigation measures renders their effectiveness unassessable. Consequently, the documentation fails to allow for a comprehensive understanding of the environmental, cultural, or community implications, and the assertions of negligible or non-significant effects lack robust evidential support.

There are evident and significant policy discrepancies as well. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment guidelines, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not demonstrate that national obligations to safeguard biodiversity, climate considerations, and environmental integrity are achievable. Such discrepancies directly impact the statutory tests needed for consent and compromise the ability of the competent authority to determine the proposal's acceptability under policy frameworks.

The unprecedented scale of the proposal, with large turbines located in close proximity to the shoreline, raises substantial concerns about landscape capacity, visual impact, and environmental consequences. Collectively, the lack of adequate information, dependence on undefined mitigation strategies, evidential shortcomings, and clear

policy violations indicate that the application is incomplete and cannot substantiate a lawful determination. In light of these factors, the precautionary principle is imperative.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is inadequate, failing to provide a complete and reliable understanding of ecological receptors in this sensitive marine area. The methodologies employed do not effectively capture crucial aspects such as species presence, behaviour, and habitat use, leading to an incomplete baseline dataset. This deficiency undermines the foundation necessary for evaluating potential impacts.

A notable oversight is the assessment of otters, which are classified as a European Protected Species. The application neglects to properly acknowledge their active use of coastal regions for foraging and movement. Consequently, the assessment lacks consideration of their core foraging range and behavioural patterns, leaving the potential impacts of construction disturbance, noise, and increased human activity unassessed. This failure to evaluate these factors calls into question any conclusions drawn regarding the absence of significant effects on otters.

The evaluation of basking sharks also presents significant deficiencies, as the reliance on aerial surveys introduces substantial detection bias, particularly under Atlantic conditions. This method likely underestimates the presence of these sharks, especially when compared to established land-based observations that demonstrate their frequent utilisation of these waters. The lack of incorporation of such data contributes to an incomplete baseline, further undermining the reliability of the conclusions presented.

As a result of these methodological shortcomings, the claims of negligible or non-significant effects are based more on assumptions than on solid evidence. Additionally, the insufficiency of baseline data hampers the ability to assess cumulative and indirect impacts effectively, which encompass seasonal variations and broader ecosystem interactions. This situation generates uncertainty about the actual risks posed to marine species and their habitats.

Regulatory compliance issues arise as the application does not satisfy the requirements established by the Environmental Impact Assessment framework and the National Planning Framework 4, since protected species have not been properly identified or assessed. The uncertainty introduced prevents the exclusion of adverse effects beyond a reasonable scientific doubt, activating the precautionary principle. Therefore, consent for the proposed application cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions results in an unreliable assessment. These critical deficiencies obstruct 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 ornithological assessment associated with the application exhibits significant deficiencies, marked by notable gaps in evidence and contradictions that diminish its credibility. It is essential to recognise that the west coast of the Isle of Lewis is home to seabird populations of international importance, many of which are already experiencing decline. However, the application fails to adequately demonstrate, to the necessary evidential standard, that these species will not face adverse impacts. The development's location within critical foraging areas and migratory pathways further exacerbates the issue, as the assessment does not thoroughly analyse potential displacement, collision risks, or habitat loss.

A critical inconsistency within the application arises from the developer's assertion that there will be no significant adverse effects, coupled with the pursuit of a Habitats Regulations derogation case. Such a case is only necessitated when significant harm is anticipated. This contradiction raises serious questions regarding the assessment's reliability, suggesting that the conclusions drawn are unsupported by the foundational evidence.

Furthermore, the assessment lacks sufficient evidence to ensure that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not comprehensively acknowledged, and the reliance on modelling techniques brings uncertainty, particularly concerning species in steep decline, like Kittiwakes and Fulmars. The methodologies employed are likely to underreport mortality rates, particularly in the absence of complete baseline data and a full understanding of behavioural responses.

Additionally, the placement of turbines within a recognised migratory corridor poses substantial risks, essentially creating an obstruction in a primary flight path used by species migrating between the United Kingdom and Iceland. The application inadequately assesses the long-term consequences of ongoing mortality within this corridor or the potential ramifications for species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential requirements necessary to determine that there will be no adverse effect on the

integrity of protected sites. The presence of contradictory conclusions, alongside data inadequacies and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle, thus precluding a lawful conclusion in support of consent.

Moreover, the identified deficiencies signify a failure to comply with National Planning Framework 4 concerning biodiversity protection and the conservation of natural assets. The inability to demonstrate that internationally significant seabird populations will remain unharmed places the proposal in direct opposition to national policy.

In summary, the assessment's reliability is undermined by internal inconsistencies, methodological flaws, and insufficient evidence. These shortcomings inhibit a comprehensive evaluation of the impacts and collectively indicate that the application does not fulfil the statutory requirements necessary for a valid determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of community identity and cultural heritage is insufficient. It does not recognise the West Lewis coastline as a living cultural landscape where environment, language, tradition, and community are deeply interconnected. Instead, the application treats heritage as isolated, static assets, neglecting their ongoing social, cultural, and spiritual importance within the community.

A significant issue is the treatment of culturally important sites like the cemeteries at Dalmore, Bragar, and Barvas. These sites are active burial and spiritual locations. However, they are classified as static features in the assessment, ignoring their ongoing use and significance, as well as how development may affect their surroundings. This mischaracterisation leads to an incomplete evaluation of cultural effects and overlooks their integral role in community life.

Moreover, the assessment fails to consider intangible cultural heritage, such as the Gaelic language and traditions, along with the longstanding connection between the community and the coastal environment. These aspects are vital to the identity of the area, yet they are not included in the assessment, creating a significant gap. Without acknowledging these factors, the true cultural impact of the development remains unclear.

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

A major procedural flaw is the absence of a compliant Island Communities Impact Assessment, a legal requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot meet its legal obligation to evaluate social, cultural, and economic impacts on the island community. This omission prevents a lawful determination.

From a policy standpoint, these shortcomings put the proposal at odds with National Planning Framework 4, particularly regarding the protection of historic assets and places. The neglect of both tangible and intangible heritage and the failure to acknowledge living cultural practices clearly deviate from policy requirements.

Overall, the lack of assessment of living heritage, intangible cultural value, community rights, and statutory obligations results in a substantial evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application fails to provide a sufficient basis for understanding the true cultural cost of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment related to seascape, landscape, and visual impacts is insufficient and does not capture the true scale of change or the vulnerability of the environment. The West Lewis coastline is characterised by an open Atlantic horizon, an undeveloped nature, and a profound sense of remoteness. The proposed introduction of large-scale turbines near the shoreline would create a persistent industrial presence that fundamentally alters this character, leading to a permanent and irreversible transformation of the landscape.

Furthermore, the application inadequately conveys the extent of this visual alteration. The size and proximity of the turbines would overshadow views from residential areas, historic sites, and popular coastal spots. This would negatively affect visual amenity and detract from the essential qualities of naturalness and remoteness. The assessment does not accurately depict this level of impact or its significance within such a delicate landscape.

Concerns also arise regarding the methodology used in selecting and presenting visual viewpoints. There is evidence that these viewpoints do not fully capture the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This creates a risk that the visual impact's magnitude has been downplayed, compromising the assessment's reliability.

Another shortcoming is the lack of consideration for the interconnected relationship

between landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape setting linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as separate entities, failing to acknowledge their interdependence and resulting in an incomplete analysis of the impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these relationships, affecting the context in which heritage assets are experienced and severing their connection to the natural horizon. This constitutes not just a visual impact but also a wider 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 regarding the protection of natural places and historic assets. The scale of change is at odds with the need to maintain landscape character, visual amenity, and the setting of culturally significant sites. The lack of a robust worst-case assessment further diminishes any assertions of policy compliance.

It is evident that the impacts identified cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelming and unavoidable. Consequently, the resulting change is fundamentally permanent, incapable of being reduced to an acceptable level through mitigation.

In conclusion, the assessment fails to accurately reflect the impact scale, the environment's sensitivity, and the interconnected nature of landscape and heritage. These deficiencies 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 lacks sufficient detail regarding construction and pollution risks, leaving the assessment incomplete and unable to adequately evaluate the likely environmental effects. It involves significant seabed preparation and installation works in a high-energy Atlantic environment, yet it does not present 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 has been granted, which hampers any meaningful assessment of their effectiveness or adequacy.

This dependence on unspecified 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 crucial habitats that are at risk from sediment disturbance

and contamination. Although the application acknowledges risks such as sediment mobilisation and potential accidental chemical or oil spills, it falls short of providing enough detail on how these incidents will be prevented, controlled, or monitored.

Uncertainty also surrounds the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust 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 that have already been recognised as sensitive within the wider assessment.

Moreover, the absence of comprehensive emergency response procedures exacerbates these issues. By postponing contingency planning until after consent is granted, the application restricts the ability to evaluate whether sufficient safeguards are in place to address pollution incidents. This introduces procedural risks and undermines the capacity of the competent authority to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral 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 the lack 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 failure to provide defined mitigation measures, the lack of detailed management plans, and the uncertainty regarding potential impacts collectively render the assessment deficient. These shortcomings obstruct a thorough evaluation of construction and pollution risks and further reinforce 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 an active fishing industry. However, the application fails to adequately evaluate the ecological and socio-economic impacts, raising significant concerns regarding the protection and maintenance of these vital uses and habitats. The assessment lacks a comprehensive analysis of how these activities can coexist without substantial disruption.

A critical concern is the assumption that fishing activities can be displaced without adverse consequences. The application does not provide evidence that alternative

fishing grounds are available or suitable for supporting the additional pressure that displacement would create. This lack of evidence is troubling, as it could lead to overfishing in other areas, resulting in wider economic repercussions for the local fishing fleet. Consequently, the impacts on fisheries and livelihoods remain poorly understood due to the absence of a clear, evidence-based assessment.

Furthermore, the proposal poses considerable risks to marine species, particularly due to underwater noise generated during construction activities. The use of high-energy hammer piling over an extended period is anticipated to cause disturbances across considerable distances, which may affect species such as dolphins. The predicted disturbance to a significant proportion of the local bottlenose dolphin population is a serious concern, yet the application inadequately addresses these impacts, lacking sufficient supporting evidence.

The assessment reveals a contradiction in acknowledging the necessity for licences to permit harm to European Protected Species while simultaneously characterising the impacts as negligible. This inconsistency undermines the credibility of the assessment and raises questions regarding compliance with the Habitats Regulations, particularly when harm is expected to a degree that necessitates legal authorisation.

Moreover, the assessment does not adequately consider cumulative impacts arising from multiple factors, including habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough 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 compliance with the National Planning Framework 4 or the National Marine Plan. It fails to establish that the proposed development can coexist with current marine users or prevent unacceptable impacts on marine biodiversity, thus preventing a conclusion that the proposal embodies sustainable development.

In summary, the deficiencies in the evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal inconsistencies within the application collectively render the assessment incomplete and unreliable. These shortcomings hinder a thorough evaluation of the impacts on marine life and fisheries.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are a crucial aspect of the area's environmental quality, cultural identity, and tourism potential. The proposal introduces 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 change would fundamentally alter the night-time environment and represents a significant concern.

Furthermore, the application does not address how this lighting would impact visual amenity, landscape character, or the experiences of residents and visitors. Given the importance of dark skies to the local identity and to emerging sectors like astro-tourism, this oversight is considerable and creates a notable gap in the overall landscape and environmental assessment.

More importantly, there is no evaluation of the potential impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to phototaxis, which can result in disorientation and increased collision risks. The lack of a lighting impact assessment or phototaxis study means the application fails to consider how aviation lighting might affect these species or contribute to increased mortality rates.

This gap is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which overlooks nocturnal activities and associated risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting; however, this vulnerability has not been examined. Without site-specific night-time data, there exists a significant deficiency in understanding the ecological impacts of the proposal.

The absence of an assessment regarding nocturnal impacts prevents the determination of whether protected species or designated sites could face adverse effects. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt cannot be satisfied, thus invoking the precautionary principle and obstructing a lawful determination.

From a policy standpoint, this omission is in conflict with the National Planning Framework 4 regarding the protection of natural places and environmental quality. It also diminishes the comprehensive assessment of landscape and seascape impacts since the night-time character is a vital element of the environment.

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

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal presents significant shortcomings in its adherence to the principles of sustainable development, particularly when evaluated against statutory obligations, national policy, and evidential benchmarks. This application echoes the fundamental issues that led to the rejection of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the scale of industrialisation. Despite being submitted under a more robust policy framework that prioritises biodiversity, peatland conservation, landscape integrity, and community wellbeing, it still fails to meet essential requirements.

Crucial gaps in baseline data are evident, along with an undefined design envelope, and there is an overreliance on unspecified mitigation measures. Additionally, key impact pathways related to nocturnal wildlife, complete onshore infrastructure, and tourism effects have been overlooked. The Environmental Impact Assessment is therefore inadequate, failing to provide a comprehensive understanding of the likely significant effects or any residual impacts.

Moreover, procedural deficiencies are apparent. The lack of a compliant Island Communities Impact Assessment breaches the statutory duty outlined in the Islands (Scotland) Act 2018, and the failure to present a 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.

The proposal stands in direct opposition to National Planning Framework 4, as it does not demonstrate adequate protection for biodiversity, natural environments, or cultural heritage. It also fails to ensure 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 impacts of offshore and onshore components have not been thoroughly evaluated, leaving potential effects on peatlands, carbon balance, habitats, and crofting land obscured.

Environmental risks remain ambiguous and may be substantial. Assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent within their findings. The evidential requirement to rule out adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and preventing a lawful conclusion about the acceptability of impacts.

The proposal threatens to bring about profound and irreversible changes to a sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual connections, and adverse effects on tourism represent

enduring impacts that cannot be adequately mitigated.

In summary, the application is both procedurally and substantively inadequate for determination. The multitude of information deficiencies, coupled with policy conflicts and unresolved environmental uncertainties, obstructs a lawful and evidence-based decision. The competent authority must either reject this application outright or invoke regulatory provisions to demand the submission of the missing information.

Consequently, it is formally requested that the application for the Spiorad na Mara Offshore Wind Farm is entirely refused.

Member of Public 235

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.

MARINE ECOLOGY AND PROTECTED SPECIES

The application does not comply with the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to adequately identify or assess protected species. This deficiency introduces a level of uncertainty that prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. In light of these circumstances, consent cannot be lawfully granted.

The assessment of marine ecology and protected species is significantly flawed and fails to provide a comprehensive understanding of the ecological receptors in the West Lewis coastal environment, which is a biologically active and sensitive marine system. The methodologies employed are insufficient, resulting in incomplete baseline data that does not reliably capture the presence, behaviour, and habitat use of various species. Consequently, the evidential basis for evaluating potential impacts is weak.

A significant oversight pertains to otters, classified as a European Protected Species, with the application not adequately recognising their active utilisation of coastal areas for foraging and movement. The neglect of their core foraging range and behavioural patterns results in an insufficient assessment of the potential impacts of construction disturbance, noise, and increased activity, undermining any conclusions regarding the absence of significant effects on this species.

Moreover, there are notable shortcomings in the assessment of basking sharks, particularly due to the reliance on aerial surveys, which introduce considerable detection bias, especially under Atlantic conditions. This methodology is likely to lead to an underestimation of the sharks' presence, particularly when compared to established land-based observations that indicate frequent utilisation of these waters. The failure to properly consider such data contributes to an incomplete baseline, further diminishing the reliability of the presented conclusions.

These methodological shortcomings imply that conclusions of negligible or non-significant effects are derived from assumptions rather than sound evidence. The lack of adequate baseline data also inhibits a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions, creating ambiguity about the actual level of risk posed to marine species and habitats.

In summary, the combined issues of incomplete baseline data, inadequate methodologies, and unfounded conclusions result in an unreliable assessment. These

shortcomings hinder a thorough evaluation of the impacts on marine ecology and protected species, ultimately demonstrating that the application lacks a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application proposes the development of turbines situated within a key migratory corridor on the west coast of the Isle of Lewis, an area that is home to internationally significant seabird populations, many of which are already experiencing decline. However, the ornithological assessment associated with this application is fundamentally flawed, containing significant gaps in evidence and internal inconsistencies that compromise its conclusions. The assessment fails to adequately demonstrate that these seabird species will not be adversely affected, particularly regarding important foraging areas and migratory pathways. It does not sufficiently evaluate the risks associated with displacement, collision, or habitat loss.

A notable contradiction arises within the application, as the developer asserts that there will be no significant adverse effects while simultaneously pursuing 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, suggesting that the conclusions drawn are not supported by the underlying evidence. Additionally, the assessment lacks adequate evidence to confirm that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The crucial significance of these feeding grounds is not fully acknowledged, and the reliance on modelling methods creates uncertainty, particularly for species facing severe decline, such as Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality rates, especially given the incomplete baseline data and insufficient understanding of behavioural responses.

Moreover, the positioning of turbines within a recognised migratory corridor introduces an additional and substantial risk, effectively acting as a barrier within a primary flight path for species migrating between the United Kingdom and Iceland. The application fails to thoroughly assess the long-term implications of ongoing mortality within this corridor or the potential impact on species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential standard required to ascertain no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, alongside data deficiencies and modelling constraints, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation engages the precautionary principle and prevents a lawful conclusion in favour of consent.

The identified deficiencies further reflect non-compliance with National Planning Framework 4 regarding biodiversity protection and the preservation 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 lack of sufficient evidence. These shortcomings inhibit a thorough evaluation of potential impacts and contribute to the conclusion that the application fails to meet the statutory requirements necessary for a favourable determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is characterised as a living cultural landscape, where the interplay of environment, language, tradition, and community is vital. However, the assessment of cultural heritage and community identity associated with this area is insufficient, as it treats heritage merely as a collection of isolated and static assets. This approach neglects the dynamic social, cultural, and spiritual roles that these elements play within the community.

Cemeteries located at Dalmore, Bragar, and Barvas are of particular significance, as they are active sites of burial and spiritual practice. The assessment, however, categorises these sites as static features and fails to account for their ongoing use and meaning, alongside the implications of development on their surrounding environments. This mischaracterisation leads to an incomplete understanding of cultural effects and overlooks the cemeteries' importance to community life.

Moreover, the evaluation does not address intangible cultural heritage, which includes the Gaelic language, traditions, and the long-established relationship between the community and the coastal environment. Such elements are crucial to the area's identity, yet they are completely overlooked, resulting in a substantial omission that hinders a comprehensive understanding of the development's cultural impact.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity and is recognised as Indigenous People. Nonetheless, the process of Free, Prior and Informed Consent has not been implemented, which diminishes the legitimacy of the assessment and fails to adhere to established participatory principles for decisions affecting cultural and environmental matters.

A significant procedural shortcoming is evident in the lack of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The absence of this assessment restricts the competent authority's ability to meet its legal obligations regarding the evaluation of social, cultural, and economic

impacts on the island community, thereby preventing lawful determination of the proposal.

From a policy standpoint, these oversights place the proposal in direct contradiction with 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, constitutes a clear deviation from requisite policy standards.

Overall, the combined failure to adequately assess living heritage, intangible cultural value, community rights, and statutory obligations results in a substantial evidential gap. The cultural impacts of the development remain unexamined, and the application fails to offer a solid foundation for assessing the true cultural costs associated with the proposal.

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 assessment of visual and seascape impacts surrounding the proposal is fundamentally inadequate and does not properly account for the scale of change or the sensitivity of the environment in question. The West Lewis coastline is characterised by its unspoiled Atlantic horizon, a largely undeveloped nature, and a profound sense of remoteness. Should large-scale turbines be introduced near the shoreline, their presence would create an overwhelming industrial landscape, irrevocably changing the character of the area and leading to a permanent transformation of the landscape.

Moreover, the application fails to accurately depict the extent of the visual alterations anticipated. The size and proximity of the turbines would dominate vistas from residential locales, historic sites, and popular coastal areas, directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment does not adequately convey the significance of these impacts within the context of such a sensitive environment.

Concerns also arise regarding the methodology used in selecting and presenting visual viewpoints. Evidence suggests that certain viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning significant cultural heritage sites and landscapes of high value. This risk implies that the visual impact may have been understated, casting doubt on the reliability of the assessment.

Another notable shortcoming is the lack of an evaluation of the interconnected nature of landscape, seascape, and cultural heritage. Key sites, including the Calanais Standing Stones and other Scheduled Monuments, are intrinsically linked to their wider landscape through visual and spatial relationships with the Atlantic horizon. The assessment treats these heritage assets in isolation, failing to acknowledge their interdependence, which leads to an incomplete understanding of the impacts on their setting and cultural significance.

The potential industrialisation of the seascape would disrupt these connections, thereby altering how heritage assets are perceived and diminishing their ties to the natural horizon. This signifies not just a visual concern, but a broader cultural and spatial detriment that has not been sufficiently addressed in the application.

From a policy standpoint, the proposal contravenes National Planning Framework 4 regarding the protection of natural environments and historic assets. The anticipated changes contradict the imperative to preserve landscape character, visual amenity, and the contextual integrity of culturally significant sites. The failure to conduct a comprehensive worst-case assessment further undermines any assertion of policy compliance.

Additionally, it is evident that the identified impacts cannot be adequately mitigated. Given the scale, height, and proximity of the turbines, their presence would be both prominent and inescapable. The resulting transformation is consequently 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 magnitude of impact, the sensitivity of the environment, or the interconnectedness of landscape and heritage. These deficiencies hinder a reliable evaluation and reinforce the conclusion that the proposal is inconsistent with the safeguarding of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks a comprehensive assessment of construction and pollution risks, which is critical for understanding the likely environmental effects. It involves significant seabed preparation and installation activities in a high-energy Atlantic environment, but there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included. Instead, the application relies on mitigation and contingency measures that are to be prepared after consent is granted, hindering a meaningful evaluation of their adequacy and effectiveness.

This reliance on unspecified future measures raises serious concerns, especially considering the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and significant habitats that are at risk from sediment disturbance and contamination. While the application does acknowledge risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it fails to provide sufficient information on how these risks will be prevented, controlled, or monitored.

Moreover, there is uncertainty regarding the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. Without robust modelling and well-defined management strategies, the potential extent, duration, and ecological impacts of these plumes cannot be determined. This uncertainty also extends to the effects on marine species and habitats, which have already been identified as sensitive in the wider assessment.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent, the application fails to allow for an evaluation of whether adequate safeguards are in place to address potential pollution incidents. This introduces procedural risks and undermines the competent authority's ability to assess the necessary environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards goes against the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be assessed before consent can be granted. The absence of this critical information means that a lawful determination cannot be reached. 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 create a materially deficient assessment. These deficiencies impede 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 serious shortfall in assessing the impacts on fisheries and marine life, resulting in an incomplete understanding of the ecological and socio-economic consequences. The coastal waters off West Lewis are home to a vibrant marine ecosystem and an active fishing industry. However, the proposal fails to provide assurance that these essential uses and habitats will be protected from significant

disruption.

One critical concern is the flawed assumption that fishing activities can simply be displaced without negative repercussions. The application does not offer any evidence regarding the availability or accessibility of alternative fishing grounds capable of accommodating increased pressure. This lack of information is crucial, as displacing fishing efforts could lead to overfishing in other areas, ultimately affecting the local fleet's economic viability. Without a thorough, evidence-based assessment, the implications for fisheries and local livelihoods remain unclear.

Additionally, the proposal poses considerable risks to marine species, especially due to the underwater noise generated by construction activities. Prolonged hammer piling is anticipated to disturb marine life over extensive distances, impacting species such as dolphins. The projected disturbance to a significant segment of the local bottlenose dolphin population raises alarming issues, yet the application minimises these effects without adequate supporting evidence.

There exists a notable inconsistency within the application, as it acknowledges the necessity for licences to permit harm to European Protected Species, while simultaneously claiming that impacts are negligible. This contradiction diminishes the credibility of the assessment and raises questions about compliance with the Habitats Regulations, particularly when harm is expected to an extent that requires legal authorisation.

Furthermore, the assessment neglects to consider the cumulative impacts from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a comprehensive analysis 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 fails to demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not show that the development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, hindering any assertion that the proposal constitutes sustainable development.

In summary, the deficiencies related to fishing displacement, underestimation of acoustic impacts, and internal contradictions render the assessment incomplete and untrustworthy. These shortcomings obstruct a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal's separation of offshore turbines and onshore works results in a materially incomplete assessment, failing to fully account for the integrated nature of the project. This fragmented approach obscures the true scale of the environmental and socio-economic impacts, as the onshore elements, which include cabling across protected moorland and the construction of a substation near Stornoway, are not adequately assessed alongside their offshore counterparts.

Significant concerns arise from the construction activities, particularly the excavation across areas of deep peat within Barvas Moor. This region is a crucial carbon store and ecologically sensitive habitat, yet the application lacks a comprehensive evaluation of these impacts. Consequently, it prevents an accurate understanding of the project's overall environmental footprint.

By deferring the assessment of onshore impacts, the application fails to allow for a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered together, and the current separation hampers a complete understanding of the combined impacts on peatlands, habitats, and local communities.

Sensitive habitats, including machair systems and peatland environments, face significant risks that are not fully addressed. The application does not adequately demonstrate that impacts on these protected areas have been assessed or that suitable avoidance measures have been implemented, which highlights a clear evidential gap regarding biodiversity protection.

Furthermore, the disturbance of peatland raises serious concerns about the carbon balance. Disturbing these areas releases stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy development. The application provides insufficient detail on this matter or assurance that the overall carbon balance remains favourable.

The routing of infrastructure through active croft land presents additional challenges, introducing potential conflicts with existing land use and legal rights. There is no evidence provided that the necessary consents or processes have been initiated, thereby raising questions about the deliverability and lawful implementation of the project.

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 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 division of project components, the lack of a comprehensive assessment, and insufficient evidence regarding environmental and land use impacts culminate in an incomplete and unreliable application, hindering lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The omission of an assessment regarding dark skies and nocturnal wildlife represents a significant flaw within the Environmental Impact Assessment. The coastline of West Lewis is noted for its exceptionally dark skies, which contribute to the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting, which would be visible over considerable distances, is likely to create a continuous and intrusive "wall of light" effect on the western horizon, fundamentally altering the night-time environment.

The impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors has not been considered in the application. This lack of assessment is particularly troubling given the vital role that dark skies play in the area's identity and the emerging sector of astro-tourism. As a result, there is a significant gap in the overall evaluation of landscape and environmental factors.

Furthermore, there is no evaluation of how the proposed lighting may affect nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel exhibit sensitivity to artificial lighting, which can result in disorientation and heightened collision risks. The absence of a lighting impact assessment or a study on phototaxis means that the potential effects of aviation lighting on these species, and consequently their mortality rates, have not been addressed.

This issue is compounded by the reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal activities and their associated risks. Other species, including Kittiwakes, which may forage or migrate during the night, are also at risk of disorientation due to artificial lighting, yet this risk has not been evaluated. The lack of site-specific data collected during night-time creates a critical gap in understanding the ecological impacts.

Without a thorough examination of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites could be adversely affected. The evidential standard required to exclude any adverse effects beyond reasonable scientific doubt cannot be fulfilled, invoking the precautionary principle and thereby preventing a lawful determination.

From a policy standpoint, these omissions conflict with National Planning Framework 4

concerning the protection of natural spaces and environmental quality. They also weaken the comprehensive assessment of landscape and seascape impacts, as the night-time character is an integral aspect of the overall environment.

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

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm must be evaluated in light of its failure to meet the standards of sustainable development as dictated by statutory duties, national policy, and evidential requirements. It reflects the same core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, particularly concerning the unacceptable scale of industrialisation. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application remains deficient.

Critical gaps in baseline data are present, undermining the reliability of the evidential basis for determination. The proposal employs an undefined design envelope, relies on unspecified mitigation measures, and omits essential impact pathways, including those affecting nocturnal wildlife, onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment lacks completeness, inhibiting a comprehensive understanding of significant effects and residual impacts.

The procedural shortcomings are also significant. The absence of a compliant Island Communities Impact Assessment constitutes a breach of the Islands (Scotland) Act 2018. Moreover, the failure to provide a full 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 issues render the application unfit for determination.

Furthermore, the proposal conflicts with National Planning Framework 4, lacking adequate demonstration of biodiversity protection, natural area preservation, and cultural heritage safeguarding. It does not prove that health and wellbeing impacts are acceptable, nor does it present evidence of a net economic benefit, particularly due to the lack of tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore elements has been inadequately addressed, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainty surrounds environmental risks, which could be significant. The

assessments concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also inconsistent in parts. The necessary evidential threshold to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful determination that the impacts are acceptable.

Additionally, the proposal would inflict substantial and irreversible alterations to a sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption to cultural and visual relationships, and negative impacts on tourism will result in permanent changes that cannot be sufficiently mitigated.

In summation, the application is procedurally and substantively unfit for determination. The extent of information deficiencies, alongside conflicts with policy 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 mandate the submission of the requisite missing information.

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

Additional Comments

The already fragile ecological environment here in the Isle of Lewis will be irrevocably damaged by this project.

There are numerous nesting protected Sea Eagles often seen hunting and feeding on the Machair very close to the proposed site of the substation in Barvas. Their habitat would be decimated by the actual construction and in future by the the subsequent noise and traffic pollution at the site.

Not the mention the harm which will be done to marine mammals that are frequently seen off the coast where the turbines themselves are proposed to the sited.

Member of Public 236

Objection To Spiorad na Mara Offshore Wind Farm

References: MD-00011742 & MD-00011743

Dear Sir/Madam

This letter presents 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 regimes. A thorough examination of the Environmental Impact Assessment Report and the accompanying documentation reveals significant deficiencies across multiple areas, including planning, environmental factors, cultural considerations, and procedural compliance. 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 rich cultural identity. Concerns arise regarding the compatibility of the scale, proximity, and design of the proposal with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential foundation necessary for a lawful determination. There is a notable absence of critical environmental data, the baseline information presented is limited and inconsistent, and essential components of the proposal remain unspecified. The flexible design framework employed hampers a clear understanding of the potential significant effects, while the dependence on unspecified mitigation measures renders any assessment of their effectiveness impossible. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, thereby undermining claims of negligible or non-significant effects due to the lack of robust evidence.

Substantive conflicts with existing policy frameworks are evident. The proposal appears to be at odds with 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 safeguarding biodiversity, addressing climate interests, and maintaining environmental integrity. Such conflicts directly impact the statutory tests necessary for consent and weaken the competent authority's ability to determine the development's policy acceptability.

The proposal's scale is unprecedented for this location, featuring large turbines placed in close proximity to the shoreline, which raises significant issues regarding landscape capacity, visual dominance, and overall environmental impact. Collectively, the deficiencies in information, reliance on undefined mitigation measures, evidential

weaknesses, and clear policy non-compliance indicate that the application is incomplete and inadequate to support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is deficient and fails to deliver a comprehensive, transparent, or dependable account of the potential environmental effects of the proposal. The introduction of a flexible Project Design Envelope, which lacks commitments to specific turbine dimensions, layouts, or configurations, generates substantial uncertainty and hinders the consistent application of a worst-case scenario. This issue undermines the integrity of the assessment and obscures the true extent of environmental effects from both the public and the competent authority.

The application is heavily reliant on mitigation measures, monitoring strategies, and management plans that have not been adequately defined. As such, consent is being sought with the expectation that any environmental harm will be addressed at a later stage. This approach obstructs meaningful evaluations of effectiveness and an assessment of residual impacts. The deferral of essential information to post-consent phases is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which necessitates that significant effects and mitigation are clearly identified prior to determination.

Significant evidential deficiencies are also present, including gaps in baseline data, methodological limitations, and a reliance on assumptions instead of site-specific evidence. This results in uncertainties about the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are drawn without adequate supporting data. The lack of sufficient information impedes a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that cannot align with statutory requirements.

Consequently, the application does not meet the evidential threshold stipulated under 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 fails to demonstrate compliance with National Planning Framework 4, especially regarding biodiversity protection and environmental integrity, as it cannot be established that impacts have been thoroughly 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 robust assessment of environmental effects and place the competent authority in a position where it cannot determine the application based on the information that has been provided.

ASSESSMENT OF ALTERNATIVES

The application fails to provide a structured and reasoned comparison of realistic alternatives, which is essential under the Environmental Impact Assessment regime. Instead of a thorough analysis of environmental effects, it offers a narrative of project evolution. This approach does not adequately show that less harmful options have been properly identified, assessed, and selected in favour of more damaging solutions.

Moreover, there is a lack of transparent, evidence-based comparisons of alternative offshore locations, development scales, or design configurations. Notably, the application does not prove that the developer has genuinely considered placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be lessened. The sensitivity of the West Lewis coastline, coupled with the crucial role of proximity to shore in assessing impact, highlights the significance of this omission. Without such analysis, it cannot be concluded that the proposed siting represents the least damaging option.

This inadequacy extends to the assessment of cable routing and landfall, with insufficient evidence that alternative routes have been thoroughly examined to mitigate impacts on sensitive receptors, including areas of cultural and spiritual significance like Barvas Cemetery. The failure to provide a clear avoidance strategy and the lack of comparative analysis suggest that mitigation by design has not been implemented, relying instead on post-design measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through site selection, layout, and infrastructure routing. This represents a failure to adhere to the established mitigation hierarchy and hampers the competent authority's ability to determine if less harmful and more suitable alternatives exist. Without a comprehensive assessment of alternatives, it cannot be concluded that the proposal is a sustainable or policy-compliant option.

From a policy standpoint, these deficiencies undermine compliance with National Planning Framework 4, particularly in terms of safeguarding natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission that leads to the conclusion that the application has not been sufficiently evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed assessment of marine ecology and protected species for the West Lewis coastal environment is fundamentally inadequate, failing to provide a complete understanding of ecological receptors in this sensitive and biologically rich marine system. The methodologies employed are insufficient, leading to incomplete baseline data that do not reliably capture species presence, behaviour, and habitat use. Consequently, there is no sound evidential basis for evaluating potential impacts.

The assessment notably overlooks otters, classified as a European Protected Species. The application does not adequately recognise or evaluate their active use of coastal areas for foraging and movement, failing to consider their core foraging range and behavioural patterns. This gap in understanding means that the potential effects of construction disturbance, noise, and increased activity on otters have not been properly assessed, undermining any conclusions regarding the absence of significant effects on this species.

Similar deficiencies are evident in the assessment of basking sharks, where reliance on aerial surveys introduces a significant detection bias, particularly in Atlantic conditions. This methodology is likely to underestimate the presence of basking sharks, especially when compared to land-based observations that indicate frequent use of these waters. The failure to incorporate or adequately consider such data results in an incomplete baseline, thus compromising the reliability of the conclusions drawn.

These methodological shortcomings render conclusions of negligible or non-significant effects based more on assumptions than on robust evidence. Furthermore, the absence of sufficient baseline data hampers a meaningful assessment of cumulative and indirect impacts, including seasonal variation and interactions within the broader ecosystem. This creates uncertainty about the true scale of risk 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 not properly identified or assessed protected species. The level of uncertainty introduced precludes the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these circumstances, consent cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions results in an unreliable assessment. These deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species and indicate that the application does not rest on a sufficient evidential foundation.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment regarding social impacts, health, and wellbeing associated with the proposal is significantly deficient and lacks the necessary transparency for a lawful evaluation. Although a Social Impact Assessment was commissioned by the developer, including focus groups with local residents, the complete report has not been made publicly available. This absence represents a substantial evidential gap that inhibits both public understanding and the competent authority's ability to ascertain the full range of social risks identified in the developer's research.

Residents have expressed measurable stress, anxiety, and concern stemming from the scale and proximity of the proposed development, as evidenced by direct engagement with the community. However, the lack of access to the full assessment hampers proper scrutiny of these findings, limiting the capacity to evaluate their significance in the decision-making process. Furthermore, the proposal is perceived as a threat to community identity and cohesion, with the developer's findings highlighting a potential "cultural loss." Notably, these impacts have not been adequately addressed within the main application, nor have they been assigned appropriate weight, thereby obscuring the genuine human and social costs associated with the development.

The absence of transparency fundamentally undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health implications is vital for developments of this magnitude, especially when community character and functionality may be jeopardised. By failing to provide the complete dataset, the application lacks a thorough evidential basis necessary for weighing the benefits against the potential harms.

From a policy standpoint, the application falls short of demonstrating adherence to the National Planning Framework 4 concerning health and wellbeing. Development must not only support positive health outcomes but also mitigate harm. The evidence currently available indicates existing adverse effects that have not been fully disclosed, rendering it impossible to demonstrate compliance with this policy without the full assessment.

The procedural ramifications of this situation are considerable. The competent authority is unable to conduct a robust socio-economic and health evaluation due to the unavailability of the full Social Impact Assessment. This represents a material omission within the application, failing to satisfy the evidential requirements set forth by the Environmental Impact Assessment regime.

In conclusion, the non-disclosure of the complete Social Impact Assessment, in

conjunction with the evidence of existing adverse impacts, leads to an incomplete and unreliable assessment. This deficiency obstructs a lawful determination and underscores the conclusion that the application lacks sufficient supporting information.

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 assessment regarding construction and pollution risks is fundamentally lacking, failing to provide the necessary detail to evaluate the potential environmental impacts adequately. The proposal entails significant seabed preparation and installation works within a high-energy Atlantic environment. However, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans available. Instead, the application depends on mitigation and contingency measures that would only be developed after consent, which precludes any thorough evaluation of their effectiveness or adequacy.

This dependence on unspecified future measures raises serious concerns, particularly given the sensitivity of the West Lewis coastline, which is home to clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it does not offer adequate detail on how these issues will be prevented, controlled, or monitored.

Additionally, there is ambiguity surrounding 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 repercussions of these impacts. This uncertainty also pertains to potential effects on marine species and habitats that have already been identified as sensitive within the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application inhibits the evaluation of whether suitable safeguards are in place to respond to pollution incidents.

This approach introduces procedural risks and diminishes the capability 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 set by the Environmental Impact Assessment regime. Significant likely effects and mitigations must be evaluated prior to consent, and in the absence of such information, a lawful determination cannot be achieved. Moreover, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

In summary, the lack of defined mitigation measures, absence of detailed management plans, and uncertainty regarding potential impacts collectively render the assessment materially deficient. These deficiencies impede a robust evaluation of construction and pollution risks and reinforce 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 an active fishing industry, both of which are vital to the local community. However, the application in question does not adequately assess the ecological or socio-economic impacts associated with its proposals. It is evident that the assessment of fisheries and marine life is insufficient, failing to provide a robust evaluation that would allow for an understanding of how these essential uses and habitats can be protected or maintained without significant disruption.

A major concern is the assumption that fishing activity can be displaced without any consequences. The application lacks evidence to support the claim that alternative fishing grounds are available, accessible, or capable of bearing the additional pressures that displacement would create. This critical omission poses a risk of overfishing in other areas, which could have far-reaching economic consequences for the local fleet. Consequently, without a clear and evidence-based assessment, it is impossible to fully grasp the impacts on fisheries and the livelihoods of those who depend on them.

Furthermore, the proposal raises considerable risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over an extended timeframe is anticipated to cause disturbances over large distances, impacting species such as dolphins. The potential disturbance to a significant proportion of the local bottlenose dolphin population is alarming, yet the application tends to downplay the significance of these effects, lacking sufficient supporting evidence to substantiate its claims.

In addition, there exists a glaring inconsistency within the application where the necessity for licences to permit harm to European Protected Species is acknowledged, even as the impacts are simultaneously described as negligible. This contradiction undermines the credibility of the entire assessment and raises serious concerns regarding compliance with the Habitats Regulations, especially when there is an expectation of harm requiring legal authorisation.

The assessment further fails to consider the cumulative impacts 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 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 does not sufficiently show that the development can coexist with existing marine users or that it can avoid unacceptable impacts on marine biodiversity, which precludes any conclusion that this proposal represents sustainable development.

In summary, the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the application render the assessment incomplete and unreliable. These deficiencies hinder any comprehensive 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.

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. This application reiterates the core issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. Now, it is presented under a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

The evidential basis for this application is incomplete and unreliable. There are significant gaps in the baseline data, and it continues to utilise an undefined design envelope. Moreover, it relies on unspecified mitigation measures and overlooks essential impact pathways, including those affecting nocturnal wildlife, the full extent of onshore infrastructure, and tourism. As such, the Environmental Impact Assessment is inadequate, failing to provide a comprehensive understanding of likely significant effects or residual impacts.

Procedural failures are also evident. The lack of a compliant Island Communities Impact Assessment violates statutory requirements under the Islands (Scotland) Act 2018, while the failure to disclose the complete Social Impact Assessment is 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 unfit for determination.

The proposal conflicts directly with National Planning Framework 4. It does not demonstrate adequate protection of biodiversity, natural places, and cultural heritage, fails to establish that health and wellbeing impacts are acceptable, and cannot substantiate a net economic benefit due to the absence of tourism impact modelling. Furthermore, the cumulative impacts of both offshore and onshore elements have not been thoroughly assessed, obscuring potential 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, at times, inconsistent. The evidential threshold necessary to eliminate adverse effects beyond reasonable scientific doubt has not been satisfied, thus engaging the precautionary principle and precluding any lawful conclusion regarding the acceptability of impacts.

Additionally, the proposal would cause 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 impacts on tourism represent permanent effects that cannot be adequately mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The significant information deficiencies, combined with policy conflicts and unresolved environmental risks, obstruct a lawful and evidence-based decision. The competent authority must refuse consent on these grounds or employ relevant regulatory provisions to compel 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.

Member of Public 237

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 review of the Environmental Impact Assessment Report and accompanying documents reveals significant deficiencies related to planning, environmental concerns, cultural impacts, and procedural integrity. The proposed site is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, relatively untouched environment, and deep cultural roots. The scale and design of this project raise serious questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application does not provide a sufficient evidential foundation for a lawful decision. There are critical gaps in environmental data, while baseline information is both limited and inconsistent, leaving essential components of the proposal inadequately defined. The flexible design framework employed hinders a clear assessment of potential significant effects, and the reliance on unspecified mitigation measures renders their effectiveness impossible to evaluate. Consequently, the provided documentation fails to deliver a comprehensive understanding of the environmental, cultural, or community implications, and claims regarding negligible or non-significant effects lack robust evidential support.

Substantial conflicts with policy are evident. The proposal 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. It does not demonstrate compliance with national mandates to safeguard biodiversity, climate concerns, and environmental integrity. These discrepancies directly relate to the statutory criteria necessary for consent and compromise the competent authority's ability to determine the development's policy acceptability.

The magnitude of this proposal is unprecedented for the area, with large turbines situated in close proximity to the shore, raising considerable concerns about landscape capacity, visual impact, and environmental repercussions. The combination of insufficient information, dependence on undefined mitigation, evidential shortcomings, and clear policy violations indicate that the application is incomplete and unable to

support a lawful determination. Under these circumstances, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies that undermine its reliability and transparency regarding the environmental effects of the proposal. Central to these issues is the reliance on a flexible Project Design Envelope, which lacks firm commitments to specific turbine dimensions, layouts, or configurations. This introduces substantial uncertainty and obstructs the consistent application of a worst-case scenario. Consequently, the impacts disclosed may not accurately represent the final development, thereby hindering both public understanding and the competent authority's ability to comprehend the true extent of environmental effects.

Moreover, the application is heavily contingent upon yet-to-be-defined mitigation measures, monitoring strategies, and management plans. This approach seeks consent on the premise that any environmental harm will be addressed post-consent, which compromises the opportunity for meaningful evaluation of effectiveness and an assessment of residual impacts. Such deferral of crucial information to stages following consent contradicts the Environmental Impact Assessment regime's intention, which mandates that significant effects and mitigation strategies are established clearly prior to determination.

Further exacerbating the situation are notable evidential deficiencies, including incomplete baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This results in uncertainty regarding the scale and significance of the impacts, especially where conclusions regarding negligible or non-significant effects are made without robust supporting evidence. The lack of sufficient information obstructs a comprehensive understanding of cumulative and worst-case impacts and introduces scientific uncertainty incompatible with statutory requirements.

As a result, the application does not meet the evidential threshold stipulated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This scenario activates the precautionary principle, particularly concerning protected species and sensitive habitats. The proposal also fails to adhere to the National Planning Framework 4, particularly in terms of biodiversity protection and environmental integrity, as it does not demonstrate that impacts have been fully assessed 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 renders the Environmental Impact Assessment Report both unreliable and incomplete. These inadequacies impede a lawful and robust assessment of environmental effects, leaving the competent authority unable to make a well-informed determination based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is lacking in depth and fails to deliver a thorough understanding of ecological receptors in the West Lewis coastal area. This marine environment is known to be sensitive and biologically rich. However, the baseline data is incomplete, and the methods used do not adequately document species presence, behaviour, and habitat usage. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

One significant gap pertains to otters, which are classified as a European Protected Species. The application does not sufficiently recognise or assess their use of coastal regions for foraging and movement. The oversight regarding their core foraging range and behavioural patterns leads to an inadequate evaluation of the impacts of construction disturbance, noise, and increased activity. This flaw undermines the findings regarding the absence of significant effects on this species.

There are also shortcomings in the assessment of basking sharks, as the reliance on aerial surveys introduces major detection bias, especially under Atlantic conditions. This method likely underrepresents their presence, in contrast to established land-based observations that show frequent usage of these waters. Not considering such data results in an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological flaws mean that any assertions of negligible or non-significant effects are grounded in assumptions rather than strong evidence. The lack of adequate baseline data also obstructs a meaningful evaluation of cumulative and indirect impacts, which include seasonal changes and broader ecosystem interactions. This raises uncertainty regarding the actual level of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set out by the Environmental Impact Assessment framework and National Planning Framework 4. Protected species have not been correctly identified or assessed. The uncertainty created prevents the dismissal of adverse effects beyond reasonable scientific doubt, which necessitates adherence to the precautionary principle. Thus, in these circumstances, consent cannot be granted legally.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions makes the assessment unreliable. These issues hinder a thorough evaluation of impacts on marine ecology and protected species, leading to the overall conclusion that the application lacks a strong evidential foundation.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is severely deficient, neglecting 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 perspective, treating heritage as isolated and unchanging assets, rather than acknowledging their continuing social, cultural, and spiritual relevance within the community.

Particularly concerning is the treatment of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites of burial and spiritual practice, yet the assessment mistakenly categorises them as static features, failing to take into account their ongoing use, significance, and the implications of development on their surroundings. This mischaracterisation leads to an inadequate evaluation of cultural effects and disregards the cemeteries' integral role in community life.

Moreover, the assessment lacks a consideration of intangible cultural heritage, which encompasses the Gaelic language, local traditions, and the longstanding relationship between the community and the coastal environment. These components are crucial to the area's identity but are entirely omitted from the evaluation, representing a significant oversight. The absence of these factors hinders a proper understanding of the cultural impact of the proposed development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population embodies a unique cultural identity with characteristics recognised as those of an Indigenous People. However, there has been no process of Free, Prior and Informed Consent undertaken. This lack of meaningful engagement undermines the credibility of the assessment and fails to comply with established principles regarding participation in decisions that affect cultural and environmental interests.

A fundamental procedural shortcoming is the lack of a compliant Island Communities Impact Assessment, which is mandated 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 is sufficient to preclude a lawful determination.

From a policy standpoint, these shortcomings place the proposal at odds with National Planning Framework 4, especially concerning the safeguarding of historic assets and locations. The failure to account for both tangible and intangible heritage, as well as to acknowledge living cultural practices, represents a clear deviation from policy expectations.

In summary, the neglect to assess living heritage, intangible cultural value, community rights, and statutory obligations culminates in a significant evidential void. The cultural impacts of the development have not been adequately evaluated, and the application lacks a robust foundation for ascertaining the true cultural costs associated with 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 assessment of visual impacts, seascape, and landscape is fundamentally flawed, failing to account for the scale of change and the sensitivity of the environment. The West Lewis coastline, characterised by its open Atlantic horizon, undeveloped nature, and profound sense of remoteness, would be irreversibly altered by the introduction of large-scale turbines near the shoreline. This would create a continuous industrial presence that drastically transforms the area's character.

Moreover, the application inadequately conveys the extent of the visual change. Given their size and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations, thereby negatively affecting visual amenity and compromising the essential qualities of naturalness and remoteness. The assessment does not sufficiently articulate the significance of these impacts within the context of such a sensitive landscape.

Concerns also arise regarding the methodology employed in selecting and presenting visual viewpoints. 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 high-value landscapes. This shortcoming raises the possibility that the visual impacts have been understated, compromising the reliability of the overall assessment.

Additionally, the failure to consider the interconnected relationship between landscape,

seascape, and cultural heritage represents a further deficiency. 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. By treating these assets as isolated, the assessment overlooks their interdependence, resulting in an incomplete understanding 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 impact is not limited to the visual realm; it encompasses broader cultural and spatial harm that has not been thoroughly examined in the application.

From a policy perspective, the proposal stands in direct conflict with National Planning Framework 4, particularly in terms of protecting natural places and historic assets. The scale of the proposed changes is incompatible with the imperative to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case assessment further diminishes any assertion of compliance with policy requirements.

Furthermore, 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 unavoidable. The resultant changes are thus fundamental and permanent, rather than reducible to an acceptable level through mitigation measures.

Collectively, these deficiencies illustrate that the assessment fails to accurately depict the scale of impact, the sensitivity of the environment, and the interrelatedness of landscape and heritage. Consequently, this undermines a reliable evaluation and reinforces the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal entails significant seabed preparation and installation works within a high-energy Atlantic environment. However, the assessment of construction and pollution risks is incomplete and lacks the necessary detail to evaluate 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 are to be defined post-consent, which obstructs any meaningful evaluation of their adequacy or effectiveness.

This reliance on undefined future measures raises considerable concerns due to the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are susceptible to sediment disturbance and

contamination. While the application recognises 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.

There exists uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and well-defined management strategies, it becomes impossible to ascertain the extent, duration, or ecological impacts of these disturbances. This uncertainty also applies to potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment.

Furthermore, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application undermines the ability to evaluate whether adequate safeguards are in place to address pollution incidents. This introduces procedural risk and compromises the capacity of the competent authority to assess environmental protection measures effectively at the determination stage.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. Significant effects and necessary mitigation measures must be assessed prior to granting consent; without this information, a lawful determination cannot be achieved. Additionally, the application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the absence of well-defined mitigation measures, inadequate management plans, and the uncertainty surrounding potential impacts render the assessment materially deficient. These deficiencies hinder a thorough evaluation of construction and pollution risks, further supporting the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast support a diverse marine ecosystem and an active fishing industry. However, the application presents an assessment of fisheries and marine life that is insufficient, failing to provide a robust evaluation of ecological or socio-economic impacts. A significant concern arises from the assumption that fishing activity can be displaced without consequence. The application lacks evidence that alternative fishing grounds are available, accessible, or capable of accommodating additional pressure. This omission is critical, as displacement could lead to overfishing in other areas and may result in wider economic repercussions for the local fleet. Consequently, without a clear and evidence-based assessment, the impacts on

fisheries and livelihoods remain inadequately understood.

Moreover, the proposal poses substantial risks to marine species, particularly due to the underwater noise generated during construction. High-energy hammer piling, expected to occur over an extended duration, is likely to disturb marine life across considerable distances, notably impacting species such as dolphins. The predicted disturbance to a significant portion of the local bottlenose dolphin population raises serious concerns; yet the application diminishes the significance of these effects, lacking sufficient supporting evidence.

Inconsistencies within the application further exacerbate the situation. While it acknowledges the need for licences to permit harm to European Protected Species, it simultaneously describes the anticipated impacts as negligible. This contradiction undermines the credibility of the assessment and raises questions regarding compliance with the Habitats Regulations, particularly when harm is expected to a degree that requires legal authorisation.

The assessment also neglects to address cumulative impacts resulting from multiple pressures, including habitat disturbance, noise, and the displacement of fishing activity. Absent 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 perspective, the application fails to demonstrate compliance with the National Planning Framework 4 or the National Marine Plan. It does not establish that the development can coexist with existing marine users or that it will avoid unacceptable impacts on marine biodiversity, thus obstructing any conclusion that the proposal represents sustainable development.

Ultimately, the inadequacy of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies collectively render the assessment incomplete and unreliable. These deficiencies hinder a robust evaluation of impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal includes onshore works such as cabling across protected moorland, the construction of a substation near Stornoway, and associated access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, a significant carbon store and ecologically sensitive habitat. However, the assessment of onshore infrastructure is materially incomplete and does not consider the full extent of impacts from what is a single integrated project.

The offshore turbines and onshore works are intrinsically linked yet have been assessed separately, resulting in a fragmented approach that obscures the true scale of environmental and socio-economic effects. By excluding or deferring the assessment of onshore impacts, the application prevents a proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates consideration of all components of a project together, but the separation of offshore and onshore elements leads to an incomplete understanding of the combined impacts on peatlands, habitats, and communities.

Significant risks to sensitive habitats exist, including machair systems and peatland environments that are protected by policy. The application fails to demonstrate that the impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been implemented, resulting in a clear evidential gap regarding biodiversity protection. Furthermore, there are concerns about the carbon balance, as the disturbance of peatland releases stored carbon, which could create a carbon debt and contradict the objectives of renewable energy development. The application does not adequately address this issue or prove that the overall carbon balance remains beneficial.

Additionally, routing infrastructure through active croft land presents 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 perspective, the failure to assess the project comprehensively and 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. The separation of project components, absence of thorough assessment, and lack of evidence regarding environmental and land use impacts render this part of the application incomplete and unreliable, hindering lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the standards required for sustainable development as set out in statutory duties, national policy, and evidential standards. It revisits the critical 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 more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application remains deficient.

There are significant shortcomings in the evidential foundation necessary for a thorough evaluation. The data provided is incomplete, with notable gaps, including reliance on an unspecified design envelope and unelaborated mitigation measures. Additionally, there is a lack of consideration for vital impact pathways, such as nocturnal wildlife, comprehensive onshore infrastructure, and the effects on tourism. Consequently, the Environmental Impact Assessment is inadequate and does not facilitate a full understanding of the likely significant effects or residual impacts.

Procedural issues are also evident, particularly the absence of a compliant Island Communities Impact Assessment, which breaches statutory obligations under the Islands (Scotland) Act 2018. Furthermore, the non-disclosure of the full Social Impact Assessment constitutes a material omission. These failures hinder the ability of the competent authority to assess implications for community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Moreover, the proposal contradicts the National Planning Framework 4, as it does not demonstrate adequate protection for biodiversity, natural sites, and cultural heritage. It fails to establish that health and wellbeing impacts are acceptable and lacks evidence of net economic benefit due to insufficient tourism impact modelling. The assessment of cumulative impacts from offshore and onshore activities has not been sufficiently conducted, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks posed by the proposal are uncertain and potentially significant. Evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in parts. The required evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful determination of acceptable impacts.

Additionally, the project is set to cause significant and irreversible changes to a highly sensitive landscape. The industrial development along the Atlantic-facing coastline, loss of dark skies, disruption to cultural and visual connections, and negative impacts on tourism will result in permanent effects that cannot be adequately mitigated.

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

Member of Public 238

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. This raises significant concerns regarding landscape capacity, visual dominance, and environmental impact.

A review of the Environmental Impact Assessment Report and supporting documentation reveals material planning, environmental, cultural, and procedural deficiencies. 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 use of a flexible design framework hinders a clear understanding of likely significant effects. Moreover, reliance on unspecified mitigation measures means their effectiveness cannot be assessed. Consequently, the documentation does not facilitate a full or informed understanding of environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust evidence.

There are clear and substantive policy conflicts present in the 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 compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. Such conflicts directly affect the statutory tests required for consent and undermine the ability of the competent authority to determine that the development aligns with policy requirements.

Overall, the absence of sufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and incapable of supporting a lawful determination. In these circumstances, the precautionary principle must apply.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application demonstrates significant evidential deficiencies, as it presents gaps in baseline data, limitations in methodology, and an over-reliance on assumptions instead

of site-specific evidence. This lack of robust supporting data leads to uncertainty concerning the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are drawn. Consequently, the absence of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that conflicts with statutory requirements.

Furthermore, the Environmental Impact Assessment Report is materially deficient, failing to deliver a full, transparent, or reliable account of the potential environmental effects of the proposal. The reliance on a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations, introduces significant uncertainty and hinders the consistent application of a worst-case scenario. This situation undermines the integrity of the assessment, obscuring the true extent of environmental effects from both the public and the competent authority.

The application also depends heavily on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent on the premise that environmental harm will be addressed at a later stage prevents any meaningful evaluation of effectiveness or the assessment of residual impacts. This postponement 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 established clearly prior to determination.

As a result of these deficiencies, the application fails to meet the evidential threshold set by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation activates the precautionary principle, particularly concerning protected species and sensitive habitats. Moreover, the proposal does not demonstrate compliance with National Planning Framework 4, including requirements related to biodiversity protection and environmental integrity, as it remains unproven that impacts have been fully assessed or that suitable safeguards are in place.

In conclusion, the combination of an undefined design envelope, the absence of specified mitigation, and gaps in baseline data culminates in an Environmental Impact Assessment Report that is both unreliable and incomplete. These flaws prevent a lawful and robust assessment of environmental effects, leaving the competent authority incapable of making an informed determination based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is fundamentally flawed and fails to deliver a complete understanding of the ecological receptors present. This region is recognised as a biologically active and

sensitive marine system, yet the baseline data provided is insufficient, and the methodologies employed do not adequately capture species presence, behaviours, and habitat usage. Consequently, the assessment lacks a robust evidential basis for assessing potential impacts.

The assessment's shortcomings are particularly evident regarding otters, a species protected under European law. The application does not appropriately recognise or evaluate their usage of coastal areas for foraging and movement. This oversight neglects to account for their core foraging ranges and behavioural patterns, resulting in a failure to adequately assess the impacts of construction disturbances, noise, and increased human activity. Such omissions undermine any claims concerning the absence of significant effects on otters.

Similarly, the assessment of basking sharks suffers from methodological deficiencies, primarily due to its reliance on aerial surveys that carry significant detection biases, especially under Atlantic conditions. This method is likely to underestimate their presence, particularly when compared to established land-based observations that indicate frequent usage of these waters. The disregard for such data further contributes to an incomplete baseline and diminishes the credibility of the conclusions drawn.

These methodological flaws imply that the assertions of negligible or non-significant effects are based more on assumptions than on solid evidence. The lack of comprehensive baseline data hinders any meaningful evaluation of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. This leaves uncertainties regarding the true extent of risks posed to marine species and habitats.

Regulatory requirements, including those set forth by the Environmental Impact Assessment regime and National Planning Framework 4, are not adequately met in the application, as it has not properly identified or assessed protected species. The uncertainties introduced necessitate the application of the precautionary principle, as it prevents the reasonable exclusion of adverse effects. Thus, consent cannot be lawfully granted under these circumstances.

In summary, the combination of incomplete baseline data, flawed methodologies, and unfounded conclusions culminates in an unreliable assessment. These critical deficiencies inhibit a thorough evaluation of the potential impacts on marine ecology and protected species and substantiate the overall assertion that the application lacks an adequate evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment presents several deficiencies that significantly undermine its conclusions. The assessment fails to convincingly demonstrate that internationally important seabird populations on the west coast of the Isle of Lewis, many of which are in decline, will not be adversely affected by the proposed development. This area includes key foraging zones and migratory pathways, yet the implications of potential displacement, collision risk, and habitat loss are not adequately evaluated.

There is a fundamental contradiction in the application, where the developer claims no significant adverse effects while also pursuing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises questions about the reliability of the assessment, suggesting that the conclusions drawn are not backed by sound evidence. Furthermore, the assessment does not provide adequate proof that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. It fails to account for the critical importance of these feeding grounds, and the use of modelling techniques introduces uncertainty, especially for species in severe decline like Kittiwakes and Fulmars. The methodologies applied may underestimate mortality rates, particularly where baseline data is lacking and behavioural responses are not fully understood.

The siting of turbines within a known migratory corridor introduces a significant risk, effectively acting as a barrier in a primary flight path used by birds travelling between the United Kingdom and Iceland. The application does not sufficiently assess the long-term implications of sustained mortality in this corridor or the potential impacts on species with small global populations.

Regulatory standards are not met, as the application fails to provide the necessary evidence 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 modelling, indicates that the standard of beyond reasonable scientific doubt has not been reached. This situation engages the precautionary principle and prevents a lawful conclusion that would support consent.

Collectively, these deficiencies signify a lack of 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 negatively impacted puts the proposal at odds with national policy. Overall, the assessment is unreliable due to internal inconsistencies, methodological flaws, and insufficient evidence, which hinder a thorough evaluation of the impacts and lead to the conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development undermines the recognition of the West Lewis coastline as a vibrant cultural landscape, where the environment, language, tradition, and community are deeply interconnected. The application adopts a narrow perspective, viewing heritage merely as static assets instead of acknowledging their dynamic social, cultural, and spiritual roles within the community.

A significant shortcoming of the proposal is its treatment of culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places for burial and spiritual practice, yet the assessment reduces them to static features, neglecting their ongoing use and significance, as well as the potential impacts of development on their surroundings. This mischaracterisation leads to an incomplete understanding of cultural effects and fails to appreciate their importance in community life.

The assessment also neglects to address intangible aspects of cultural heritage, such as the Gaelic language and the traditions linked to the coastal environment, which are vital to the area's identity. The absence of these elements from the evaluation is a serious oversight. Without considering these aspects, the true cultural implications of the development remain obscured.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity, recognised as Indigenous People, yet 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 matters impacting cultural and environmental interests.

A further critical failing is the lack of a compliant Island Communities Impact Assessment, required by the Islands (Scotland) Act 2018. This omission hinders the competent authority's ability to fulfil its legal obligations to assess the social, cultural, and economic effects on the island community, rendering any determination unlawful.

These deficiencies in the assessment place the proposal in direct conflict with the National Planning Framework 4, particularly concerning the protection of historic sites and cultural assets. The failure to account for both tangible and intangible heritage, along with the disregard for living cultural practices, demonstrates a clear deviation from policy standards.

Collectively, the neglect to assess living heritage, intangible cultural values, community rights, and statutory requirements creates a substantial evidential gap. The cultural

impacts of the development remain inadequately evaluated, and the application lacks a solid foundation for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the social impacts, health, and wellbeing assessment is deeply concerning and fundamentally undermines the evaluation process. Although a Social Impact Assessment was commissioned by the developer, which included engagement with local residents, the complete report has not been made available. This significant gap in evidence means that both the public and the competent authority are unable to grasp the full extent of the social risks that the developer's own research has identified.

Residents have reported experiencing significant stress, anxiety, and concern as a result of the scale and proximity of the proposal, and these impacts stem from direct engagement rather than speculation. The inability to access the full assessment limits the opportunity for proper scrutiny of these findings, impeding the ability to evaluate their significance in the decision-making process.

There is also a clear perception that the proposal threatens community identity and cohesion, with indications of potential "cultural loss" noted in the developer's findings. Despite this, these critical impacts have not been adequately integrated into the main application or weighted appropriately. The withholding of the full Social Impact Assessment obscures the real human and social costs associated with the development.

This lack of transparency significantly undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this nature, especially when community character and functioning are at stake. By failing to provide the complete dataset, the application does not offer a comprehensive evidential foundation needed to assess the balance between benefits and harm effectively.

From a policy perspective, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. It is essential for development to promote positive health outcomes and mitigate harm; however, the evidence available points to existing adverse effects that remain undisclosed. Without the full assessment, demonstrating compliance with this policy becomes impossible.

The procedural implications of this situation are profound. The competent authority is unable to perform a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a material omission within the

application and fails to meet the evidential standards required by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, alongside the evidence of existing adverse impacts, results in an incomplete and unreliable evaluation. This lack of sufficient information ultimately hinders a lawful determination regarding the application.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is insufficient and does not capture the sensitivity of the receiving environment. The West Lewis coastline is characterised by its open Atlantic horizon and undeveloped nature, contributing to a strong sense of remoteness. The proposed large-scale turbines situated near the shoreline would result in a continuous and dominant industrial presence, fundamentally changing this character and leading to a permanent transformation of the landscape.

The application does not adequately convey the extent of this visual change. Given the scale and closeness of the turbines, they would overshadow views from residential areas, historic sites, and popular coastal locations. This would diminish visual amenity and compromise the essential qualities of naturalness and remoteness. The assessment does not accurately reflect the level of impact or its importance in relation to such a sensitive landscape.

Concerns arise regarding the choice and presentation of visual viewpoints. There is evidence that these viewpoints may not fully 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 has been understated, which affects the assessment's reliability.

Additionally, there is a failure to consider the interconnectedness of landscape, seascape, and cultural heritage. Notable sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape interlinked visually and spatially with the Atlantic horizon. The assessment treats these sites as separate entities rather than recognising their interdependence, leading to an incomplete analysis of the impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these relationships, changing the context in which heritage assets are understood and their connection to the natural horizon. This constitutes not just a visual impact but also a broader cultural and spatial damage that has not been sufficiently examined in the application.

From a policy standpoint, the proposal is at odds with National Planning Framework 4, which emphasises the need to protect natural areas and historic assets. The degree of change proposed does not align with the requirement to preserve landscape character, visual amenity, and the setting of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertion of policy conformity.

It is evident that the impacts identified cannot be effectively mitigated. Due to the size, height, and proximity of the turbines, their presence would be overwhelming and inescapable. Consequently, the resultant change is not something that can be reduced to an acceptable level through mitigation.

Overall, 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 dependable evaluation and reinforce the view that the proposal conflicts with the preservation of this landscape.

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 waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry, yet the current application fails to adequately assess the ecological and socio-economic impacts associated with the proposed development. A significant concern is the assumption that fishing activities can be relocated without negative consequences. The lack of evidence supporting the availability of alternative fishing grounds that are both accessible and capable of handling increased pressure is troubling. This omission poses a risk of overfishing in other areas and may lead to broader economic repercussions for the local fishing fleet. Without a thorough and evidence-based analysis, the implications for fisheries and local livelihoods remain unclear.

Furthermore, the proposal poses substantial threats to marine species due to underwater noise during construction activities. The extended use of high-energy hammer piling is expected to create disturbances across considerable distances, impacting species such as dolphins. The anticipated disruption to a notable portion of the local bottlenose dolphin population raises critical issues, yet the application minimises these effects without providing adequate supporting evidence.

The application also contains inconsistencies, particularly regarding the need for licences to authorise harm to European Protected Species, while simultaneously declaring such impacts as negligible. This contradiction raises doubts about the credibility of the assessment and suggests potential non-compliance with the Habitats Regulations, especially when harm is expected to a level that necessitates legal

approval.

Moreover, the evaluation neglects to account for cumulative impacts resulting from various pressures, including habitat disruption, noise, and fishing displacement. The absence of a detailed examination of these interconnected effects hinders the ability to assess the overall consequences on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate alignment with National Planning Framework 4 or the National Marine Plan. It does not sufficiently illustrate how the development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, thereby challenging the conclusion that this proposal constitutes sustainable development.

In summary, the deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the assessment render it incomplete and untrustworthy. These shortcomings preclude a comprehensive evaluation of the potential impacts 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 is notably lacking in its evaluation of dark skies and nocturnal wildlife, which constitutes a significant oversight. The West Lewis coastline is known for its exceptionally dark skies, a crucial aspect of both environmental quality and cultural identity, as well as an important factor for tourism. The proposed installation of permanent red aviation lighting would create a continuous "wall of light" effect that could be seen from long distances, fundamentally changing the night-time landscape.

Furthermore, there is no consideration of how this lighting would impact visual amenity, landscape character, or the experiences of both residents and visitors. This omission is particularly concerning given the area's reliance on dark skies, which is vital for the growth of emerging tourism sectors, including astro-tourism. Consequently, this gap in the landscape and environmental assessment is glaring.

The application also fails to address the potential impacts on nocturnal wildlife, such as

the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, all of which are highly susceptible to artificial lighting. This susceptibility can lead to disorientation and an increased risk of collision. Without a lighting impact assessment or a study on phototaxis, the proposal does not adequately consider how aviation lighting could affect these species or lead to increased mortality rates.

Additionally, the reliance on daytime survey data in the ornithological assessment is troubling, as it does not take into account nocturnal activity or the associated risks. Other species, such as Kittiwakes, may forage or migrate at night, yet their vulnerability to artificial lighting has not been evaluated. The lack of site-specific data regarding night-time activity creates a vital gap in understanding the ecological impacts of the proposal.

Without a thorough assessment of nocturnal impacts, it remains unclear 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, which invokes the precautionary principle and calls into question the legality of the proposal.

From a policy standpoint, this lack of assessment contravenes National Planning Framework 4, which seeks to protect natural places and maintain environmental quality. It also diminishes the overall evaluation of landscape and seascape impacts, as the character of the night environment is a crucial component of the broader ecosystem.

In conclusion, the failure to assess dark skies and nocturnal wildlife represents a substantial evidential gap. The absence of baseline data, impact modelling, and specific analyses of affected species makes the application incomplete and unsuitable for lawful determination.

TOURISM

Tourism has become a cornerstone of the Isle of Lewis economy, growing significantly from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the local economy. However, the assessment of tourism impacts related to the proposed development is severely lacking. It fails to evaluate the economic and social consequences for this vital sector, which is fundamentally dependent on the area's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness. While the application acknowledges that 86% of visitors are attracted by scenery, it does not provide a quantified assessment of how large-scale offshore infrastructure would affect visitor numbers, behaviour, or the overall economic contribution.

The omission of a thorough analysis regarding the role of environmental quality in tourism is particularly alarming. Unspoiled landscapes and dark skies are crucial to visitor experience and the growth of emerging markets such as nature-based tourism and astro-tourism. The failure to include a Dark Skies Assessment further underscores this deficiency, leading to a significant gap in understanding the potential impacts on a recognised and growing part of the local economy.

In the context of an island community that has limited economic diversification, the neglect of tourism impact assessments carries broader implications for local employment, businesses, and community sustainability. The absence of 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 to show 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 adequately.

Overall, the failure to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and consider the island's economic dependency results in a significant evidential gap. This deficiency obstructs a robust evaluation of the economic effects, leading to the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the requirements of sustainable development as defined by statutory duties, national policy, and evidential standards. The issues highlighted in this application echo those from the 2008 refusal of the Lewis Wind Power proposal, where the scale of industrialisation was deemed unacceptable. Now, the proposal is presented against a stronger policy backdrop that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing.

A comprehensive and reliable evidential basis for the proposal is lacking. There are significant gaps in baseline data, it employs an undefined design envelope, and relies on unspecified mitigation measures. Furthermore, crucial impact pathways concerning nocturnal wildlife, full onshore infrastructure, and effects on tourism have been omitted. As a result, the Environmental Impact Assessment is incomplete, making it impossible to fully understand the likely significant effects or residual impacts.

Procedural shortcomings are also evident. The absence of a compliant Island Communities Impact Assessment breaches the statutory duties outlined in the Islands (Scotland) Act 2018. Additionally, the failure to provide a complete Social Impact Assessment is a material omission that hinders the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These deficiencies render the application unfit for determination.

The proposal conflicts directly with National Planning Framework 4. It does not adequately protect biodiversity, natural places, 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. There has also been insufficient assessment of the cumulative effects of offshore and onshore elements, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. The assessments conducted on marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in certain areas. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

Furthermore, the 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 would lead to permanent effects that cannot be adequately mitigated.

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

For these reasons, a formal request is made to refuse the application for the Spiorad na Mara Offshore Wind Farm in its entirety.

Additional Comments

I strongly object to this proposed development for a variety of reasons. From the outset, it became apparent that Northland had made little or no effort to garner public opinion and particularly from the population who would be most impacted by this. That is the people who live the nearest to it including myself. I would go as far as to say as the

community has been treated very disdainfully and with no respect. Many of the reasons for my objection are already included in this form regarding ecology, pollution and so forth. These islands are unique and need protection not exploitation. This is indeed exploitation of the worst kind, by a foreign company who did little more but offer crumbs from the table to the community originally whilst making billions of pounds for themselves. I strongly object on health grounds for the community , myself and my family. Evidence was put forward at a meeting some short time ago to support the claim that Health can be adversely affected by wind turbines. The positioning of these monstrously large turbines and the quantity of them so close by this community are highly likely to have considerable impact on Health, both physical and mental. Personally speaking as a sufferer from tinnitus ,hypersensitivity and PTSD. I know that the sound pollution, air disturbance etc will have a profound effect upon my health. I would go as far as to say my constitution would not be able to bear this. It would be unbearable. The community or communities of this island have not been supported by our council, we have not been supported by the government who are obviously hellbent upon a policy pursuing renewable energy often with near outdated technology like this for political reasons which they put above the needs of ordinary people. Put simply we have been badly let down by all of the agencies that should have been working for us. This is a dreadfully damaging pursuit which is leaving our community in particular the most traumatised. Young families with ancestors having lived here for many generations are now seriously considering relocating away from the island. So traumatised are they by this prospect, the disappointment and unhappiness they worry for the future health and well-being of their children. This is tragic and dreadfully damaging to the island as what is needed most here are young families and a vibrant population as opposed to a further drain and depopulation . In conclusion, we feel this is one of the worst disasters to befall these islands in the pursuit of money and increased political standing for the government. The bitterness, resentment, anger and disappointment is almost tangible and we are moved to tears !

Member of Public 239

Objection To Spiorad na Mara Offshore Wind Farm

References: MD-00011742 & MD-00011743

Dear Sir/Madam

This letter represents 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 development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise regarding the scale, proximity, and design of the proposal, as these factors call into question its compatibility with statutory requirements, national policy, and the principles of sustainable development.

A thorough review of the Environmental Impact Assessment Report and its supporting documentation reveals that the application does not provide an adequate evidential basis for lawful determination. Key environmental data is absent, baseline information appears limited and inconsistent, and several critical aspects of the proposal are not clearly defined. The use of a flexible design framework hampers understanding of likely significant effects, and reliance on unspecified mitigation measures raises concerns about their potential effectiveness. Consequently, the documentation fails to facilitate a complete or informed assessment of the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by robust evidence.

Furthermore, there are distinct and substantive conflicts with policy. The proposal is inconsistent with 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 inconsistencies directly challenge the statutory tests required for consent and weaken the competent authority's ability to ascertain the development's acceptability in policy terms.

The unprecedented scale of the proposal, involving large turbines situated in close proximity to the shoreline, raises significant concerns regarding landscape capacity, visual dominance, and environmental impact. Together, the lack of sufficient information, reliance on undefined mitigation strategies, evidential deficiencies, and clear policy non-compliance illustrate that the application is incomplete and unable to

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary comprehensiveness and transparency to accurately convey the potential environmental effects of the proposed development. The reliance on a flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations of turbines, creates substantial uncertainty. This uncertainty undermines the integrity of the assessment, as the impacts outlined may not correspond to the actual development constructed. Consequently, both the public and the competent authority are left without a clear understanding of the true extent of environmental effects.

Furthermore, the application is heavily dependent on mitigation measures, monitoring strategies, and management plans that are currently undefined. Seeking consent based on the promise of addressing environmental harm at a later stage hampers the ability to assess the effectiveness of these measures or evaluate residual impacts. This deferral of crucial information to post-consent stages is not only procedurally unacceptable but also contradicts the fundamental objectives of the Environmental Impact Assessment process, which mandates that significant effects and mitigations be clearly defined prior to determination.

There are substantial evidential shortcomings present, including gaps in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding both the scale and significance of impacts, especially where conclusions 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, introducing scientific uncertainties that cannot be reconciled with statutory requirements.

As a result, the application does not meet the evidential threshold necessary under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Moreover, the proposal does not demonstrate compliance with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it remains unproven that impacts have been fully assessed or that suitable safeguards exist.

In summary, the combination of an undefined design envelope, the absence of specific mitigation measures, and gaps in baseline data fundamentally undermines the reliability and completeness of the Environmental Impact Assessment Report. These

deficiencies obstruct a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make an informed decision based on the provided information.

ASSESSMENT OF ALTERNATIVES

The evaluation of alternatives within the application is significantly lacking and fails to comply with the statutory obligations of the Environmental Impact Assessment regime. Instead of offering a thorough and structured comparison of viable alternatives based on their environmental effects, the application merely recounts the project's development history. This narrative does not adequately illustrate that less harmful options have been appropriately identified, evaluated, and favoured over more detrimental choices.

There is a notable absence of a transparent, evidence-based comparison of various offshore sites, development scales, or design configurations. Specifically, the developer has not convincingly explored the possibility of situating turbines further offshore, which would likely mitigate visual, ecological, and coastal impacts. The West Lewis coastline's sensitivity and the crucial role of proximity to the shore in assessing impact render this omission particularly significant. Consequently, it is impossible to assert that the proposed location is indeed the least harmful option.

This lack of thorough assessment also extends to cable routing and landfall considerations, where there is insufficient evidence to suggest that alternative routes have been adequately investigated to avoid or lessen impacts on sensitive receptors, including culturally and spiritually significant sites like Barvas Cemetery. The failure to present a clear avoidance strategy and the absence of comparative analysis indicate that the approach taken lacks mitigation by design, relying instead on post-design measures.

Therefore, the application does not sufficiently show that environmental harm has been minimised through careful site selection, layout decisions, and infrastructure routing. This failure to adhere to the established mitigation hierarchy hampers the competent authority's ability to ascertain whether more appropriate and less harmful alternatives are available. Without a comprehensive assessment of alternatives, it cannot be concluded that the proposal aligns with sustainable practices or meets policy requirements.

From a policy standpoint, this inadequacy raises concerns about compliance with National Planning Framework 4, especially regarding the protection of natural environments, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment represents a significant gap that contributes to the overall

conclusion that the application has not undergone sufficient scrutiny 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 assessment of the application is deeply flawed, presenting significant gaps in evidence and internal inconsistencies that compromise its conclusions. Notably, 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 meet the necessary evidential standard to demonstrate that these species will not be adversely affected. Key foraging areas and migratory pathways are located near the development, yet the assessment does not adequately evaluate the potential implications of displacement, collision risk, or habitat loss.

There is a crucial contradiction within the application itself. While the developer asserts that there will be no significant adverse effects, they simultaneously put forward a Habitats Regulations derogation case, which is only warranted when significant harm is anticipated. This inconsistency raises serious doubts about the assessment's reliability and suggests that the conclusions drawn are not backed by sufficient evidence.

Moreover, the assessment does not convincingly demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is not thoroughly considered, and the reliance on modelling methods introduces uncertainty, particularly for species like Kittiwakes and Fulmars that are in severe decline. The methodologies used are likely to underestimate mortality rates, especially given that baseline data is lacking and behavioural responses are not fully understood.

The placement of turbines within a recognised migratory corridor adds another layer of significant risk, effectively posing a barrier to a primary flight path utilised 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 consider the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application fails to satisfy the evidential threshold necessary to conclude 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 achieved. This invokes the precautionary principle and prevents a lawful conclusion that supports consent.

The identified deficiencies also represent non-compliance 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.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage is fundamentally lacking, overlooking the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community intertwine. The application employs a narrow perspective, treating heritage merely as a collection of static features instead of recognising their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming is evident in the assessment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are active locations for burial and spiritual activities, yet they are regarded as unchanging elements, neglecting their continued significance and the implications of development on their surroundings. This misrepresentation leads to an inadequate understanding of cultural impacts and dismisses their importance in community life.

Moreover, the assessment disregards intangible cultural heritage, including the Gaelic language, local traditions, and the enduring connection between the community and the coastal environment. These aspects are vital to the area's identity but are conspicuously absent from the evaluation, representing a critical gap. Without acknowledging these factors, the true cultural implications of the proposed development remain obscured.

Concerns also arise regarding community engagement and rights. The Gaelic-speaking community has a distinct cultural identity, characterised as an Indigenous People, yet the necessary process of Free, Prior and Informed Consent has not been undertaken. This lack of genuine engagement compromises the credibility of the assessment and fails to align with established principles concerning participation in decisions that affect cultural and environmental matters.

Another major oversight is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. This evaluation is

essential for the competent authority to legally assess the social, cultural, and economic repercussions on the island community. Its absence alone prevents a lawful consideration of the proposal.

From a policy standpoint, these inadequacies place the development in direct opposition to the National Planning Framework 4, especially regarding the preservation of historic assets and sites. The failure to account for both tangible and intangible heritage, as well as to recognise active cultural practices, signifies a blatant disregard for policy stipulations.

Overall, the neglect to evaluate living heritage, intangible cultural values, community rights, and compliance with statutory obligations results in a substantial evidential void. The cultural repercussions of the development have not been adequately examined, leaving the application without a sufficient foundation for assessing the genuine cultural consequences of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer has commissioned a Social Impact Assessment that included focus groups with local residents. However, the full report has not been published, creating a significant evidential gap. This omission prevents both the public and the competent authority from comprehensively understanding the social risks identified through the developer's own research.

Available summaries suggest that residents are experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts have been derived from direct engagement with the community and are not merely speculative. Nevertheless, the lack of disclosure regarding the full assessment limits scrutiny of the findings and the ability to gauge their significance in the decision-making process.

There is also evidence indicating that the proposal poses a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite this, such impacts have not been fully integrated into the main application or adequately considered. The withholding of the complete Social Impact Assessment obscures the true human and social cost of the development.

This lack of transparency undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is vital for developments of this scale, especially when community character and functioning may be affected. The failure to provide the full dataset results in an incomplete evidential basis for assessing the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Development should promote positive health outcomes and prevent harm, yet the available evidence points to existing adverse effects that have not been fully disclosed. Without access to the complete assessment, compliance with this policy remains unproven.

The procedural implications are significant, as the competent authority cannot conduct a thorough socio-economic and health evaluation without the full Social Impact Assessment. This represents a material omission within the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, along with evidence of current adverse impacts, renders the assessment incomplete and unreliable. This situation hinders a lawful determination and reinforces the conclusion that the application lacks sufficient information to be supported.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon and an undeveloped character that conveys a strong sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the shoreline would create an overwhelming industrial presence, fundamentally changing this character and leading to a permanent and irreversible transformation of the landscape.

The application significantly underrepresents the magnitude of the visual change that would occur. Due to their scale and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and diminishing the naturalness and remoteness that define the area. The assessment does not adequately convey the level of impact or its significance, particularly given the sensitivity of the landscape.

Methodological issues have also been identified regarding the selection and presentation of visual viewpoints. Evidence indicates that some viewpoints may fail to adequately represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the concern that the visual impacts have been understated, which undermines the credibility of the assessment.

Moreover, the assessment neglects to consider the interconnected relationship between seascape, landscape, and cultural heritage. Significant sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader

landscape setting that is visually and spatially linked to the Atlantic horizon. The assessment treats these assets in isolation, rather than recognising their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would disrupt these connections, fundamentally altering the context in which heritage assets are experienced and severing their ties to the natural horizon. This presents not only a visual impact but also a broader cultural and spatial harm that has not been adequately addressed in the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4 regarding the protection of natural places and historic assets. The scale of change is incompatible with the need to safeguard landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further undermines any assertions of policy compliance.

It is evident that the impacts outlined cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be unavoidable and dominant. Consequently, the resulting changes would be fundamental and permanent, unable to be reduced to an acceptable level through mitigation measures.

Overall, the assessment fails to accurately represent the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These deficiencies 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 for construction within the high-energy Atlantic environment along the West Lewis coastline raises significant concerns regarding its environmental assessment. The application lacks fully developed Construction Environmental Management Plans and Pollution Prevention Plans, instead deferring important mitigation and contingency measures to a post-consent stage. This reliance on undefined future measures hinders a proper evaluation of their adequacy and effectiveness, especially given the sensitivity of the receiving environment.

The coastline is home to clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges the risks of sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on the prevention, control, or monitoring of these risks. Moreover, there is uncertainty regarding the scale and behaviour of sediment plumes

resulting from seabed disturbance and cable installation, which complicates the determination of the extent, duration, or ecological effects of these impacts. This uncertainty is particularly pertinent for marine species and habitats already identified as sensitive in the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. By leaving contingency planning for after consent, the application raises procedural risks and undermines the competent authority's ability to assess the necessary environmental protection measures during the decision-making process. From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime, which stipulates that likely significant effects and mitigation must be assessed prior to granting consent. Without this information, a lawful determination cannot be achieved, and the application does not demonstrate compliance with the relevant policy requirements for environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The application raises significant concerns regarding the assessment of fisheries and marine life, which is inadequate and does not deliver a thorough evaluation of ecological or socio-economic impacts. The area off the West Lewis coast is home to a rich marine ecosystem and a thriving fishing industry. However, the proposal does not sufficiently demonstrate that these critical habitats and uses can be preserved or maintained without considerable disruption.

A notable issue is the presumption that fishing activities can be displaced without adverse effects. The application lacks any evidence indicating the availability, accessibility, or capacity of alternative fishing grounds to accommodate additional pressure. This gap is critical, as such displacement could lead to overfishing in other areas and may have broader economic repercussions for the local fishing fleet. Without a thorough and evidence-backed assessment, understanding the implications for fisheries and local livelihoods remains elusive.

Moreover, the proposed development poses considerable risks to marine species, especially due to the underwater noise produced during construction. The anticipated high-energy hammer piling over a prolonged duration is expected to create disturbances over extensive distances, impacting species such as dolphins. The predicted effects on

a notable portion of the local bottlenose dolphin population raise significant issues, yet the application tends to underestimate these impacts without adequate supporting evidence.

Inconsistencies are evident within the application itself, where it acknowledges the necessity of licences to allow harm to European Protected Species, while simultaneously characterising these impacts as negligible. This contradiction undermines the assessment's credibility and raises questions about compliance with the Habitats Regulations, especially when harm is anticipated to a degree that mandates legal authorisation.

Additionally, the assessment neglects to account for cumulative impacts stemming from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a holistic 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 National Planning Framework 4 or the National Marine Plan. It does not prove that the development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity, thus obstructing any conclusion that the proposal constitutes sustainable development.

When viewed collectively, the deficiencies in the assessment regarding fishing displacement, the minimisation of acoustic impacts, and the internal contradictions render the evaluation incomplete and unreliable. These shortcomings hinder a thorough assessment of the effects on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure associated with this project is incomplete, failing to take into account the extensive impacts of what is fundamentally a single integrated development. The offshore turbines and the onshore works are interconnected yet are evaluated separately, leading to a disjointed analysis that obscures the true environmental and socio-economic consequences.

Central to the onshore works are the plans for cabling across protected moorland, the construction of a substation near Stornoway, and the creation of access routes through sensitive landscapes. These activities involve the excavation of deep peat areas, particularly within Barvas Moor, which serves as a significant carbon store and ecologically sensitive habitat. The application does not provide a thorough examination of these impacts, hindering an accurate understanding of the project's overall environmental footprint.

By neglecting to assess the impacts of onshore works, the application restricts a proper evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all project components must be assessed collectively; however, the distinct treatment of offshore and onshore elements results in an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

Moreover, there are serious risks to sensitive habitats, including machair systems and peatland environments, which hold policy protection. The application fails to demonstrate that the impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures are in place, creating a significant evidential gap regarding biodiversity protection.

Concerns also arise regarding carbon balance, as the disturbance of peatland can release stored carbon, potentially resulting in a carbon debt that undermines the objectives of renewable energy initiatives. The application does not sufficiently address this issue or provide evidence that the overall carbon balance remains positive.

Furthermore, the routing of infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. The application lacks evidence that the required consents or processes have been initiated, leading to doubts about deliverability and legal compliance.

From a policy standpoint, the failure to evaluate the project in its entirety, alongside the inability to ensure the protection of peatlands, habitats, and land use interests, contradicts the National Marine Plan and the National Planning Framework 4. The lack of demonstration that impacts can be avoided or mitigated further weakens the application.

In summary, the fragmented treatment of project components, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts render this aspect of the application incomplete and unreliable, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife represents a substantial oversight within the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are crucial to environmental quality, cultural identity, and tourism value. The proposed development would introduce permanent red aviation lighting that is visible over long distances, resulting in a

continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

There is no evaluation of how this lighting would impact visual amenity, landscape character, or the experiences of residents and visitors. This oversight is particularly concerning given the significance of dark skies to the region's identity and the potential for growth in sectors like astro-tourism. The failure to consider these impacts creates a notable gap in the overall landscape and environmental assessment.

More alarmingly, there is a complete lack of evaluation regarding 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 does not include any assessment of lighting impacts or a phototaxis study, meaning it fails to evaluate how aviation lighting might affect these species or lead to increased mortality.

This issue is exacerbated by the reliance on daytime survey data within the ornithological assessment, which fails to account for nocturnal activities or the associated risks. Additionally, species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation due to artificial lighting, yet this risk remains unassessed. The absence of site-specific data related to night-time conditions leads to a critical void in understanding the ecological impacts.

Without an assessment of the nocturnal impacts, it remains impossible to ascertain whether protected species or designated sites would suffer adverse effects. The necessary evidential standard to exclude adverse effects beyond reasonable scientific doubt cannot be achieved, invoking the precautionary principle and inhibiting a lawful determination.

From a policy standpoint, this omission contradicts National Planning Framework 4 in terms of protecting natural areas and ensuring environmental quality. Furthermore, it undermines the wider evaluation of landscape and seascape impacts, as the character of night-time is a vital aspect of the environment.

In summary, the lack of any assessment regarding dark skies and nocturnal wildlife constitutes a significant evidential gap. The failure to provide baseline data, impact modelling, and species-specific analysis renders the application incomplete and unable to support a lawful determination.

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. The issues that caused the refusal of the Lewis Wind Power proposal in 2008 are repeated in this application. It presents a scale of industrialisation that is still deemed unacceptable, despite being submitted under a policy framework that places increased importance on biodiversity, peatland protection, landscape integrity, and community wellbeing.

There is an inadequate evidential basis for the application. Critical gaps in baseline data exist, and the design envelope remains undefined. Mitigation measures have not been specified, and key impact pathways such as nocturnal wildlife, complete onshore infrastructure, and tourism effects have been omitted. The Environmental Impact Assessment is thus incomplete and does not facilitate a full understanding of likely significant effects or 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, and the omission of a full Social Impact Assessment is a material deficiency. These failures hinder the competent authority from evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

This proposal conflicts with National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural places, or cultural heritage. There is insufficient evidence that health and wellbeing impacts are acceptable, and the absence of tourism impact modelling undermines claims of net economic benefit. The cumulative impact of offshore and onshore elements has not been properly assessed, leaving unclear effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and internally inconsistent. The evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt has not been satisfied, thus engaging the precautionary principle and preventing a lawful conclusion regarding acceptable impacts.

Additionally, 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 relationships, and impacts on tourism are permanent effects that cannot be adequately mitigated.

Overall, the application is unfit for determination both procedurally and substantively. The deficiencies in information, combined with policy conflicts and unresolved environmental risks, inhibit a lawful and evidence-based decision. The competent authority should refuse consent on these grounds or invoke relevant regulatory provisions to obtain the necessary missing information.

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

Member of Public 240

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 for consideration under the appropriate marine licensing and Environmental Impact Assessment frameworks. The basis for this objection arises from a thorough review of the Environmental Impact Assessment Report and its accompanying documentation, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural integrity. Situated off the west side of the Isle of Lewis, the development area is characterised by its Atlantic-facing coastline, nearly untouched environment, and a strong sense of cultural identity. The dimensions, proximity, and design of the proposed wind farm raise critical questions about its alignment with statutory obligations, national policy guidelines, and the principles underlying sustainable development.

The application notably lacks a solid evidential foundation necessary for a lawful decision. Essential environmental data has not been provided, and the baseline information available is both limited and inconsistent. Additionally, key elements of the proposal are not clearly defined. The employment of a flexible design framework obscures the assessment of potential significant effects, and the proposed mitigation measures remain unspecified, rendering it impossible to evaluate their efficacy. Consequently, the documentation does not facilitate a comprehensive understanding of the environmental, cultural, or community impacts, with assertions of negligible or non-significant effects lacking robust evidential support.

Furthermore, there are significant and clear conflicts with established policy. The proposal appears to be at odds with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It fails to adequately demonstrate compliance with national obligations to safeguard biodiversity, climate-related interests, and environmental integrity. These discrepancies directly challenge the statutory criteria necessary for obtaining consent and compromise the capacity of the competent authority to determine the acceptability of the development from a policy standpoint.

The unprecedented scale of this proposal in the given location, featuring large turbines in close proximity to the shoreline, raises substantial concerns regarding landscape capacity, visual impact, and overall environmental consequences. In summary, the

combination of insufficient information, reliance on undefined mitigation measures, evidential shortcomings, and clear non-compliance with policy underscores that the application is incomplete and unable to substantiate a lawful determination. In light of these factors, the precautionary principle should be invoked.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment regarding the cultural heritage and community identity of the West Lewis coastline is fundamentally deficient. It fails to recognise this area as a living cultural landscape where the environment, language, tradition, and community are intricately connected. The application adopts a simplistic view, treating heritage merely as isolated and static assets, rather than appreciating their ongoing social, cultural, and spiritual significance within the community.

A notable shortcoming is the treatment of culturally significant sites, particularly the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active burial and spiritual sites, yet the assessment incorrectly categorises them as static features. This oversight neglects their continued use and meaning, as well as the implications of development on their surroundings. Consequently, this misrepresentation leads to an inadequate evaluation of cultural impacts and ignores their essential role in community life.

Additionally, the assessment does not consider intangible cultural heritage, such as the Gaelic language and traditions, nor the enduring relationship between the community and the coastal environment. These aspects are vital to the area's identity and are completely overlooked, which constitutes a significant omission. Without taking these factors into account, the cultural impact of the proposed development cannot be accurately gauged.

Concerns extend to community rights and engagement, particularly regarding the Gaelic-speaking population, which possesses a unique cultural identity with characteristics of an Indigenous People. However, the application lacks a process of Free, Prior and Informed Consent. This failure to engage meaningfully undermines the legitimacy of the assessment and disregards established principles of participation in decisions impacting cultural and environmental interests.

Moreover, a critical procedural failure is the omission of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. The absence of this assessment hinders the competent authority's ability to fulfil its legal duty to evaluate the social, cultural, and economic effects on the island community. This alone renders a lawful determination impossible.

From a policy standpoint, these shortcomings place the proposal at odds with National Planning Framework 4, particularly concerning the protection of historic assets and places. The neglect to consider both tangible and intangible heritage, alongside living cultural practices, clearly deviates from established policy requirements.

In summary, the collective failures to assess living heritage, intangible cultural values, community rights, and statutory obligations lead to a significant evidential gap. The cultural impacts of the development remain inadequately assessed, and the application fails to provide a robust foundation for evaluating the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the assessment of social impacts, health, and wellbeing is concerning and indicates a material deficiency that undermines lawful evaluation. Although the developer commissioned a Social Impact Assessment, which included focus groups with local residents, the full report remains unpublished. This gap in evidence significantly hinders both public understanding and the competent authority's ability to assess the social risks identified through the developer's research.

Summaries that are available reveal that residents are already dealing with measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts stem from direct engagement with the community and are therefore grounded in reality rather than speculation. However, the absence of the full assessment obstructs proper scrutiny of these findings, limiting the capacity to fully appreciate their significance in the decision-making process.

Moreover, there is evidence to suggest that the proposal poses a threat to community identity and cohesion, with "cultural loss" explicitly noted in the developer's findings. Regrettably, these impacts have not been properly integrated into the main application or given the appropriate consideration they warrant. The failure to disclose the complete Social Impact Assessment obscures the true human and social cost associated with the development.

This lack of transparency also impacts the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health effects is vital for developments of this nature, especially where community character and functioning are at risk. The omission of the full dataset renders the application inadequate for presenting a thorough evidential basis for weighing benefits against harm.

From a policy standpoint, the application does not convincingly demonstrate adherence to the National Planning Framework 4 regarding health and wellbeing.

Development is expected to promote positive health outcomes and mitigate harm, yet the evidence at hand indicates adverse effects that remain undisclosed. Without the full assessment, it is impossible to establish compliance with this policy.

The procedural ramifications are considerable. The competent authority is unable to carry out a robust socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a significant omission within the application, failing to meet the evidential standards required by the Environmental Impact Assessment regime.

In summary, the failure to disclose the complete Social Impact Assessment, alongside the documented evidence of existing adverse effects, renders the assessment incomplete and unreliable. This situation prevents a lawful determination and reinforces the view that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The application does not adequately represent the magnitude of visual change that would result from the introduction of large-scale turbines close to the West Lewis coastline. This area is characterised by its open Atlantic horizon, undeveloped nature, and a profound sense of remoteness. The turbines would create a dominant industrial presence, fundamentally altering the character of the landscape and leading to a permanent and irreversible transformation.

There are significant methodological concerns regarding how visual viewpoints were selected and presented. Evidence indicates that these viewpoints may not effectively represent the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the risk of underestimating the magnitude of visual impact, which undermines the reliability of the assessment.

The assessment fails to sufficiently acknowledge the interconnected relationships between the landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are not recognised as part of a wider landscape setting, which diminishes their cultural significance and the visual and spatial connections to the Atlantic horizon. Treating these sites as isolated assets leads to an incomplete evaluation of impacts on their setting.

The industrialisation of the seascape would sever these important relationships, altering how heritage assets are experienced and disrupting their ties to the natural horizon. This represents not only a significant visual impact but also a broader cultural and spatial harm that the application does not adequately assess.

From a policy perspective, the proposal conflicts with National Planning Framework 4 concerning the protection of natural places and historic assets. The extent of change it proposes is incompatible with safeguarding landscape character, visual amenity, and the settings of culturally significant sites. Moreover, the lack of a robust worst-case assessment further challenges 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 dominant and unavoidable. Therefore, the resulting changes are fundamental and permanent, not amenable to acceptable levels of reduction through mitigation efforts.

Overall, the assessment is deficient as it does not accurately portray 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.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm highlights significant shortcomings in terms of sustainable development, as it fails to meet the requirements outlined by statutory duties and national policy. This application echoes the central issues associated with the earlier Lewis Wind Power proposal, which was rejected in 2008 due to its unacceptable level of industrialisation. Although it is now presented within a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, these improvements do not resolve the fundamental problems.

A reliable evidential basis for this application is lacking. There are critical gaps in baseline data, and the use of an undefined design envelope raises concerns. The reliance on unspecified mitigation measures is particularly troubling, as is the failure to consider essential impact pathways such as nocturnal wildlife, the full scope of onshore infrastructure, and the potential effects on tourism. As a result, the Environmental Impact Assessment is incomplete and does not adequately inform on likely significant effects or residual impacts.

In terms of procedural integrity, there are notable failures present. The lack of a compliant Island Communities Impact Assessment is a breach of statutory duty under the Islands (Scotland) Act 2018. Furthermore, the omission of a complete Social Impact Assessment is material, obstructing the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These deficiencies render the application unsuitable for determination.

This proposal is also at odds with National Planning Framework 4. It does not demonstrate sufficient protection for biodiversity, natural environments, and cultural heritage. Additionally, it fails to provide acceptable evidence regarding health and wellbeing impacts, nor does it show a net economic benefit owing to the absence of tourism impact modelling. Furthermore, the cumulative effects of both offshore and onshore components have not been assessed properly, thus obscuring potential impacts on peatlands, carbon balance, habitats, and crofting lands.

Uncertainty surrounds the environmental risks associated with this proposal. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also inconsistent in places. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been reached, necessitating the application of the precautionary principle and making it impossible to conclude that impacts are acceptable.

There are concerns regarding substantial and irreversible alterations to a highly sensitive landscape as a result of this proposal. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, and the disruption to cultural and visual relationships, along with impacts on tourism, will lead to permanent effects that cannot be adequately mitigated.

In summary, this application is both procedurally and substantively unfit for determination. The multitude of information deficiencies, alongside policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. Therefore, it is requested that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Member of Public 241

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. The application has been submitted under the applicable marine licensing and Environmental Impact Assessment regimes. This objection arises from an examination of the Environmental Impact Assessment Report and its associated documents, which reveal significant deficiencies in planning, environmental assessment, cultural considerations, and procedural adherence. 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 have been raised regarding the scale, proximity, and design of the proposal, which challenge its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis for a lawful decision-making process. Essential environmental data is absent, the baseline information provided is both limited and inconsistent, and crucial elements of the proposal remain unclear. The flexible design framework used within the application inhibits a comprehensive assessment of potential significant effects, while the reliance on unspecified mitigation measures renders their effectiveness unassessable. Consequently, the documentation fails to facilitate a thorough understanding of the environmental, cultural, or community impacts, and assertions regarding negligible or non-significant effects lack robust supporting evidence.

There exist substantive conflicts with established policies. The proposal is inconsistent 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 aimed at safeguarding biodiversity, climate considerations, and environmental integrity. Such conflicts directly affect the statutory tests required for consent, thereby compromising the competent authority's ability to conclude that the development adheres to policy standards.

The scale of the proposed development is unprecedented for this area, with large turbines positioned in close proximity to the shoreline, raising substantial concerns regarding landscape capacity, visual dominance, and environmental ramifications. Collectively, the lack of adequate information, reliance on undefined mitigation

strategies, evidential shortcomings, and clear policy non-compliance indicate that the application is incomplete and incapable of sustaining a lawful determination. In light of these circumstances, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies that undermine its reliability and transparency regarding the environmental effects of the proposal. It utilises a flexible Project Design Envelope, which lacks specific commitments to turbine dimensions, layouts, or configurations. This absence of defined parameters introduces uncertainty and complicates the ability to apply a worst-case scenario consistently. Consequently, the impacts reported may not align with the development that is ultimately constructed, inhibiting both public understanding and the competent authority's ability to gauge the true environmental consequences.

Furthermore, the application is heavily contingent on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent on the premise that environmental harm will be addressed later impedes a thorough evaluation of effectiveness and an assessment of residual impacts. Such deferral of critical information to post-consent stages is procedurally unacceptable and runs counter to the intended purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation measures be clearly identified prior to determination.

The assessment also suffers from notable evidential weaknesses, including inadequacies in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This results in uncertainty about the scale and significance of impacts, especially when conclusions suggest negligible or non-significant effects without robust supporting data. The lack of sufficient information prevents a clear understanding of cumulative and worst-case impacts, creating scientific uncertainty that is incompatible with statutory obligations.

As a result, the application does not fulfil the evidential requirements outlined in the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Moreover, the proposal does not demonstrate compliance with National Planning Framework 4, especially regarding biodiversity protection and environmental integrity, since it cannot be shown that all 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 the gaps in baseline data renders the Environmental Impact

Assessment Report unreliable and incomplete. These shortcomings preclude a lawful and robust assessment of environmental effects, leaving the competent authority unable to determine the application based on the information currently available.

ASSESSMENT OF ALTERNATIVES

The application fails to adequately assess alternatives, falling short of the statutory requirements outlined in the Environmental Impact Assessment regime. Instead of offering a systematic and reasoned comparison of feasible alternatives based on their environmental impacts, the submission presents a narrative detailing the evolution of the project. This method does not adequately establish that less harmful options have been thoroughly identified, evaluated, and selected over more damaging alternatives.

There is a noticeable lack of transparency and evidence in the comparison of different offshore locations, development scales, and design configurations. Specifically, the application does not indicate that the developer has genuinely contemplated positioning turbines further offshore, where potential visual, ecological, and coastal impacts would likely be diminished. Considering the delicate nature of the West Lewis coastline and the critical significance of proximity to shore in determining impact, the failure to conduct such analysis obstructs any conclusion that the proposed location is the least damaging option.

This inadequacy also extends to the assessment of cable routing and landfall, where there is insufficient evidence showing that alternative routes have been properly investigated to avoid or reduce impacts on sensitive receptors, including sites of cultural and spiritual significance such as Barvas Cemetery. The lack of a clear strategy for avoidance and the absence of comparative analysis suggest that mitigation by design has not been utilised, relying instead on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This represents a deviation from the established mitigation hierarchy and hinders the competent authority's ability to ascertain whether less harmful and more appropriate alternatives are available. In the absence of a comprehensive alternatives assessment, it cannot be concluded that the proposal constitutes a sustainable or policy-compliant solution.

From a policy standpoint, this deficiency compromises adherence to National Planning Framework 4, especially regarding the protection of natural environments, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission, contributing to the overarching conclusion that

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally inadequate, failing to deliver a comprehensive or reliable understanding of ecological receptors within the West Lewis coastal environment. This marine system is both highly sensitive and biologically active, yet the baseline data is lacking, and the methodologies employed do not sufficiently capture the presence, behaviour, and habitat use of various species. Consequently, the assessment does not offer a solid evidential basis for evaluating potential impacts.

A notable shortcoming is the omission of 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. This oversight in considering their core foraging range and behavioural patterns means that the potential effects of construction disturbance, noise, and increased activity remain insufficiently assessed. As a result, any conclusions drawn regarding the absence of significant effects on this species are compromised.

Further methodological deficiencies emerge in the assessment of basking sharks. The reliance on aerial surveys introduces a significant detection bias, particularly in the challenging conditions of the Atlantic. This method is likely to underestimate the presence of these sharks, especially when compared to established land-based observations that indicate frequent usage of these waters. The failure to incorporate or properly consider such critical data leads to an incomplete baseline and diminishes the reliability of the conclusions reached.

These methodological shortcomings imply that any conclusions suggesting negligible or non-significant effects are largely based on assumptions rather than robust evidence. Moreover, the absence of adequate baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This results in uncertainty regarding the actual level of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set out by the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainty introduced undermines the ability to exclude adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it is clear that consent cannot be lawfully granted.

In summary, the presence of incomplete baseline data, flawed methodologies, and unsupported conclusions ultimately renders the assessment unreliable. These deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species and collectively support the conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already experiencing decline. The ornithological assessment associated with the application is fundamentally flawed, containing significant gaps in evidence and internal inconsistencies that compromise its conclusions. The application fails to meet the required evidential standard to demonstrate that these seabird species will not be adversely affected. It is situated within key foraging areas and migratory pathways, yet does not adequately assess the implications of displacement, collision risk, or habitat loss for these vulnerable species.

A critical contradiction is evident, as the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises serious concerns regarding the reliability of the assessment and suggests that its conclusions lack support from the underlying evidence. 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 recognised, and reliance on modelling approaches introduces uncertainty, particularly for species in severe decline like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, especially where baseline data is lacking and behavioural responses are not fully understood.

The placement of turbines within a recognised migratory corridor creates an additional, significant risk, as it effectively obstructs a primary flight path used by species migrating between the United Kingdom and Iceland. Furthermore, the application does not sufficiently evaluate the long-term implications of sustained mortality in this corridor or the potential effects on species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential threshold required to ascertain no adverse effect 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 attained. This situation engages the precautionary principle, preventing a lawful

conclusion in favour of consent.

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

In summary, the assessment is unreliable, marked by internal inconsistencies, methodological weaknesses, and insufficient evidence. These shortcomings hinder a robust evaluation of impacts and lead to the overall conclusion that the application does not meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage in the application is severely lacking, failing to recognise the West Lewis coastline as a dynamic cultural landscape where environment, tradition, language, and community are interwoven. The approach adopted is overly simplistic, treating heritage as a collection of isolated and static assets, disregarding their ongoing social, spiritual, and cultural significance within the community.

Particularly concerning is the treatment of important cultural sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are not merely static features; they are active sites of burial and spiritual practice. However, the assessment reduces them to mere objects, ignoring their continued significance, meaning, and the potential impact of development on their surroundings. This misrepresentation leads to an incomplete understanding of cultural effects and dismisses their importance in the lives of the community.

Moreover, the application overlooks intangible cultural heritage, including the Gaelic language and longstanding community ties to the coastal environment. These aspects are crucial to the area's identity but are completely absent from the assessment, constituting a significant oversight. The failure to acknowledge these elements means that the cultural implications of the development cannot be fully grasped.

Concerns extend to the rights and engagement of the community. The Gaelic-speaking population embodies a distinct cultural identity recognised as characteristic of Indigenous Peoples. Yet, there has been no process of Free, Prior and Informed Consent. This lack of meaningful involvement not only weakens the validity of the assessment but also fails to uphold the established principles of community participation in decisions affecting cultural and environmental interests.

Furthermore, a serious procedural oversight is the failure to provide 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 cannot meet its legal obligation to assess the social, cultural, and economic impacts on the island community. This alone renders a lawful determination impossible.

From a policy standpoint, these shortcomings place the proposal at odds with National Planning Framework 4, especially regarding the safeguarding of historic assets and places. The neglect to consider both tangible and intangible heritage, alongside the failure to acknowledge living cultural practices, clearly deviates from policy requirements.

In summary, the neglect to assess living heritage, intangible cultural value, community rights, and statutory responsibilities culminates in a considerable evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application does not present a solid foundation for understanding the true cultural cost associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the Social Impact Assessment fundamentally undermines the evaluation of social impacts, health, and wellbeing within the proposed development. Although the developer commissioned this assessment, which included focus groups with local residents, the complete report remains unpublished. This significant evidential gap obstructs both public understanding and the competent authority's ability to grasp the full scope of social risks highlighted in the developer's own findings.

Residents have already reported measurable stress, anxiety, and concern stemming from the scale and proximity of the proposal. These impacts, arising from direct engagement with the community, are concrete rather than speculative. However, the absence of the full assessment hinders proper scrutiny of these findings and limits the capacity to understand their implications in the decision-making process.

Moreover, there is clear evidence that the proposal is seen as a threat to community identity and cohesion, with references to “cultural loss” found in the developer's own assessments. Despite this, these critical impacts have not been sufficiently incorporated into the main application or assigned appropriate significance. By withholding the complete Social Impact Assessment, the developer obscures the genuine human and social costs associated with the development.

This situation not only affects the Environmental Impact Assessment process but also

the overall understanding of the social, economic, and health implications of such a significant development, particularly when community character and functioning are at stake. Without access to the full dataset, the application lacks a solid evidential foundation for weighing benefits against harms.

From a policy standpoint, the application fails to align with National Planning Framework 4 regarding health and wellbeing. Developments are required to foster positive health outcomes and avoid adverse impacts, yet the existing evidence points to negative effects that have not been fully revealed. Consequently, without the complete assessment, it cannot be shown that the application complies with relevant policy requirements.

The procedural ramifications are considerable. The competent authority is unable to perform a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This omission constitutes a material shortcoming within the application, reflecting a failure to meet the evidential standards set forth by the Environmental Impact Assessment framework.

In summary, the non-disclosure of the complete Social Impact Assessment, coupled with evidence of existing negative impacts, leads to an incomplete and unreliable assessment. This situation obstructs a lawful determination and reinforces the argument that the application is unsupported by adequate information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual and seascape impacts surrounding the proposal is fundamentally inadequate and does not properly account for the scale of change or the sensitivity of the environment in question. The West Lewis coastline is characterised by its unspoiled Atlantic horizon, a largely undeveloped nature, and a profound sense of remoteness. Should large-scale turbines be introduced near the shoreline, their presence would create an overwhelming industrial landscape, irrevocably changing the character of the area and leading to a permanent transformation of the landscape.

Moreover, the application fails to accurately depict the extent of the visual alterations anticipated. The size and proximity of the turbines would dominate vistas from residential locales, historic sites, and popular coastal areas, directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment does not adequately convey the significance of these impacts within the context of such a sensitive environment.

Concerns also arise regarding the methodology used in selecting and presenting visual viewpoints. Evidence suggests that certain viewpoints may not adequately represent

the most sensitive receptors or the worst-case scenarios, particularly concerning significant cultural heritage sites and landscapes of high value. This risk implies that the visual impact may have been understated, casting doubt on the reliability of the assessment.

Another notable shortcoming is the lack of an evaluation of the interconnected nature of landscape, seascape, and cultural heritage. Key sites, including the Calanais Standing Stones and other Scheduled Monuments, are intrinsically linked to their wider landscape through visual and spatial relationships with the Atlantic horizon. The assessment treats these heritage assets in isolation, failing to acknowledge their interdependence, which leads to an incomplete understanding of the impacts on their setting and cultural significance.

The potential industrialisation of the seascape would disrupt these connections, thereby altering how heritage assets are perceived and diminishing their ties to the natural horizon. This signifies not just a visual concern, but a broader cultural and spatial detriment that has not been sufficiently addressed in the application.

From a policy standpoint, the proposal contravenes National Planning Framework 4 regarding the protection of natural environments and historic assets. The anticipated changes contradict the imperative to preserve landscape character, visual amenity, and the contextual integrity of culturally significant sites. The failure to conduct a comprehensive worst-case assessment further undermines any assertion of policy compliance.

Additionally, it is evident that the identified impacts cannot be adequately mitigated. Given the scale, height, and proximity of the turbines, their presence would be both prominent and inescapable. The resulting transformation is consequently 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 magnitude of impact, the sensitivity of the environment, or the interconnectedness of landscape and heritage. These deficiencies hinder a reliable evaluation and reinforce the conclusion that the proposal is inconsistent with the safeguarding of this landscape.

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 application presents significant deficiencies in its assessment of fisheries and marine life, failing to provide a reliable evaluation of ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and a thriving fishing industry, yet the proposal does not adequately demonstrate that these

vital habitats can be preserved without considerable disruption.

One major concern is the unsubstantiated assumption that fishing activity can be displaced without adverse effects. There is no evidence provided to indicate that alternative fishing grounds exist, are accessible, or are capable of accommodating increased pressure from displaced fishing efforts. This oversight is critical, as the potential for overfishing in other areas poses economic risks for the local fishing fleet. The absence of a thorough, evidence-based assessment means that the implications for fisheries and local livelihoods remain unclear.

Furthermore, the proposal poses significant risks to marine species, particularly due to the underwater noise generated during construction activities. The anticipated high-energy hammer piling over extended periods is likely to disturb marine life over considerable distances, impacting species such as dolphins. The predicted disturbance to a significant proportion of the local bottlenose dolphin population raises urgent concerns, yet the application diminishes the importance of these effects without adequate supporting evidence.

There exists a notable inconsistency within the application, where the necessity for licences to permit harm to European Protected Species is acknowledged, while simultaneously downplaying the impacts as negligible. This contradiction undermines the credibility of the assessment and raises serious questions about compliance with the Habitats Regulations, especially in instances where harm is expected to a degree that requires legal authorisation.

The assessment also overlooks the cumulative impacts resulting from various pressures, such as habitat disturbance, noise pollution, 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 fails to demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not provide evidence that the proposed development can coexist with existing marine users or that it can avoid unacceptable impacts on marine biodiversity, obstructing any conclusion that the proposal constitutes sustainable development.

In summary, the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies render the assessment insufficient and unreliable. These shortcomings impede a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The onshore works associated with the project, including cabling across protected moorland and the construction of a substation near Stornoway, introduce significant risks to sensitive habitats. The proposed access infrastructure runs through landscapes that are ecologically fragile, particularly involving excavation across deep peat areas, notably within Barvas Moor, which serves as a crucial carbon store and sensitive habitat. The application fails to provide a comprehensive assessment of these impacts, which hinders a full understanding of the project's environmental footprint.

The risks extend to the machair systems and peatland environments, which are protected under existing policy. The application does not demonstrate that the impacts on these habitats have been thoroughly evaluated, nor does it show that appropriate avoidance measures have been implemented. This represents a substantial evidential gap concerning biodiversity protection.

Moreover, the assessment of onshore infrastructure is materially incomplete as it considers the offshore turbines and onshore works separately. This fragmented approach obscures the true scale of the environmental and socio-economic effects, preventing a proper evaluation of cumulative impacts. The Environmental Impact Assessment process mandates that all components of a project be assessed together; however, the separation of offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities are not adequately understood.

The disturbance of peatland associated with these works raises serious concerns about carbon balance. The release of stored carbon could lead to a carbon debt that undermines the very objectives of renewable energy development. Yet the application does not sufficiently address this issue or demonstrate that the overall carbon balance remains positive.

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

From a policy standpoint, the failure to assess the project holistically and to demonstrate protection for peatlands, habitats, and land use interests is at odds 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. Consequently, 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 proposed application introduces permanent red aviation lighting that would create a continuous and intrusive "wall of light" effect across the western horizon. This lighting is visible over long distances and fundamentally alters the night-time environment. A significant concern arises from the absence of an assessment regarding the impacts of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. Dark skies are a key component of environmental quality, cultural identity, and tourism value in the West Lewis coastline, which is characterised by exceptionally dark skies. The lack of consideration for the importance of dark skies, particularly in relation to emerging sectors such as astro-tourism, creates a substantial gap in the Environmental Impact Assessment.

Moreover, there is no evaluation of the impacts on nocturnal wildlife, despite the presence of sensitive species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, which are susceptible to disorientation and increased collision risk due to artificial lighting. The application fails to include a lighting impact assessment or phototaxis study, thereby neglecting to evaluate how the aviation lighting might affect these species and potentially increase mortality rates. The reliance on daytime survey data in the ornithological assessment further compounds this issue, as it does not capture 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 assessed.

The lack 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 is impossible to determine whether protected species or designated sites would be adversely affected. Consequently, the evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt cannot be met, which engages the precautionary principle and prevents a lawful determination.

From a policy standpoint, this omission conflicts with National Planning Framework 4 concerning the protection of natural places and environmental quality. It also undermines the broader assessment of landscape and seascape impacts, as night-time character is an integral aspect of the environment. Overall, the absence of any assessment of dark skies and nocturnal wildlife represents a significant evidential gap. The application lacks baseline data, impact modelling, and species-specific analysis, rendering it incomplete and incapable of supporting a lawful determination.

TOURISM

The application acknowledges that 86% of visitors to the Isle of Lewis are attracted by its scenery. However, it does not provide any quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of tourism. This is particularly concerning given that tourism has seen substantial growth, rising 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.

Furthermore, the assessment overlooks the critical role of environmental quality in sustaining tourism, such as the significance of unspoiled landscapes and dark skies for visitor experiences. Emerging markets like nature-based tourism and astro-tourism rely heavily on these attributes. The failure to include a Dark Skies Assessment exacerbates this issue, leaving a considerable gap in understanding the impacts on a recognised and expanding sector of the local economy.

In an island community where economic diversification is limited, the lack of assessment regarding tourism impacts has broader implications for employment, local businesses, and community sustainability. Additionally, the absence of a compliant Island Communities Impact Assessment means that the economic vulnerabilities associated with tourism 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, particularly concerning economic impacts and the necessity to showcase a net benefit. It also contradicts strategic objectives that highlight tourism as a priority growth sector, failing to provide adequate evidence for the competent authority to assess the economic consequences of the proposal.

Overall, the combination of not quantifying tourism impacts, neglecting environmental drivers of visitor behaviour, and disregarding the island's economic dependency leads to a significant evidential gap. This absence of thorough analysis hinders a robust evaluation of economic effects and suggests that the application remains incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed and does not meet the requirements of sustainable development as outlined in statutory duties and national policy. It mirrors the core issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Now, under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the

proposal still fails to address these concerns adequately.

There are significant gaps in the evidential basis for the proposal. It does not include comprehensive baseline data and continues to utilise an undefined design envelope. Furthermore, it relies on unspecified mitigation measures and omits critical impact pathways, such as those related to nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, limiting the understanding of likely significant effects and residual impacts.

Procedural issues also mar the application. The lack of a compliant Island Communities Impact Assessment violates the Islands (Scotland) Act 2018, while the failure to provide a complete Social Impact Assessment represents a material omission. These shortcomings hinder the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal conflicts with the National Planning Framework 4 as it does not adequately protect biodiversity, natural places, and cultural heritage. It fails to establish that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, as tourism impact modelling has not been conducted. The assessment of the cumulative impact from both offshore and onshore elements is inadequate, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal are uncertain and potentially significant. Evaluations of marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in parts. The evidential threshold required to demonstrate the absence of 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 cause 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 impacts on tourism create permanent effects that cannot be adequately mitigated.

In summary, the application is 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 should refuse consent for the Spiorad na Mara Offshore Wind Farm application in its entirety.

Additional Comments

This proposal will utterly change one of our last wild places in UK. Massive impact on the community and infrastructure here - there's no going back - the beauty and special historical nature of the island will be very much undermined and we will never get that back

Please DONT DO THIS

Member of Public 242

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 marine licensing and Environmental Impact Assessment regimes. The concerns raised are founded upon a careful review of the Environmental Impact Assessment Report and its supporting documentation, which reveal substantial deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The development is situated off the west side of the Isle of Lewis, a region characterised by its stunning Atlantic coastline, near-pristine surroundings, and rich cultural heritage. The dimensions, proximity, and design of this proposal give rise to significant doubts about its alignment with statutory requirements, national policy, and sustainable development principles.

The application notably lacks a sufficient evidential foundation for a lawful decision. There is a concerning absence of critical environmental data, while the baseline information provided is both limited and inconsistent. Additionally, numerous key elements of the proposal remain undefined. The use of a flexible design framework results in an unclear understanding of potential significant effects, and the reliance on unspecified mitigation measures hinders any assessment of their potential effectiveness. Consequently, the documentation fails to furnish a comprehensive and informed view of the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by robust evidence.

Moreover, there are evident and substantial conflicts with policy. The proposal does not appear to comply with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, especially concerning biodiversity, natural habitats, cultural heritage, and the wellbeing of the community. It does not establish that the national obligations to safeguard biodiversity, climate interests, and environmental integrity will be fulfilled. These discrepancies directly impact the statutory tests essential for granting consent and weaken the authority's capacity to deem the development acceptable from a policy perspective.

Furthermore, the scale of the proposal is unprecedented for this particular location, with large turbines proposed in close proximity to the shoreline. This raises significant worries regarding the landscape's capacity, visual dominance, and potential environmental repercussions. Collectively, the lack of sufficient information,

dependence on undefined mitigation measures, evidential shortcomings, and clear non-compliance with policy suggest that the application is incomplete and incapable of supporting a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is deficient and does not offer a complete or reliable assessment of the likely environmental effects of the proposal. The lack of commitment to specific turbine dimensions, layouts, or configurations, due to the use of a flexible Project Design Envelope, creates significant uncertainty. This compromises the integrity of the assessment and means that the impacts reported may not align with the actual development, hindering both public understanding and the competent authority's ability to gauge the true extent of environmental effects.

Furthermore, the application relies on mitigation measures, monitoring strategies, and management plans that remain undefined. Consent is sought based on the assumption that environmental harm will be addressed later, which obstructs any meaningful evaluation of effectiveness or assessment of residual impacts. This delay in providing crucial information until after consent is granted is procedurally unacceptable and contradicts the Environmental Impact Assessment regime's purpose, which stipulates that likely significant effects and mitigation must be clearly established prior to determination.

There are also significant evidential gaps, 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 negligible or non-significant effects are reported without strong supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot comply with statutory requirements.

As a result, the application does not meet the evidential threshold necessary under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, including stipulations about biodiversity protection and environmental integrity, as it has not been shown that impacts have been thoroughly assessed or that suitable safeguards exist.

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

Report unreliable and incomplete. These shortcomings prevent a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make a decision based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment regarding marine ecology and protected species is lacking and fails to offer a thorough understanding of ecological receptors in the West Lewis coastal environment. This region is known for its biological activity and sensitivity, yet the baseline data presented is incomplete, and the methodologies used do not effectively capture the presence, behaviour, or habitat utilisation of various species.

Consequently, the assessment lacks a reliable evidential foundation for evaluating potential impacts.

An important oversight in this assessment pertains to otters, a species protected under European law. The application does not adequately acknowledge or evaluate their active utilisation of coastal areas for foraging and movement. The failure to consider their primary foraging ranges and behavioural patterns leads to an insufficient assessment of how construction-related disturbances, noise, and increased activity may affect them. This oversight raises questions about the validity of any conclusions drawn regarding the absence of significant effects on this species.

Further shortcomings are evident in the evaluation of basking sharks. The heavy reliance on aerial surveys introduces a significant detection bias, especially in the challenging conditions often found in the Atlantic. This methodology likely underrepresents the actual presence of these sharks, in contrast to established land-based observations that indicate their frequent presence in these waters. By neglecting to include or adequately consider such data, the assessment presents an incomplete baseline and diminishes the credibility of its findings.

The methodological flaws mean that the conclusions regarding negligible or non-significant effects are based more on assumptions than on solid evidence. Without adequate baseline data, it is not possible to carry out a meaningful assessment of cumulative and indirect impacts, such as seasonal variations or broader ecosystem interactions. This introduces uncertainty regarding the actual level of risk posed to marine species and their habitats.

From a regulatory standpoint, the application does not comply with the requirements set out by the Environmental Impact Assessment regime and National Planning Framework 4, as the identification and assessment of protected species have not been performed properly. The resulting uncertainty makes it impossible to rule out adverse effects with reasonable scientific confidence, necessitating the application of the

precautionary principle. In light of these issues, granting consent is not legally justifiable.

In summary, the combination of incomplete baseline data, inadequate methodologies, and unsubstantiated conclusions renders the assessment unreliable. These flaws hinder a comprehensive evaluation of the impacts on marine ecology and protected species and underscore that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment concerning ornithology is fundamentally flawed, exhibiting substantial gaps in evidence and internal contradictions that compromise its conclusions. The west coast of the Isle of Lewis is known for hosting seabird populations of international importance, many of which are already in decline. However, the application fails to convincingly establish that these species will not suffer adverse effects. The proposed development is situated within vital foraging areas and migratory routes, yet the assessment does not adequately address the risks associated with displacement, collision, or habitat loss.

A critical inconsistency is evident in the application, where the developer asserts that there will be no significant adverse effects while simultaneously presenting a case for derogation under the Habitats Regulations, which is required only when significant harm is anticipated. This contradiction raises serious doubts regarding the reliability of the assessment and suggests that its conclusions lack adequate support from the evidence provided.

Insufficient evidence is presented to show that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will be unaffected. The significance of these feeding grounds is not comprehensively recognised, and reliance on modelling techniques injects uncertainty, particularly for species facing serious decline like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, especially given the incomplete baseline data and the lack of understanding regarding behavioural responses.

Locating turbines within a recognised migratory corridor introduces a substantial risk, effectively acting as a barrier along a primary flight path for species migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term implications of continuous mortality within this corridor or the potential impacts on species with relatively small global populations.

Regulatory aspects reveal that 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 conflicting conclusions, along with gaps in data and limitations in modelling, indicates that the requisite standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle and hinders a lawful conclusion in favour of consent.

Moreover, the identified deficiencies signify non-compliance with National Planning Framework 4 concerning biodiversity protection and the preservation of natural assets. The failure to demonstrate that internationally important seabird populations will remain unaffected directly contradicts national policy.

In summary, the assessment lacks reliability due to its internal inconsistencies, methodological flaws, and insufficient evidence. These deficiencies hinder a thorough evaluation of impacts, leading to the overarching conclusion that the application fails to fulfil the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment regarding cultural heritage and community identity is fundamentally flawed and fails to recognise the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply intertwined. The application adopts a simplistic viewpoint, treating heritage as isolated and static assets, neglecting their ongoing social, cultural, and spiritual significance 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; however, the assessment erroneously categorises them as static features, ignoring their continued relevance and the implications of development on their surroundings. This misrepresentation leads to an incomplete assessment of cultural impacts and overlooks their integral role in community life.

Moreover, the application fails to consider intangible cultural heritage, which encompasses the Gaelic language, traditions, and the longstanding relationship between the community and the coastal environment. These aspects are fundamental to the identity of the area but are entirely omitted from the assessment, representing a significant oversight. Without acknowledging these elements, it is impossible to fully comprehend the cultural implications of the proposed development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population possesses a unique cultural identity, recognised as having characteristics of an Indigenous People, yet the process of Free, Prior and Informed Consent has not been conducted. This lack of meaningful engagement undermines the legitimacy of the

assessment and neglects to reflect established principles regarding participation in decisions that impact cultural and environmental interests.

A critical procedural deficiency 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 is unable to fulfil its legal obligation to evaluate the social, cultural, and economic effects on the island community. This omission alone renders a lawful determination unachievable.

From a policy standpoint, these deficiencies place the proposal at odds with National Planning Framework 4, particularly concerning the protection of historic assets and sites. The neglect to consider both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, signifies a clear deviation from policy requirements.

Overall, the lack of assessment regarding living heritage, intangible cultural value, community rights, and statutory obligations creates a considerable evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application fails to provide a sufficient foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing is fundamentally inadequate and lacks the necessary transparency for a lawful evaluation. The developer engaged in a Social Impact Assessment that included focus groups with local residents; however, the complete report has not been made public. This gap in evidence prevents both the public and the competent authority from grasping the full extent of the social risks highlighted by the developer's own research.

Summaries that are available show that residents are experiencing notable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts come from direct engagement and are not based on speculation. The lack of disclosure of the full assessment obstructs proper scrutiny of the findings and diminishes the capacity to assess their significance in the decision-making process.

Moreover, there is evidence suggesting that the proposal is viewed as a threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. Despite this acknowledgment, these impacts have not been adequately incorporated into the primary application or given the necessary consideration. The failure to release the full Social Impact Assessment obscures the true social and human costs associated with the development.

This absence of transparency compromises the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning are at stake. By withholding the complete dataset, the application fails to provide a comprehensive evidential foundation for assessing the balance of benefits and harms.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Developments must foster positive health outcomes and mitigate harm, yet the evidence currently available suggests there are adverse effects that have not been fully revealed. Without access to the complete assessment, compliance with this policy remains unproven.

The procedural ramifications are significant. The competent authority cannot conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This omission is material and represents a failure to meet the evidential standards required by the Environmental Impact Assessment framework.

In summary, the failure to disclose the full Social Impact Assessment, in conjunction with evidence of existing negative impacts, results in an incomplete and unreliable assessment. This hinders a lawful determination and reinforces the conclusion that the application is not backed by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The application lacks an adequate assessment of the seascape, landscape, and visual impacts, failing to capture the sensitivity of the receiving environment and the extent of change. The West Lewis coastline is characterised by its open Atlantic horizon, its undeveloped nature, and a profound sense of remoteness. The proposed large-scale turbines, situated close to the shoreline, would create a continuous and imposing industrial presence that would fundamentally alter this character, leading to a permanent and irreversible transformation of the landscape.

The visual change associated with the development has not been appropriately represented. Due to the size and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations, adversely affecting visual amenity and undermining the qualities that define naturalness and remoteness. The assessment does not adequately convey the significance of this impact in relation to such a sensitive landscape.

There are significant methodological issues concerning the choice and presentation of

visual viewpoints. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly regarding important cultural heritage sites and high-value landscapes. This raises concerns that the actual magnitude of the visual impact has been understated, which undermines the credibility of the assessment.

Additionally, the application fails to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a wider landscape context linked by visual and spatial relationships to the Atlantic horizon. The assessment addresses these assets as isolated entities, neglecting their interdependence and resulting in an incomplete evaluation of impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would sever these crucial relationships, altering how heritage assets are perceived and disrupting their connection to the natural horizon. This situation represents not just a visual impact but a broader cultural and spatial detriment that has not been adequately addressed within the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, particularly concerning the safeguarding of natural places and historic assets. The scale of change is incompatible with the need to protect landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the lack of a thorough worst-case assessment diminishes the claim of policy compliance.

It is evident that the impacts identified are beyond effective mitigation. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. Consequently, the resulting change is fundamental and permanent, not 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 interconnectedness of landscape and heritage. These shortcomings obstruct a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The evaluation of construction and pollution risks associated with the proposal is significantly inadequate and lacks the necessary detail to properly assess the potential environmental impacts. The initiative entails extensive seabed preparation and installation operations in a high-energy Atlantic setting, 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 are to be formulated after consent has been granted, thereby obstructing any thorough assessment of their adequacy or effectiveness.

This dependency on unspecified future measures raises considerable concerns, particularly in light of the sensitivity of the receiving environment. The coastline of West Lewis is home to clean coastal waters and critical habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges certain risks, such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail regarding the prevention, control, or monitoring of these risks.

Furthermore, there is ambiguity surrounding the magnitude and behaviour of sediment plumes resulting from seabed disturbance and cable installation. In the absence of robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty further extends to the potential effects on marine species and habitats that have already been identified as vulnerable in the broader assessment.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning to a post-consent phase, the application precludes an evaluation of whether suitable safeguards are in place to address pollution incidents. This introduces procedural risks and undermines the ability of the competent authority to adequately assess environmental protection measures at the time of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. It is essential that significant effects and mitigation strategies be evaluated prior to granting consent; failure to provide such information renders a lawful determination unachievable. Additionally, the application does not satisfactorily demonstrate compliance with policy requirements pertaining to environmental protection and water quality.

In summary, the lack of defined mitigation measures, absence of detailed management plans, and uncertainty regarding possible impacts culminate in a materially deficient assessment. These deficiencies hinder a rigorous evaluation of construction and pollution risks, further reinforcing the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal presents significant shortcomings in its assessment of fisheries and marine life, failing to provide a thorough evaluation of ecological and socio-economic

impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry, yet the application does not adequately demonstrate how these uses and habitats can be protected or maintained without major disruption.

One critical concern is the assumption that fishing activities can be displaced without consequences. The application lacks evidence to confirm that alternative fishing grounds are available, accessible, or can sustain additional pressure. This is a serious oversight, as displacement could lead to overfishing in other areas and could have broader economic implications for the local fishing fleet. The absence of a clear and evidence-based assessment means that the potential impacts on fisheries and local livelihoods remain poorly understood.

Furthermore, the proposal introduces substantial risks to marine species, particularly due to underwater noise from construction activities. The use of high-energy hammer piling for extended periods is expected to cause disturbances over considerable distances, which could adversely affect species like dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises alarming issues, yet the application minimises the importance of these impacts without adequate supporting evidence.

Inconsistent statements within the application also raise concerns. While it acknowledges the need for licences to permit harm to European Protected Species, it simultaneously describes the anticipated impacts as negligible. This contradiction undermines the credibility of the assessment and raises doubts about compliance with the Habitats Regulations, especially where harm is expected to occur at levels requiring legal authorisation.

Additionally, the assessment does not address cumulative impacts resulting from multiple pressures, such as habitat disturbance, noise, and the displacement of fishing activities. Without a comprehensive evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions cannot be accurately assessed.

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

In summary, the deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies all contribute to

an incomplete and unreliable assessment. These shortcomings hinder a robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is critically deficient and does not encompass the complete range of impacts stemming from a singular integrated project. The onshore works, including cabling across protected moorland and the construction of a substation near Stornoway, are fundamentally linked to the offshore turbines. However, they are evaluated separately, which leads to a fragmented analysis that obscures the overall environmental and socio-economic consequences.

The onshore activities necessitate excavation in regions of deep peat, particularly within Barvas Moor, an area recognised as a significant carbon store and ecologically fragile habitat. The application lacks a thorough assessment of these impacts, inhibiting a full understanding of the project's comprehensive environmental footprint. By omitting or delaying the evaluation of onshore effects, the application restricts a proper appraisal of cumulative consequences. The Environmental Impact Assessment process mandates that all elements of a project be considered collectively, yet the disjointed assessment of offshore and onshore components means that the combined repercussions on peatlands, habitats, and local communities remain inadequately addressed.

Furthermore, there are substantial risks to sensitive habitats, including machair systems and peatland environments, which are protected under policy. The application fails to demonstrate that the impacts on these habitats have been thoroughly assessed or that suitable avoidance measures are in place, highlighting a significant evidential gap in terms of biodiversity protection. Additionally, the disturbance of peatland raises concerns about carbon balance, as releasing stored carbon could result in a carbon debt that contradicts renewable energy development goals. This issue is not sufficiently addressed in the application, nor is there evidence to affirm that the overall carbon balance is favourable.

The routing of infrastructure through active croft land presents potential conflicts with existing land use and legal rights. The application does not provide proof that the necessary consents or procedures have been initiated, casting doubt on the project's deliverability and lawful execution. From a policy standpoint, the failure to evaluate the project in its entirety and to demonstrate the protection of peatlands, habitats, and land use interests contravenes both the National Marine Plan and National Planning Framework 4. The inability to prove that impacts can be avoided or mitigated significantly undermines the application.

In conclusion, the separation of project components, coupled with the absence of a comprehensive assessment and the lack of evidence regarding environmental and land use impacts, renders this segment of the application incomplete and untrustworthy, thus preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is renowned for its exceptionally dark skies, which play a vital role in defining the area's environmental quality, cultural identity, and tourism value. The proposal to install permanent red aviation lighting introduces a visible intrusion that creates a continuous “wall of light” across the western horizon, fundamentally changing the night-time environment. The Environmental Impact Assessment completely omits an evaluation of how this lighting affects visual amenity, landscape character, and the experience of residents and visitors, despite the recognised significance of dark skies to the local identity and burgeoning sectors such as astro-tourism.

Additionally, the application lacks any assessment of impacts on nocturnal wildlife, particularly species that are sensitive to artificial lighting, such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel, which can face disorientation and increased collision risks due to phototaxis. The absence of a lighting impact assessment or phototaxis study means that potential effects on these species and their mortality rates remain unexamined. This issue is exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal activity or the associated risks. Other species like Kittiwakes, which may forage or migrate at night, also face threats from artificial lighting that have not been adequately assessed. The lack of site-specific night-time data leads to a critical gap in understanding the ecological impacts of the proposal.

Without a proper assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would be negatively affected. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and hindering a lawful determination. From a policy standpoint, these omissions contradict National Planning Framework 4 regarding the protection of natural places and environmental quality. Moreover, the broader evaluation of landscape and seascape impacts is compromised, as night-time character is an essential aspect of the environment.

In conclusion, the lack of any assessment of dark skies and nocturnal wildlife creates a significant evidential gap. The failure to provide baseline data, impact modelling, and species-specific analysis renders the application incomplete and unfit to support a lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates a significant failure to meet the criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. This application echoes the main issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Now, despite being assessed under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the proposal remains flawed.

The evidential basis for the application is neither complete nor reliable. Key baseline data is missing, the design envelope is not clearly defined, and unspecified mitigation measures are relied upon. Additionally, essential impact pathways have been overlooked, including those related to nocturnal wildlife, onshore infrastructure, and the effects on tourism. Consequently, the Environmental Impact Assessment is insufficient and fails to provide a comprehensive understanding of likely significant effects or residual impacts.

Procedurally, the application presents serious shortcomings. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018. Furthermore, the incomplete Social Impact Assessment is a significant omission. These gaps hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

In terms of compliance with National Planning Framework 4, the proposal is in direct conflict. It does not adequately protect 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 missing tourism impact modelling. The cumulative effects of both offshore and onshore components have not been thoroughly assessed, leaving the impacts on peatlands, carbon balance, habitats, and crofting land unclear.

Uncertainty surrounds potential environmental risks, which could be significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and often inconsistent. The necessary evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been achieved, thus invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

The proposal threatens to cause substantial and irreversible changes to a sensitive landscape. Industrialisation along the Atlantic-facing coastline, the loss of dark skies,

disruption to cultural and visual connections, and negative impacts on tourism create permanent effects that cannot be mitigated satisfactorily.

In summary, the application is both procedurally and substantively unfit for determination. The extent of information gaps, coupled with policy contradictions and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority should either refuse consent based on these grounds or use appropriate regulatory measures to require the submission of the missing information.

Therefore, 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 243

MD-00011742 & MD-00011743 - Spiorad na Mara Limited - Spiorad na Mara Offshore Wind Farm - Isle of Lewis

I formally object to the above application as it contravenes the following planning policies and guidance:

Lack of Community Engagement: There was no consultation with the communities of west Lewis before Crown Estate Scotland identified and leased the N4 area for development. The plan was imposed on them without consent.

Scotland's National Marine Plan (NMP) GEN 18 'Early and effective engagement should be undertaken with the general public and all interested stakeholders to facilitate planning and consenting processes.'

NMP Para. 4.77 'Engagement with the public and other stakeholders should be appropriate, proportionate and meaningful. It should be undertaken as early as possible in planning and consenting processes,'

NPF4 Spatial Principles - Just Transition. 'We will empower people to shape their places.'

Significant Adverse Impacts on Protected Birdlife and Habitats: The development occupies primary foraging grounds for the Lewis Peatlands SPA red-throated divers, falls within the foraging range of the St Kilda gannet colony, and crosses a principal UK migratory corridor for protected species, including whooper swan and pink-footed goose. The EIAR fails to adequately assess the threats of collision, displacement, and barrier effects to these declining populations. Thus, consent would breach the Conservation (Natural Habitats &c.) Regulations 1994, the 2018 Offshore Regulations, the Marine (Scotland) Act 2010, and the Wildlife and Countryside Act 1981, as the proposal is likely to adversely affect the integrity of the following SPA's: Lewis Peatlands, West Coast of the Outer Hebrides, Seas off St Kilda and St Kilda.

NPF4 Policy 7 l 'Development proposals affecting a World Heritage Site or its setting will only be supported where their Outstanding Universal Value is protected and preserved.'

NPF4 Policy 11 e ix Impact on 'biodiversity including impacts on birds' must be addressed.

Unassessed Onshore Impacts and Breach of Statutory Rights of Crofters: Granting offshore consent while onshore impacts on irreplaceable machair and deep peatland remain unassessed, directly contravenes NPF4 Policy 3, which requires biodiversity (including irreplaceable habitats) to be left in a demonstrably better state. In addition the proposal fails to engage the statutory rights of crofters under the Crofters (Scotland) Act 1993.

NMP Para. 4.77 'There should be a presumption in favour of publicising applications for marine and terrestrial components of a development together during consenting processes.'

Community Opposition and lack of Community Empowerment: The Community Opinion Survey on the Spiorad na Mara Offshore Wind Farm Development (N4) published by www.emg-lewis.co.uk in April 2026 found that 88% of residents from Ness to Uig opposed the N4 development. Approving this project against such overwhelming local consensus would directly contravene the National Islands Plan's commitment to community empowerment.

The National Islands Plan, page 65, para. 5 'Our vision is for islanders to be empowered to shape their own priorities, build their futures, and protect what makes their communities unique.'

My further objection points:

1. The lack of clarity on size (number of) of the windfarm, onshore asset position and also size.
2. Unlike Shetland, where the community have benefited from the oil industry with significant financial investment from that industry to infrastructure and local authority, the residents of the Western Isles appear to be expected to have no benefits whatsoever from the proposed windfarm. This also relates to an apparent lack of enthusiasm from CnES to pursue potential benefits.
3. As the recently retired Executive Medical Director for NHS Western Isles, I am concerned of no mention of impact assessment and requirements from healthcare providers. This includes General Practice, Dental services and also SAS. NHSWI has a significant proportion of locum and FTC employees, with service provision already stretched. The workforce numbers being mentioned cannot be absorbed within the current service, with none of the local GP and Dental Practices having any capacity, and I would suggest appetite, to cope with the healthcare needs. If ignored, this will inevitably overwhelm the Acute Hospital based services. I am unaware of any modelling of this and the potential options generated.
4. I am unaware of modelling assessing the social impact of an increase in population, whether from workers or from their families. Again CnES have been quiet regarding potential impacts on education, police and childcare services.

This planning decision is about the long-term future and the character of a landscape and community that cannot be replaced once altered at this scale. Spiorad na Mara Offshore Wind Farm would cause significant, cumulative and largely irreversible harm to landscape and seascape character, heritage setting, and the tourism economy. I respectfully request that this application is rejected.

Member of Public 244

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 the associated documentation, revealing 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 notable for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

The proposal lacks a solid evidential foundation for a lawful determination. Essential environmental data is absent, with limited and inconsistent baseline information, and several critical aspects of the proposal remain undefined. The application employs a flexible design framework that hinders a clear understanding of the likely significant effects. Moreover, the reliance on unspecified mitigation measures prevents any assessment of their potential effectiveness. Consequently, the documentation fails to facilitate a comprehensive understanding of the impacts on the environment, culture, and community, and assertions of negligible or non-significant effects lack robust evidential support.

The application demonstrates clear policy inconsistencies. It appears misaligned with 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. There is insufficient evidence to prove that the national obligations regarding biodiversity, climate interests, and environmental integrity will be met. These inconsistencies challenge the statutory tests necessary for consent and compromise the competent authority's ability to deem the development acceptable in policy terms.

The unprecedented scale of the proposal raises substantial concerns, with large turbines sited close to the shoreline, resulting in significant implications for landscape capacity, visual dominance, and environmental impact. Collectively, the lack of adequate information, dependence on undefined mitigation strategies, evidential deficiencies, and clear policy non-compliance indicate that the application is incomplete and incapable of sustaining a lawful determination. Under these conditions, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies that undermine its reliability and completeness. A flexible Project Design Envelope is employed, lacking firm commitments to specific turbine dimensions, layouts, or configurations. This introduces substantial uncertainty and hampers the ability to consistently apply a worst-case scenario, which is essential for a credible assessment. Consequently, the impacts detailed may not accurately represent those of the development that would eventually be constructed, limiting both public understanding and the competent authority's ability to grasp the full extent of environmental effects.

Moreover, the application places considerable reliance on yet-to-be-defined mitigation measures, monitoring strategies, and management plans. Seeking consent under these circumstances defers critical information to stages post-consent, making it impossible to evaluate the effectiveness of these measures or assess residual impacts meaningfully. This procedural approach is unacceptable and contradicts the fundamental objectives of the Environmental Impact Assessment regime, which mandates that likely significant effects and appropriate mitigations are clarified before any determination can be made.

Evidential shortcomings also permeate the assessment, with notable gaps in baseline data, methodological limitations, and an over-reliance on assumptions instead of site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, particularly where claims of negligible or non-significant effects lack robust supporting data. Insufficient information precludes a clear understanding of cumulative and worst-case impacts, resulting in scientific uncertainty that fails to meet statutory requirements.

As such, the application does not satisfy the evidential threshold stipulated under the Habitats Regulations, which is necessary to rule out adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not align with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it fails to demonstrate that impacts have been comprehensively assessed or that appropriate safeguards are established.

In summary, the combination of an undefined design envelope, unspecified mitigation measures, and significant gaps in baseline data culminates in an unreliable and incomplete Environmental Impact Assessment Report. These shortcomings inhibit a lawful and rigorous evaluation of environmental effects and leave the competent

authority without the necessary information to make a well-informed determination regarding the application.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment regarding marine ecology and protected species is significantly inadequate, failing to provide a thorough and trustworthy understanding of ecological receptors in the West Lewis coastal environment. This region is characterised by its sensitivity and biological activity, yet the methodologies used lack the ability to fully capture species presence, behaviours, and habitat usage, leading to an incomplete baseline data set. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

Notably, the assessment neglects to adequately identify and evaluate otters, which are classified as a European Protected Species. The application does not recognise their active utilisation of coastal areas for foraging and movement. The failure to consider their core foraging range and behavioural patterns leads to a significant oversight in assessing the potential effects of construction-related disturbances, noise, and increased activity. This omission undermines the conclusions drawn regarding the absence of significant effects on otters.

Additionally, the evaluation of basking sharks is problematic, as it relies heavily on aerial surveys that introduce notable detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence, especially in comparison to established land-based observations that indicate their frequent use of these waters. The failure to integrate or adequately consider such data results in a deficient baseline and diminishes the reliability of the conclusions reached.

Due to these methodological shortcomings, the conclusions asserting negligible or non-significant effects are based on assumptions rather than robust evidence. The lack of adequate baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty about the actual scale of risks to marine species and habitats.

From a regulatory standpoint, the application does not adhere to 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 uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, granting consent cannot be justified under the law.

In summary, the presence of incomplete baseline data, flawed methodologies, and

unsupported conclusions collectively render the assessment unreliable. These inadequacies obstruct a thorough 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 presents an ornithological assessment that is significantly flawed, exhibiting gaps in evidence and inconsistencies that diminish its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already declining. However, the application fails to meet the necessary evidential standards to demonstrate that these species will not be adversely affected. Situated within crucial foraging areas and migratory pathways, the proposed development does not adequately assess the potential impacts of displacement, collision risk, or habitat loss.

A notable contradiction arises within the application, where the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is typically invoked only when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment, suggesting that the conclusions drawn are not substantiated by the supporting evidence. The assessment lacks sufficient information to conclude that seabirds associated with protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. The critical nature of these feeding grounds is not fully recognised, and the reliance on modelling techniques adds a layer of uncertainty, especially for species experiencing severe declines, such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly given incomplete baseline data and a lack of understanding regarding behavioural responses.

Additionally, the placement of turbines within a recognised migratory corridor introduces a significant risk by creating a barrier in 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 within this corridor or the potential impacts on species with small global populations.

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 presence of contradictory findings, combined with data deficiencies and limitations in modelling, means that the standard of beyond reasonable scientific doubt has not been fulfilled. This situation invokes the precautionary principle, thereby obstructing a lawful conclusion in favour of consent. The identified deficiencies also indicate non-compliance with the National Planning Framework 4 concerning

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 deemed unreliable due to its internal contradictions, methodological flaws, and insufficient evidence. These shortcomings impede a thorough evaluation of impacts and lead to the conclusion that the application does not satisfy the statutory requirements needed for determination.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual, seascape, and landscape impacts is significantly lacking and does not adequately account for the extent of change or the sensitivity of the environment. The West Lewis coastline features an open Atlantic horizon, an undeveloped character, and a profound sense of 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 accurately depict the magnitude of visual change. The size and proximity of the turbines would dominate the views from residential areas, historic sites, and popular coastal locations. This would directly affect visual amenity and undermine the defining qualities of naturalness and remoteness. The assessment does not convey the significance of this impact within the context of such a sensitive landscape.

Methodological issues arise in the selection and presentation of visual viewpoints. Evidence suggests that the viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the magnitude of visual impact has been understated, which undermines the reliability of the assessment.

Additionally, the assessment neglects to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are situated within a wider landscape setting connected visually and spatially to the Atlantic horizon. The assessment treats these assets in isolation rather than acknowledging their interdependence, resulting in an incomplete analysis of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, changing how 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 within the application.

From a policy perspective, the proposal is in direct conflict with National Planning Framework 4 regarding the protection of natural places and historic assets. The magnitude of change contradicts 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 assertions of policy compliance.

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 dominant and unavoidable. As a result, the change is fundamental and permanent, rather than reducible to an acceptable level through mitigation.

In summary, the assessment does not accurately represent the scale of impact, the sensitivity of the environment, or the interconnectedness 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 evaluation of construction and pollution risks presented in this application is significantly lacking and fails to deliver the necessary detail for a thorough assessment of potential environmental impacts. Involvement in extensive seabed preparation and installation activities in a high-energy Atlantic setting is proposed, yet there are no well-defined Construction Environmental Management Plans or Pollution Prevention Plans in place. Instead, the application leans on mitigation and contingency strategies that are intended to be formulated after consent has been granted, inhibiting a genuine appraisal of their potential effectiveness or adequacy.

This dependency on unspecified future measures is particularly alarming, considering the delicate nature of the receiving environment. The coastline of West Lewis is home to clean coastal waters and crucial habitats that are sensitive to disturbances from sediment and contamination. Although the application acknowledges risks associated with sediment mobilisation and accidental chemical or oil spills, it fails to provide ample detail on preventative, control, or monitoring strategies.

There is also considerable uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without comprehensive modelling and clearly established management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also encompasses potential effects on marine species and

habitats recognised as sensitive within the broader assessment framework.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent, the application obstructs the ability to evaluate whether adequate safeguards are in place to manage pollution incidents. This creates procedural risks and diminishes the capacity of the competent authority to assess environmental protection measures at the determination stage.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment framework. Significant effects and mitigation must be evaluated before consent can be granted, and in the absence of this information, a lawful determination is unattainable. 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 culminate in a materially deficient assessment. These deficiencies hinder a comprehensive 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 support an active fishing industry. However, the application does not adequately address the ecological or socio-economic impacts of the proposed development. It lacks a robust evaluation and fails to demonstrate how these vital habitats and activities can be protected or maintained without significant disruption.

A crucial concern is the flawed assumption that fishing activities can be displaced without repercussions. The application does not provide evidence that alternative fishing grounds exist, are accessible, or can sustain the additional pressure resulting from displacement. This oversight is critical, as the risk of overfishing in other areas may threaten the local fleet's livelihoods. A clear, evidence-based assessment is necessary to understand the implications for fisheries and the associated economic conditions.

The proposal poses substantial risks to marine species, particularly due to the underwater noise generated during construction. High-energy hammer piling for extended periods is expected to create disturbances over large areas, potentially affecting species such as dolphins. The anticipated disturbance to a significant proportion of the local bottlenose dolphin population raises serious issues, yet the application minimises these impacts without adequate evidence.

There exists an inconsistency within the application, wherein the need for licences to permit harm to European Protected Species is acknowledged, while simultaneously asserting that the impacts are negligible. This contradiction undermines the assessment's credibility and raises significant concerns regarding adherence to the Habitats Regulations, especially when potential harm necessitates legal authorisation.

Furthermore, the assessment inadequately considers the cumulative impacts arising 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 standpoint, the application fails to demonstrate compliance with National Planning Framework 4 or the National Marine Plan. It does not substantiate that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, which hampers any conclusion regarding its sustainability.

In summary, the deficiencies in evidence concerning fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies contribute to an incomplete and unreliable assessment. These shortcomings hinder a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is fundamentally inadequate and does not account for the full range of impacts associated with what constitutes a singular integrated project. The offshore turbines are intrinsically connected to the onshore works, yet they are assessed in isolation, leading to a fragmented understanding that masks the true magnitude of environmental and socio-economic consequences.

The infrastructure onshore encompasses cabling across protected moorland, the construction of a substation near Stornoway, and the necessary access routes through sensitive landscapes. These activities necessitate excavation in areas rich in deep peat, especially within Barvas Moor, which serves as an important carbon store and ecologically sensitive area. The application fails to deliver a thorough assessment of these impacts, which obstructs a complete comprehension of the project's overall environmental footprint.

By neglecting to assess onshore impacts or deferring such evaluations, the application precludes a proper analysis of cumulative effects. The Environmental Impact Assessment process mandates that all project components are examined collectively;

however, the disjointed approach to offshore and onshore elements means that the compounded impacts on peatlands, habitats, and local communities remain inadequately understood.

There are also considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which enjoy policy protection. The application does not confirm that impacts on these habitats have been thoroughly evaluated or that suitable avoidance measures have been established. This results in a significant evidential shortfall regarding the protection of biodiversity.

Moreover, the routing of infrastructure through active croft land presents potential conflicts with pre-existing land use and legal rights. The application lacks evidence that necessary consents or processes have been initiated, raising doubts about the feasibility and lawful execution of the proposal.

From a policy standpoint, the failure to evaluate the project in its entirety and to demonstrate the protection of peatlands, habitats, and land use interests is at odds 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 disconnection of project components, the lack of comprehensive assessments, and the absence of evidence regarding environmental and land use impacts render this segment of the application incomplete and unreliable, hindering a lawful determination.

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

As someone with strong, close family ties to Lewis who has grown up enjoying the island I think this development is abhorrent. I currently live in Ayrshire where the landscape is scarred by wind turbines in every direction you look - this is awful and it should be criminal to do off the beautiful, unspoilt Lewis coastline.

Member of Public 245

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 appropriate marine licensing and Environmental Impact Assessment frameworks. A review of the Environmental Impact Assessment Report and its associated documents reveals significant planning, environmental, cultural, and procedural shortcomings. The development site is situated off the west coast of the Isle of Lewis, an area recognised for its Atlantic-facing coastline, near-pristine conditions, and strong cultural heritage. The nature, scale, and proximity of the proposed development raise serious concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis for a lawful determination. It is evident that crucial environmental data is absent, baseline information is both limited and inconsistent, and several vital aspects of the proposal remain undefined. The flexible design framework employed inhibits a clear assessment of potential significant effects, while the reliance on unspecified mitigation measures raises concerns about their potential effectiveness. Consequently, the documentation does not facilitate a comprehensive understanding of environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsubstantiated by reliable evidence.

There are distinct and significant policy inconsistencies present. The proposal appears at odds with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly regarding biodiversity, natural environments, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national mandates to safeguard biodiversity, climate interests, and environmental integrity. These discrepancies directly affect the statutory tests necessary for consent and jeopardise the competent authority's ability to deem the development acceptable from a policy standpoint.

The unprecedented scale of the project is concerning, with large turbines positioned in close proximity to the shore, leading to significant worries about landscape capacity, visual impact, and environmental effects. Collectively, the deficiencies in information, reliance on undefined mitigation strategies, evidential gaps, and clear policy violations illustrate that the application is incomplete and fails to support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary completeness and transparency to reliably convey the likely environmental effects of the proposed development. The reliance on a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty. This uncertainty undermines the assessment's integrity and hinders a consistent application of a worst-case scenario, thereby obscuring the true extent of potential environmental impacts from both the public and the competent authority.

Moreover, the application is heavily dependent on unspecified mitigation measures, monitoring strategies, and management plans, which have yet to be defined. Seeking consent under these circumstances, with the intention to address environmental harm at a later stage, impedes a meaningful evaluation of the effectiveness of these measures and hinders the assessment of any residual impacts. This deferral of critical information to post-consent phases is procedurally improper and contradicts the fundamental purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation strategies be clearly established prior to determination.

There are also notable evidential shortcomings, such as gaps in baseline data, limitations in the employed methodology, and an overreliance on assumptions rather than site-specific evidence. This situation leads to uncertainty about the scale and significance of impacts, especially where negligible or non-significant effects are claimed without adequate supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that is incompatible with statutory requirements.

As a result, 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 fails to demonstrate adherence to the National Planning Framework 4, including obligations related to biodiversity protection and environmental integrity, as it cannot be confirmed that impacts have been thoroughly assessed or that adequate safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specified mitigation measures, and the deficiencies in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings prevent a lawful and rigorous assessment 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 within the West Lewis coastal environment is substantially inadequate. This area is characterised as a biologically active marine system, yet the baseline data provided is incomplete. The methodologies employed do not effectively capture the presence, behaviour, and habitat use of relevant species. Consequently, the assessment lacks a reliable evidential basis necessary for evaluating potential impacts.

A significant gap exists concerning otters, a species protected under European law, where their active utilisation of coastal areas for foraging and movement has not been adequately acknowledged or assessed. The failure to consider their core foraging range and behavioural patterns leads to an insufficient evaluation of the potential impacts stemming from construction activities, noise, and increased human activity. Such omissions compromise the conclusions regarding the absence of significant effects on the otter population.

Further issues emerge in the evaluation of basking sharks, as the reliance on aerial surveys introduces a considerable detection bias, particularly given the conditions prevalent in the Atlantic. This methodology is likely to result in an underestimation of their presence, especially in light of established land-based observations that indicate frequent use of these waters. Neglecting to incorporate or adequately consider this data contributes to an incomplete baseline and diminishes the credibility of the assessment's conclusions.

These methodological deficiencies mean that the conclusions asserting negligible or non-significant effects are founded on assumptions rather than solid evidence. Additionally, the lack of comprehensive baseline data inhibits a meaningful assessment of cumulative and indirect impacts, including variations across seasons and broader ecosystem interactions. This creates uncertainty regarding the actual risks posed to marine species and their habitats.

From a regulatory standpoint, the application does not satisfy the stipulations of the Environmental Impact Assessment framework and the National Planning Framework 4, as it fails to properly identify or assess the protected species involved. The uncertainty generated by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it is not lawful to grant consent.

In conclusion, the assessment's reliability is fundamentally undermined by incomplete baseline data, flawed methodologies, and unsupported conclusions. These issues hinder a thorough evaluation of impacts on marine ecology and protected species, collectively suggesting that the application lacks a robust evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application for the development is fundamentally flawed and cannot be relied upon. It presents significant gaps in evidence and contains internal inconsistencies that undermine its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, which are already in decline. However, the application fails to sufficiently demonstrate that these species will not be adversely affected. This development is situated within key foraging areas and migratory pathways, yet the implications of displacement, collision risk, and habitat loss have not been adequately evaluated.

The application contains a notable contradiction; while the developer concludes that there are no significant adverse effects, they also put forward a Habitats Regulations derogation case. This is only necessary when significant harm is expected, which raises serious questions about the reliability of the assessment. Furthermore, there is inadequate evidence to support the claim that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is not fully recognised, and reliance on modelling approaches introduces further uncertainty, particularly for species facing severe decline, like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, especially considering that baseline data is incomplete and behavioural responses remain inadequately understood.

The location of turbines within a recognised migratory corridor poses an additional and significant risk, effectively creating a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term implications of sustained mortality within this corridor or consider the potential effects on species that have relatively small 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, alongside data gaps and modelling limitations, indicates that the required standard of beyond reasonable scientific doubt has not been achieved. This engages the precautionary principle, thus precluding a lawful conclusion in support of consent. Moreover, the identified deficiencies 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 places the proposal in direct conflict with national policy.

Overall, the assessment is unreliable due to these internal inconsistencies, methodological weaknesses, and insufficient evidence. These shortcomings hinder a robust evaluation of impacts and lead to the conclusion that the application does not meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline embodies a living cultural landscape where environment, language, tradition, and community are deeply intertwined. However, the assessment of cultural heritage and community identity within the application is fundamentally inadequate. It adopts a reductive perspective, viewing heritage merely as a collection of isolated, static assets rather than recognising their ongoing social, cultural, and spiritual relevance within the community.

Particularly concerning is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active places of burial and spiritual practice. Despite their continued use and significance, the assessment categorises them as static features, neglecting their ongoing meaning and the potential impact of development on their setting. This mischaracterisation leads to an incomplete evaluation of cultural effects and dismisses their integral role in community life.

The assessment also fails to account for intangible cultural heritage, including the Gaelic language, traditions, and the community's longstanding relationship with the coastal environment. These elements are vital to the area's identity yet are conspicuously absent from the evaluation, representing a significant oversight. Ignoring these factors means that the true cultural impact of the development cannot be accurately assessed.

There are additional issues regarding community rights and engagement. The Gaelic-speaking population, which possesses a distinct cultural identity recognised as that of an Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement diminishes the legitimacy of the assessment and ignores established principles of participation in decisions that affect cultural and environmental interests.

Moreover, the absence of a compliant Island Communities Impact Assessment, required under the Islands (Scotland) Act 2018, highlights a critical procedural failure.

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 oversight alone hinders a lawful determination.

From a policy standpoint, these shortcomings place the proposal in direct conflict with National Planning Framework 4, particularly regarding the protection of historic assets and places. The neglect to consider both tangible and intangible heritage, alongside the failure to recognise 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 appropriately evaluated, and the application lacks a sufficient basis for determining the true cultural cost of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal's assessment of visual, seascape, and landscape impacts is severely lacking, failing to capture both the extent of change and the sensitivity of the environment. The West Lewis coastline is characterised by its unspoilt Atlantic horizon, which contributes to its undeveloped nature and profound sense of remoteness. The planned installation of large-scale turbines near the shoreline would result in a continuous industrial presence that would fundamentally change this character, leading to a permanent and irreversible transformation of the landscape.

The application inadequately addresses the magnitude of visual change that would occur. Due to their scale and proximity, the turbines would overpower views from residential areas, historic sites, and popular coastal locations, thus directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. This significant impact has not been properly conveyed, which is particularly concerning given the sensitivity of the landscape in question.

Methodological issues are evident in the selection and presentation of visual viewpoints. There is evidence indicating that these viewpoints may not adequately reflect the most sensitive receptors or potential worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the risk of underestimating the visual impact, thereby compromising the assessment's reliability.

Additionally, the assessment neglects to consider the interconnectedness of the landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments are linked to the broader landscape by visual

and spatial relationships with the Atlantic horizon. The evaluation incorrectly treats these assets as isolated, failing to recognise their interdependence, which results in an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape threatens to sever these vital connections, altering the context in which heritage assets are experienced and disrupting their relationship to the natural horizon. This signifies not only a visual impact but also a broader cultural and spatial detriment that has not been thoroughly assessed within the application.

From a policy standpoint, the proposal directly contravenes the National Planning Framework 4 regarding the safeguarding of natural places and historic assets. The anticipated scale of change is incompatible with the mandate to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case scenario assessment further weakens any assertions of policy compliance.

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

In conclusion, the assessment is inadequate in representing the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These deficiencies hinder a reliable evaluation and reinforce the position that the proposal is incompatible with the preservation of this landscape.

FISHERIES AND MARINE LIFE

The lack of a thorough assessment regarding fisheries and marine life is a fundamental concern, as it does not adequately evaluate the ecological or socio-economic impacts. The application fails to provide evidence that it can protect or maintain the diverse marine ecosystem and the active fishing industry located off the West Lewis coast, which are at risk of significant disruption.

One critical issue is the assumption that fishing activities can simply be displaced without consequence. The application does not demonstrate that there are alternative fishing grounds available, accessible, or capable of handling additional pressure. This lack of evidence is crucial, as it opens the door to risks of overfishing in other areas, which could have broader economic repercussions for the local fishing fleet. Without a well-supported assessment, the impacts on fisheries and local livelihoods remain unclear.

The proposal poses considerable risks to marine species, particularly due to underwater noise generated during construction activities. Prolonged high-energy hammer piling is expected to cause disturbances over extensive areas, negatively impacting species such as dolphins. The predicted effects on a significant portion of the local bottlenose dolphin population are alarming; however, the application minimises these serious concerns without adequate supporting evidence.

Moreover, there is a notable inconsistency in the application regarding the need for licenses to permit harm to European Protected Species, while simultaneously claiming that such impacts are negligible. This contradiction calls into question the credibility of the assessment and raises issues concerning compliance with the Habitats Regulations, especially given that harm is anticipated to a level that requires legal authorisation.

Additionally, the assessment overlooks the cumulative impacts resulting from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a comprehensive evaluation of these combined effects, it is impossible to determine the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 or the National Marine Plan. It has not established that the development can coexist with current marine users or that it can avoid unacceptable impacts on marine biodiversity, thus hindering any conclusions regarding its sustainability.

In summary, the deficiencies in the evidence concerning fishing displacement, the underestimation of acoustic impacts, and the internal contradictions within the assessment render it incomplete and unreliable. These shortcomings obstruct a proper evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is incomplete and does not consider the full extent of impacts from what is a single integrated project. The offshore turbines and onshore works are linked and should be assessed together; however, they are currently evaluated separately, which obscures the true scale of environmental and socio-economic effects.

The onshore works include the installation of cabling across protected moorland, construction of a substation near Stornoway, and related access infrastructure through

sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which is an important carbon store and an ecologically sensitive habitat. The application fails to provide a thorough assessment of these impacts, thus hindering a complete understanding of the project's overall environmental footprint.

By omitting or postponing the assessment of onshore impacts, the application prevents a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project are considered together. The current separation of the offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities are not adequately understood.

Furthermore, there are significant risks to sensitive habitats, including machair systems and peatland environments, which are protected by policy. The application does not demonstrate that impacts on these habitats have been fully evaluated or that suitable avoidance measures have been implemented. This results in a clear evidential gap regarding biodiversity protection.

Concerns also arise regarding carbon balance; the disturbance of peatland releases stored carbon, potentially resulting in a carbon debt that contradicts the goals of renewable energy development. The application does not sufficiently address this issue or show that the overall carbon balance remains advantageous.

Additionally, routing infrastructure through active croft land may create conflicts with existing land use and legal rights. The application lacks evidence that the required consents or processes have been initiated, casting doubt on its deliverability and lawful implementation.

From a policy standpoint, the failure to assess the project comprehensively and demonstrate the protection of peatlands, habitats, and land use interests contradicts 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 comprehensive assessment, and the lack of evidence regarding environmental and land use impacts render this part of the application incomplete and unreliable, thus preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is notable for its exceptionally dark skies, which contribute significantly to the area's environmental quality, cultural identity, and tourism value.

However, the assessment of dark skies and nocturnal wildlife is entirely missing from the Environmental Impact Assessment, representing a material omission. The proposal introduces permanent red aviation lighting that is visible over long distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

The application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This lack of assessment is particularly concerning given the importance of dark skies to the area's identity and the growth of emerging tourism sectors, such as astro-tourism. Such omissions create significant gaps in the overall landscape and environmental assessment.

Furthermore, there is no evaluation of 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 phototaxis, which may cause disorientation and increase the risk of collision. The application does not provide a lighting impact assessment or a phototaxis study, thereby neglecting to assess how the aviation lighting could affect these species or potentially increase mortality rates.

The reliance on daytime survey data within the ornithological assessment further compounds this oversight, as it does not account for nocturnal activity or associated risks. Kittiwakes, for instance, may forage or migrate at night and are also vulnerable to disorientation from artificial lighting; yet, this risk remains unassessed. The absence of site-specific night-time data creates a critical gap in understanding ecological impacts.

In the absence of an evaluation of nocturnal impacts, it becomes impossible to ascertain whether protected species or designated sites would suffer adverse effects. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, which invokes the precautionary principle and prevents a lawful determination.

From a policy standpoint, this omission conflicts with National Planning Framework 4 concerning the protection of natural places and environmental quality. It also undermines the broader assessment of landscape and seascape impacts since night-time character is an integral aspect of the environment.

Overall, the lack of any assessment of dark skies and nocturnal wildlife constitutes a substantial 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 application for the Spiorad na Mara Offshore Wind Farm represents a failure to meet the standards of sustainable development. This proposal does not address the statutory duties, national policy, or evidential standards required. It echoes the issues from the 2008 refusal of the Lewis Wind Power proposal, as the industrial scale remains unacceptable. Although the current application falls under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it still lacks necessary support.

Significant gaps in baseline data are evident, alongside the use of an undefined design envelope. There is an overreliance on unspecified mitigation measures, and essential impact pathways are omitted. This includes nocturnal wildlife, full onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of likely significant effects or residual impacts.

Procedural failures are present as well. The lack of a compliant Island Communities Impact Assessment is a breach of the Islands (Scotland) Act 2018. Furthermore, not disclosing the full Social Impact Assessment is a material omission. Such deficiencies hinder the competent authority from evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for consideration.

Additionally, the proposal conflicts with National Planning Framework 4. It does not sufficiently protect biodiversity, natural places, or cultural heritage. There is a lack of evidence showing that health and wellbeing impacts are acceptable, and it fails to demonstrate a net economic benefit, particularly due to the absence of tourism impact modelling. The cumulative impacts from offshore and onshore components have not been accurately assessed, leaving the effects on peatlands, carbon balance, habitats, and crofting land unclear.

Environmental risks associated with the proposal remain uncertain and potentially significant. The assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The evidential threshold needed to rule out adverse effects has not been achieved, invoking the precautionary principle and hindering lawful conclusions regarding acceptable impacts.

The proposal will 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 effects on tourism

represent permanent changes that cannot be mitigated adequately.

Considering these issues, the application is procedurally and substantively unfit for determination. The combination of information deficiencies, policy conflicts, and unresolved environmental risks prevents a lawful and evidence-based decision. The competent authority should either refuse consent on these grounds or exercise regulatory provisions to demand 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

Wind turbines have a limited lifespan. After that, the materials used cannot be recycled. Apart from that, they will be closed down due to high winds. Why they would be set up in an area known for high wind and gales is beyond me.

The proposed wind farm will have a negative effect on the fragile environment, marine ecology, and many other aspects, as already listed.

Member of Public 246

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 marine licensing and Environmental Impact Assessment frameworks. It is informed by a thorough review of the Environmental Impact Assessment Report and related documentation, highlighting significant planning, environmental, cultural, and procedural deficiencies. The proposed development is situated off the west side of the Isle of Lewis, a region characterised by its Atlantic-facing coastline, relatively unspoiled environment, and rich cultural heritage. The scale and design of this proposal, along with its proximity to the shoreline, raise serious questions regarding its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential foundation for lawful determination. There are critical gaps in environmental data, with baseline information being both limited and inconsistent, while significant aspects of the proposal remain undefined. The adoption of a flexible design framework obscures the understanding of potential significant effects, and the reliance on unspecified mitigation measures renders it impossible to evaluate their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidential support.

Moreover, there are evident and significant conflicts with policy. The proposal does not appear to comply 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 and wellbeing. It does not prove that it can fulfil national obligations to safeguard biodiversity, climate interests, and environmental integrity. These inconsistencies directly undermine the statutory tests necessary for consent and compromise the ability of the competent authority to deem the development acceptable within policy frameworks.

The unprecedented scale of the proposal in this area, with large turbines situated close to the shoreline, raises major concerns about landscape capacity, visual impact, and overall environmental implications. The combination of inadequate information, reliance on undefined mitigation strategies, evidential shortcomings, and clear non-compliance with policy illustrates that the application is incomplete and fails to support

a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

MARINE ECOLOGY AND PROTECTED SPECIES

The West Lewis coastal environment is a highly sensitive and biologically active marine system. The assessment of marine ecology and protected species fails to provide a complete or 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 lacks a solid evidential basis for evaluating potential impacts.

A significant omission is the failure to properly recognise and assess otters, a European Protected Species, which actively use coastal areas for foraging and movement. The application does not adequately consider their core foraging range and behavioural patterns. This oversight means that the potential effects of construction disturbance, noise, and increased activity have not been sufficiently assessed, undermining any conclusions about the absence of significant effects on otters.

Further shortcomings exist in the assessment of basking sharks. The reliance on aerial surveys introduces substantial 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 frequent use of these waters. The failure to incorporate or properly consider such data results in an incomplete baseline and diminishes the reliability of the conclusions.

These methodological limitations mean that conclusions of negligible or non-significant effects are based on assumptions rather than solid evidence. The lack of sufficient baseline data also hinders the meaningful assessment of cumulative and indirect impacts, including seasonal variation and wider ecosystem interactions. This creates uncertainty regarding the actual scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not meet the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it does not properly identify or assess protected species. The uncertainty introduced 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 assessment is rendered unreliable due to incomplete baseline data, flawed methodologies, and unsupported conclusions. These deficiencies impede a

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline must be recognised as a living cultural landscape, where environment, language, tradition, and community are closely intertwined.

Unfortunately, the assessment provided in the application is fundamentally inadequate, as it adopts a reductive approach that treats cultural heritage as isolated, static assets rather than acknowledging their ongoing social, cultural, and spiritual functions within the community.

Particularly concerning is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are active places of burial and spiritual practice, yet they have been mischaracterised as static features in the assessment. This failure to acknowledge their continued use and the impact of development on their setting leads to an incomplete evaluation of cultural effects and disregards their vital role in community life.

Moreover, the assessment neglects intangible cultural heritage elements, including the Gaelic language, traditions, and the longstanding relationship between the community and the coastal environment. These factors are central to the area's identity, yet they are entirely absent from the assessment, representing a significant omission that impedes a proper understanding of the cultural impact of the development.

There are also serious concerns regarding community rights and engagement. The Gaelic-speaking population, characterised as an Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the legitimacy of the assessment and fails to reflect the established principles of participation in decisions that affect cultural and environmental interests.

A critical procedural failure is the lack of a compliant Island Communities Impact Assessment, which is a statutory requirement 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, making it impossible to make a lawful determination.

From a policy standpoint, these deficiencies 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, as well as to recognise living cultural practices, represents a clear departure from policy

requirements.

In conclusion, the failure to assess 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 adequately assessed, and the application does not provide a sufficient basis for evaluating the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The submission of the application is critically flawed due to the incomplete assessment of social impacts, health, and wellbeing, which lacks the necessary transparency for a lawful evaluation. Although the developer undertook a Social Impact Assessment that included focus groups with local residents, the absence of the full report creates a substantial evidential gap. This gap restricts both public insight and the competent authority's ability to grasp the full range of social risks identified through the developer's own research.

Evidence suggests that residents are already facing measurable stress, anxiety, and concern directly linked to the scale and proximity of the proposed development. These impacts, resulting from direct engagement with the community, are not mere speculation. Nevertheless, the failure to disclose the complete assessment hampers thorough scrutiny of the findings and limits the capacity to evaluate their significance in the decision-making process.

Moreover, the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's own findings. Despite this recognition, these serious impacts have not been adequately incorporated into the primary application nor 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 also undermines the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health consequences is vital for projects of this magnitude, particularly when community character and functionality are at stake. The failure to provide the comprehensive dataset means the application does not offer a complete evidential basis for weighing the benefits against potential harm.

From a policy standpoint, the application does not illustrate compliance with National Planning Framework 4 regarding health and wellbeing. Developments must promote positive health outcomes and mitigate harm; however, the available evidence indicates pre-existing adverse effects that remain undisclosed. Without the full assessment,

adherence to this policy cannot be established.

The procedural consequences of these omissions are considerable. The competent authority is unable to 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 signifies a failure to meet the evidential standards required by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, together with evidence of current adverse impacts, culminates in an incomplete and unreliable assessment. This situation obstructs a lawful determination and reinforces the view that the application is unsupported by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts on the seascape, landscape, and cultural heritage is inadequate and does not accurately portray the scale of change or the sensitivity of the environment. The coastline of West Lewis, characterised by its expansive Atlantic horizon and undeveloped landscape, embodies a profound sense of remoteness. The proposed installation of large turbines near the shoreline would impose a dominant industrial presence that would irreversibly alter this character, resulting in a permanent transformation of the landscape.

Moreover, the application does not sufficiently convey the extent of this visual change. The size and closeness of the turbines would overwhelm views from residential areas, historic sites, and popular coastal locations, thus diminishing visual amenity and compromising the inherent qualities of naturalness and remoteness. The assessment inadequately reflects this impact and overlooks its significance within such a delicate landscape.

Concerns also arise regarding the selection of visual viewpoints, which may not fully encompass the most sensitive receptors or worst-case scenarios, especially regarding important cultural heritage sites and high-value landscapes. This suggests a potential understatement of the visual impact, calling into question the reliability of the assessment itself.

Additionally, there is a lack of analysis concerning the interconnectedness of the landscape, seascape, and cultural heritage. Heritage sites like the Calanais Standing Stones and other Scheduled Monuments are integral to the wider landscape, linked by visual and spatial relationships to the Atlantic horizon. Treating these sites as isolated entities disregards their interdependence, leading to an incomplete assessment of impacts on their setting and cultural importance.

The proposed industrialisation of the seascape threatens to sever these relationships, altering how heritage assets are perceived and disrupting their connection to the natural horizon. This results in not just a visual impact, but a deeper cultural and spatial harm that the application fails to adequately consider.

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

Furthermore, the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelmingly dominant and unavoidable. Consequently, the change would be fundamental and permanent, rather than 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 interconnectedness of landscape and heritage. These shortcomings hinder a trustworthy evaluation, reinforcing the conclusion that the proposal is fundamentally incompatible with the preservation 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. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans, as the application depends on mitigation and contingency measures that will be prepared after consent. This reliance on undefined future measures raises concerns, especially given the sensitivity of the receiving environment. The West Lewis coastline has clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination.

The application notes risks such as sediment mobilisation and accidental chemical or oil spills but does not adequately detail how these risks will be prevented, controlled, or monitored. Additionally, 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 ascertain the extent, duration, or ecological effects of these impacts, including the potential effects on sensitive marine species and habitats.

Furthermore, the absence of detailed emergency response procedures adds to these issues. By postponing contingency planning until after consent, the application limits the evaluation of whether adequate safeguards are in place to manage pollution events. This approach introduces procedural risk and undermines the competent authority's ability to assess environmental protection measures at the determination stage.

From a regulatory standpoint, the deferral of critical environmental safeguards goes against the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be evaluated before consent, and the absence of such information means a lawful determination cannot be achieved. The application does not demonstrate compliance with the policy requirements concerning environmental protection and water quality. Overall, the lack of defined mitigation measures, insufficient detailed management plans, and uncertainty about potential impacts make the assessment materially deficient. These issues hinder a thorough evaluation of construction and pollution risks and indicate that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal presents significant shortcomings in its assessment of marine life and fisheries, leading to an incomplete understanding of ecological and socio-economic implications. The waters off the West Lewis coast are known for both their rich marine ecosystem and an active fishing industry. However, the application fails to adequately demonstrate that these essential uses and habitats will be safeguarded against substantial disruption.

A critical concern arises from the unfounded assumption that fishing activities can be relocated without adverse effects. There is no evidence provided that alternative fishing grounds exist or can support the increased pressure that displacement would entail. This lack of information is crucial, as such displacement poses a risk of overfishing in other areas and could have broader economic repercussions for the local fishing fleet. Without a thorough, evidence-based assessment, the potential impacts 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 high-energy hammer piling expected over an extended period is likely to disturb a wide area, negatively affecting species such as dolphins. The anticipated disturbance to a considerable portion of the local bottlenose dolphin population raises substantial concerns, yet the application seems to minimise these impacts without adequate supporting data.

Additionally, the application demonstrates a notable inconsistency in its acknowledgment of the need for licences to permit harm to European Protected

Species while simultaneously claiming that these impacts are negligible. This contradiction undermines the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially in situations where harm is expected to necessitate legal authorisation.

The failure to consider cumulative impacts from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities, further complicates the assessment. 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 does not satisfy the requirements set forth in the National Planning Framework 4 or the National Marine Plan. It does not establish that the development can coexist with current marine users or avert unacceptable impacts on marine biodiversity, hindering any conclusion that the proposal aligns with sustainable development principles.

In summary, the deficiencies in the evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal contradictions within the application render the assessment incomplete and unreliable. These issues obstruct a comprehensive evaluation of the potential impacts on marine life and fisheries.

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.

Member of Public 247

Objection To Spiorad na Mara Offshore Wind Farm

References: MD-00011742 & MD-00011743

Dear Sir/Madam

This letter formally objects to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from an analysis of the Environmental Impact Assessment Report and associated documents, revealing significant deficiencies in planning, environmental matters, cultural aspects, and procedural compliance. 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 strong cultural identity. There are serious concerns about how the scale, design, and location of this project align with statutory requirements, national policy, and sustainable development principles.

The application lacks a solid evidential foundation necessary for a lawful decision. Key environmental data is absent, baseline information is inconsistent and limited, and various elements of the proposal remain unclear. The reliance on a flexible design framework complicates the assessment of likely significant effects. Furthermore, the proposed mitigation measures have not been clearly defined, making it impossible to evaluate 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 strong evidence.

There are evident policy inconsistencies with national frameworks. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment framework, or National Planning Framework 4, especially concerning biodiversity, cultural heritage, natural places, and health and wellbeing. It does not demonstrate compliance with national obligations to safeguard biodiversity and environmental integrity. These inconsistencies challenge the statutory tests required for consent, compromising the competent authority's ability to deem the development acceptable from a policy perspective.

The size of the proposal is unprecedented for this area, with large turbines situated near the shoreline, which raises substantial concerns about landscape capacity, visual impact, and environmental consequences. In light of the insufficient information provided, the dependence on undefined mitigation strategies, evidential shortcomings, and clear policy conflicts, it is evident that the application is incomplete and cannot

support a lawful determination. Therefore, the precautionary principle must be applied in this case.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a comprehensive, transparent, or reliable evaluation of the potential environmental impacts associated with the proposal. The introduction of a flexible Project Design Envelope, lacking a commitment to specific turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This ambiguity hinders a consistent application of a worst-case scenario, thereby compromising the integrity of the assessment. As a result, the impacts detailed may not accurately represent the development that is ultimately realised, obstructing both public understanding and that of the competent authority regarding the true extent of environmental consequences.

Furthermore, the application places substantial reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent based on the premise that any environmental harm will be rectified at a later stage precludes a meaningful evaluation of the effectiveness of such measures or an assessment of residual impacts. This postponement of critical information to post-consent phases is procedurally inappropriate and contradicts the core objectives of the Environmental Impact Assessment framework, which mandates that likely significant effects and mitigations be clearly established before a determination is made.

There exist notable evidential deficiencies as well, encompassing gaps in 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, particularly when conclusions regarding negligible or non-significant effects are offered without solid supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that is incompatible with statutory requirements.

Consequently, the application does not meet the evidential threshold mandated by the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This necessitates the precautionary principle's application, especially regarding protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it cannot be established that impacts have been comprehensively assessed or that appropriate safeguards are present.

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

mitigation measures, and the presence of gaps in baseline data render 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 a determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application fails to adequately assess alternatives in accordance with the statutory requirements of the Environmental Impact Assessment regime. Instead of providing a structured and reasoned comparison of realistic alternatives based on environmental impacts, it presents a narrative of project evolution. This approach does not demonstrate that less harmful options have been identified, assessed, and preferred over more damaging solutions.

There is a lack of transparent, evidence-based comparisons of alternative offshore locations, development scales, and design configurations. Specifically, the application does not show that the developer has genuinely considered placing turbines further offshore, where potential visual, ecological, and coastal impacts could be lessened. The sensitivity of the West Lewis coastline and the critical nature of proximity to shore in determining impact makes the absence of this analysis significant, preventing any determination that the proposed siting is the least damaging option.

Furthermore, the inadequacies extend to the assessment of cable routing and landfall, where there is insufficient evidence that alternative routes have been explored to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant sites such as Barvas Cemetery. The lack of a clear avoidance strategy, combined with the absence of comparative analysis, indicates that mitigation by design has not been employed. Instead, the application relies 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 failure to adhere to the established mitigation hierarchy prevents the competent authority from determining whether less harmful and more suitable alternatives are available. Without a comprehensive assessment of alternatives, it cannot be concluded that the proposal is sustainable or compliant with policy.

From a policy standpoint, this shortcoming undermines adherence to 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 overall finding that the application has not been sufficiently evaluated and cannot support a lawful decision.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is inadequate and fails to provide a comprehensive understanding of ecological receptors in the West Lewis coastal environment. This area is sensitive and biologically active, yet the baseline data is incomplete, and the methodologies used do not sufficiently capture the presence, behaviour, and habitat use of species. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

One major oversight concerns otters, which are a European Protected Species. The application does not appropriately recognise or assess their active use of coastal regions for foraging and movement. The failure to consider their core foraging range and behavioural patterns means the possible impacts of construction disturbance, noise, and increased activity have not been adequately evaluated. This significantly weakens any conclusions drawn about the absence of significant effects on this species.

There are also serious shortcomings in the assessment of basking sharks. Relying on aerial surveys introduces a significant detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence, especially when compared to established land-based observations that indicate frequent use of these waters. The neglect to incorporate or properly consider such relevant data leads to an incomplete baseline and undermines the reliability of the conclusions presented.

These methodological flaws mean that the conclusions of negligible or non-significant effects are based more on assumptions than on 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 results in uncertainty regarding the true extent of risk to marine species and habitats.

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

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These shortcomings prevent a thorough 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 assessment of the proposed development is significantly flawed and lacks the necessary evidence to support its conclusions. The west coast of the Isle of Lewis is home to internationally significant seabird populations, many of which are already experiencing declines. However, the application fails to provide adequate proof that these species will not be adversely affected by the proposed project. The location of the development falls within critical foraging areas and migratory pathways, yet the assessment does not thoroughly examine the potential risks of displacement, collision, or habitat loss.

There is a notable contradiction within the application itself, as the developer asserts that there are no significant adverse effects while simultaneously putting forth a Habitats Regulations derogation case, which suggests that significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment, indicating that its conclusions lack solid support from the underlying evidence. Furthermore, the assessment does not convincingly demonstrate that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds has not been comprehensively considered, and reliance on modelling approaches introduces uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, especially given the inadequacies in baseline data and the incomplete understanding of behavioural responses.

The siting of turbines within a recognised migratory corridor adds a substantial risk, creating a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application fails to adequately assess the long-term effects of sustained mortality in this corridor or the potential impact on species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential standards necessary to determine that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been reached. This engages the precautionary principle and renders any conclusion in support of consent unlawful.

Moreover, the identified deficiencies reflect 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 face adverse effects places the proposal at odds with national policy.

In summary, the assessment is deemed unreliable due to its internal inconsistencies, methodological deficiencies, and insufficient evidence. These shortcomings hinder a thorough evaluation of potential impacts and ultimately support the conclusion that the application does not meet the statutory requirements 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 lack of transparency surrounding the Social Impact Assessment is a critical issue, as the full report commissioned by the developer remains unpublished. This absence of information creates a significant evidential gap, which hinders both public understanding and the competent authority's ability to grasp the full scope of social risks identified through the developer's own research. Available summaries reveal that local residents are already experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts stem from direct engagement with the community and are not merely speculative; nonetheless, 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, there is substantial evidence indicating that the proposal threatens community identity and cohesion, with findings from the developer acknowledging "cultural loss." Despite these concerns, such impacts have not been adequately incorporated into the main application or appropriately considered. The failure to disclose the full Social Impact Assessment obscures the true human and social costs associated with the development.

This deficiency in transparency also undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health impacts is essential for developments of this magnitude, especially when community character and functioning may be at stake. The incomplete dataset provided by the application fails to establish a proper evidential foundation for evaluating the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. It is essential that development supports positive health outcomes and mitigates harm; however, the evidence available suggests the existence of adverse effects that have not been fully disclosed. Consequently, without the full assessment, compliance with this policy cannot be substantiated.

The procedural ramifications of this situation are considerable. The competent authority cannot conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment, representing a material omission within the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal for large-scale turbines in close proximity to the West Lewis coastline threatens to fundamentally alter the area's character, which is defined by its open Atlantic horizon and a strong sense of remoteness. This industrial presence would result in a permanent and irreversible transformation of the landscape. The assessment of seascape, landscape, and visual impacts is materially deficient, as it does not adequately reflect the scale of change or the sensitivity of the receiving environment.

Visual impacts are understated, as the application fails to fully capture the magnitude of the visual change. The size and location of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and eroding the qualities that define naturalness and remoteness. Moreover, the assessment does not effectively convey the significance of these impacts within the context of such a sensitive landscape.

Methodological concerns arise from the selection and presentation of visual viewpoints, which may not adequately reflect the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This oversight risks underestimating the visual impact, thereby undermining the reliability of the assessment.

The interconnected relationship between landscape, seascape, and cultural heritage has not been sufficiently assessed. Significant sites, such as the Calanais Standing

Stones and other Scheduled Monuments, are part of a wider landscape setting that relies on visual and spatial relationships with the Atlantic horizon. By treating these sites as isolated assets, the assessment fails to acknowledge their interdependence, resulting in 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 disconnecting them from the natural horizon. This not only represents a visual impact but also leads to broader cultural and spatial harm that the application has not properly assessed.

From a policy standpoint, the proposal conflicts with National Planning Framework 4, particularly regarding the protection of natural places and historic assets. The anticipated scale of change is inconsistent with the need to safeguard landscape character, visual amenity, and the settings of culturally significant sites. Furthermore, the absence of a robust worst-case assessment diminishes any claim of compliance with policy.

The impacts identified cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. As a result, the change is fundamental and permanent, not something that can be reduced to an acceptable level through mitigation efforts.

Overall, the assessment inadequately represents the extent of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These deficiencies hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application is materially deficient due to the absence of defined mitigation measures and the lack of detailed management plans. There is an incomplete assessment of construction and pollution risks, which does not provide the necessary detail to evaluate likely environmental effects. The proposal includes substantial seabed preparation and installation works within a high-energy Atlantic environment; however, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on undefined mitigation and contingency measures that will only be prepared post-consent, which inhibits any meaningful assessment of their adequacy or effectiveness.

This reliance on future measures raises significant concerns, particularly because of the sensitivity of the receiving environment. The West Lewis coastline is home to clean

coastal waters and crucial habitats, which are vulnerable to disturbances from sediment and potential contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it does not adequately detail how these risks will be prevented, controlled, or monitored.

Uncertainty also exists regarding the scale and behaviour of sediment plumes that will arise from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it remains impossible to determine the extent, duration, or ecological effects of these impacts. This uncertainty extends to potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment.

Further complicating these issues is the absence of detailed emergency response procedures. By deferring contingency planning to a post-consent stage, the application prevents any evaluation of whether appropriate safeguards are in place to respond to pollution events. This not only introduces procedural risk but also undermines the capacity of the competent authority to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of critical environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation are assessed before consent is granted. When such information is lacking, a lawful determination cannot be made. Additionally, the application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the combination of these shortcomings—lack of detailed management plans, the absence of defined mitigation measures, and uncertainty regarding potential impacts—renders the assessment inadequate. This prevents a thorough evaluation of construction and pollution risks and supports the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application under consideration presents a significant concern regarding the assessment of fisheries and marine life, which is inadequate and lacks a thorough evaluation of both ecological and socio-economic impacts. The coastal waters off West Lewis are home to a rich marine ecosystem and support an active fishing industry; however, the proposal does not provide evidence that these essential uses and habitats can be preserved or maintained without notable disruption.

A critical shortcoming lies in the presumption that fishing activities can be displaced

without repercussions. The application fails to substantiate claims that there are alternative fishing grounds available, accessible, and able to accommodate any additional pressure. This lack of evidence is crucial, as displacement of fishing efforts could lead to overfishing in other areas and create broader economic ramifications for the local fishing fleet. Consequently, without a well-supported assessment, the potential impacts on fisheries and the livelihoods dependent upon them remain inadequately understood.

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 over extended durations is expected to disturb marine life over extensive distances, including species such as dolphins. The predicted disturbance to a significant portion of the local bottlenose dolphin population raises alarming issues, yet the application diminishes the importance of these potential effects without providing sufficient evidence.

Inconsistencies within the application further exacerbate concerns. While there is an acknowledgment of the necessity for licenses to permit harm to European Protected Species, the impacts are concurrently described as negligible. This contradiction not only undermines the credibility of the assessment but also raises doubts about compliance with the Habitats Regulations, especially in instances where anticipated harm would require legal authorisation.

The assessment also neglects to account for cumulative impacts resulting from multiple pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. An absence of a comprehensive evaluation regarding these cumulative effects hinders the ability to ascertain the overall implications for 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 falls short of showing that the development can coexist with current marine users or that it can avoid unacceptable impacts on marine biodiversity, thus obstructing any conclusion that the proposal represents sustainable development.

In summary, the deficiencies noted—including a lack of evidence regarding fishing displacement, an underestimation of acoustic impacts, and internal inconsistencies—render the assessment incomplete and unreliable. These shortcomings prevent a robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment regarding the onshore infrastructure is fundamentally inadequate and overlooks the full range of impacts associated with what constitutes a single integrated project. There exists an intrinsic link between the offshore turbines and the onshore works, yet these components are evaluated separately, leading to a fragmented methodology that obscures the overall environmental and socio-economic ramifications.

The onshore works encompass cabling through protected moorland, the construction of a substation in proximity to Stornoway, and the necessary access infrastructure traversing sensitive landscapes. These undertakings require excavation in areas of deep peat, particularly within Barvas Moor, which serves as a critical carbon store and ecologically sensitive habitat. The current application does not deliver a thorough assessment of these impacts, which inhibits a comprehensive understanding of the project's total environmental footprint.

Moreover, the omission or postponement of the assessment concerning onshore impacts hampers an adequate evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all elements of a project must be assessed collectively; however, the distinct treatment of offshore and onshore components results in an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

Significant risks to sensitive habitats also arise, including machair systems and peatland environments that are under policy protection. The application fails to prove that the impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, creating a substantial evidential gap concerning biodiversity protection.

In addition, the routing of infrastructure through active croft land poses potential conflicts with established land use and legal rights. The application lacks evidence that essential consents or processes have been initiated, raising concerns about the feasibility and lawful execution of the project.

From a policy standpoint, the project's disjointed assessment and the inability to demonstrate the protection of peatlands, habitats, and land use interests clash with the National Marine Plan and National Planning Framework 4. The failure to provide assurance that impacts can be avoided or mitigated further weakens the application.

In conclusion, the disaggregation of project components, the absence of a thorough assessment, and the lack of demonstrable evidence regarding environmental and land

use impacts render this segment of the application incomplete and unreliable, inhibiting a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding nocturnal wildlife and dark skies represents a significant evidential gap in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are vital for environmental quality, cultural identity, and tourism, particularly emerging sectors like astro-tourism. The proposed introduction of permanent red aviation lighting, which would be visible over considerable distances, threatens to create a continuous and intrusive "wall of light" across the western horizon, fundamentally changing the night-time environment.

Moreover, the application neglects to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This oversight is particularly alarming given the crucial role dark skies play in the area's identity. The absence of these assessments indicates a substantial gap in the landscape and environmental evaluation.

Additionally, there is no analysis of the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be sensitive to artificial lighting due to phototaxis, which can result in disorientation and increased risks of collision. The lack of a lighting impact assessment or phototaxis study means that there has been no evaluation of how the proposed aviation lighting may impact these species or contribute to increased mortality rates.

The situation is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which fails to account for nocturnal activity and the associated risks. Other species like Kittiwakes, which may forage or migrate at night, are equally at risk of disorientation from artificial lighting, yet this has not been assessed. The absence of site-specific night-time data leads to a critical lack of understanding concerning ecological impacts.

Without a thorough assessment of nocturnal effects, it remains 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 fulfilled, invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission conflicts with National Planning Framework 4 concerning the safeguarding of natural places and environmental quality. Furthermore, it undermines the overall assessment of landscape and seascape impacts, as the night-

time character is an essential aspect of the environment.

In summary, the failure to assess dark skies and nocturnal wildlife comprehensively indicates 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.

TOURISM

The assessment regarding the impacts on tourism is significantly lacking, failing to evaluate the economic and social ramifications for a vital sector of the Isle of Lewis economy. With tourism relying heavily on the area's wild coastline, near-pristine landscape, dark skies, and overall sense of remoteness, it is concerning that the application acknowledges that 86% of visitors are attracted by the scenery yet does not provide a quantified assessment of how large-scale offshore infrastructure could influence visitor numbers, behaviours, or their overall economic contributions.

Tourism has experienced substantial growth, rising from £65 million in 2017 to over £81.5 million, while supporting more than 1,000 jobs and contributing up to 16% to the island's economy. However, the application fails to model the potential impacts of seascape industrialisation and the loss of environmental quality on Tourism Gross Value Added or broader economic resilience. Without such analysis, it remains unclear whether the development would result in a net economic benefit or adversely affect 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 to the visitor experience, including emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortcoming, leading to a considerable gap in understanding the impacts on this recognised and growing aspect of the local economy.

In an island community with limited economic diversification, the oversight in assessing tourism impacts has broader implications for employment, local businesses, and community sustainability. Additionally, 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 standpoint, the application does not adequately demonstrate compliance with National Planning Framework 4, particularly regarding economic impact and the necessity to show net benefit. It conflicts with strategic objectives that recognise tourism as a priority growth sector and fails to provide sufficient evidence for the

competent authority to properly assess the economic consequences of the proposal.

When taken together, the deficiencies in quantifying tourism impacts, assessing environmental factors influencing visitor behaviour, and acknowledging the island's economic dependency create a substantial evidential gap. This hinders a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed and fails to meet the standards required for sustainable development according to statutory duties and national policy. This proposal mirrors the significant issues that led to the rejection of the Lewis Wind Power proposal in 2008, when the extent of industrialisation was deemed unacceptable. Now, despite a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application falls short in crucial areas.

There are critical gaps within the evidential basis for determination. The design envelope remains undefined, and there is an over-reliance on unspecified mitigation measures. Key impact pathways, including those related to nocturnal wildlife, full onshore infrastructure, and tourism effects, have been overlooked. This results in an incomplete Environmental Impact Assessment, leaving the potential significant effects and residual impacts inadequately understood.

Procedural failures are evident throughout the proposal. The lack of a compliant Island Communities Impact Assessment breaches the statutory obligations set by the Islands (Scotland) Act 2018, while the failure to disclose the complete Social Impact Assessment constitutes a serious omission. Such deficiencies hinder the competent authority's ability to evaluate effects on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal directly contradicts National Planning Framework 4, as it does not adequately demonstrate the protection of biodiversity, natural places, and cultural heritage. It fails to show that the health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, particularly due to the absence of tourism impact modelling. Additionally, the cumulative effects of offshore and onshore components have not been thoroughly assessed, obscuring their implications for peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments regarding marine ecology, seabirds, protected species, and

marine mammals are incomplete and inconsistent. The evidential standard required to definitively rule out adverse effects has not been met, engaging the precautionary principle and undermining the validity of any conclusions regarding acceptable impacts.

Moreover, the 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, disruption of cultural and visual relationships, and negative effects on tourism are permanent consequences that cannot be mitigated satisfactorily.

In light of these factors, the application is procedurally and substantively unfit for determination. The combination of significant information deficiencies, policy conflicts, and unresolved environmental risks prohibits a lawful and evidence-based decision. Therefore, it is imperative that consent for the Spiorad na Mara Offshore Wind Farm application is refused entirely.

Additional Comments

This proposal will desecrate the landscape, sea scape, living grounds and burial grounds of Lewis.

There will be no huge uplift in the fortunes of the islands, few jobs have been created in the South West of Scotland, the Central belt and the Lowlands of Scotland where these developments have destroyed the countryside.

The environmental impact of the new infrastructure will remove the opportunity for future generations to explore this unique and historically significant land and seascape.

Everything will be brought in for these developments, with foreign investments and materials being employed.

The Island will not see any benefit from these invaders, those from elsewhere will reap the rewards while the Islanders are left with the eyesore, inconvenience and constant motion.

I strongly object to this proposed development which will destroy the landscape of Bragar and the West Side that my Father, Grandfather and Great Grand Fathers fought to protect.

Member of Public 248

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, which has been submitted under marine licensing and Environmental Impact Assessment regimes. The review of the Environmental Impact Assessment Report and its supporting documentation has revealed material deficiencies in planning, environmental considerations, cultural impacts, and procedural compliance. The development site, located off the west side of the Isle of Lewis, is characterised by an Atlantic-facing coastline, a near-pristine environment, and a rich cultural identity. The scale and proximity of the proposed turbines, along with the design, raise serious concerns about compatibility with statutory requirements, national policy, and the principles of sustainable development.

The application does not provide a robust evidential basis for a lawful determination. Key environmental data is absent, baseline information is inadequate and inconsistent, and essential elements of the proposal remain undefined. The flexible design framework employed limits the understanding of likely significant effects, and the reliance on unspecified mitigation measures renders it impossible to assess their effectiveness. Consequently, the documentation fails to offer a full or informed understanding of the potential environmental, cultural, or community impacts, undermining claims of negligible or non-significant effects, which lack solid 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, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate adherence to national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests for consent and compromise the competent authority's ability to determine the development's acceptability in policy terms.

The unprecedented scale of the proposal, with large turbines positioned in close proximity to the shoreline, raises significant concerns regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, dependence on undefined mitigation measures, evidential weaknesses, and clear non-compliance with policy indicates that the application is incomplete and

cannot support a lawful determination. In such circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and fails to deliver a clear, transparent, and dependable account of the potential environmental impacts of the proposal. The proposal's use of a flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations for the turbines, creates significant uncertainty. This ambiguity hinders the ability to apply a worst-case scenario consistently and jeopardises the integrity of the assessment. Consequently, the impacts outlined may not accurately represent what will ultimately be constructed, preventing both the public and the relevant authorities from fully understanding the extent of the environmental effects.

The application is heavily reliant on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under the premise that environmental harm will be addressed after approval restricts any meaningful evaluation of the effectiveness of these measures or the assessment of residual impacts. This deferment of crucial information to post-consent stages is procedurally unacceptable and contradicts the intentions of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies should be clearly established prior to any determination.

There are notable evidential shortcomings, including insufficient baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. This leads to uncertainty regarding the scale and significance of the impacts, particularly in cases where the report concludes negligible or non-significant effects without robust supporting evidence. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, thereby introducing a level of scientific uncertainty that conflicts with statutory obligations.

As a result, the application does not meet the evidential standards required under the Habitats Regulations to dismiss 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 compliance with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it remains unclear whether the impacts have been thoroughly assessed or if appropriate safeguards exist.

In summary, the combination of an undefined design envelope, lack of specified mitigation measures, and gaps in baseline data renders the Environmental Impact

Assessment Report both unreliable and incomplete. These deficiencies hinder a lawful and thorough assessment of environmental effects, placing the competent authority in a position where it cannot make a well-informed decision based on the information available.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species lacks completeness and reliability in understanding the ecological receptors within the West Lewis coastal environment. This area is known for its biological activity and sensitivity; however, the baseline data provided is insufficient, and the methodologies employed do not effectively capture the presence, behaviour, and habitat use of species. Consequently, the assessment fails to offer a strong evidential basis for evaluating potential impacts.

A significant oversight involves otters, classified as a European Protected Species, as the application does not adequately recognise or assess their active utilisation of coastal areas for foraging and movement. The lack of attention to their core foraging range and behavioural patterns means that the potential impacts of construction-related disturbances, noise, and increased activity have not been sufficiently evaluated. This shortcoming undermines any assertions regarding the absence of significant effects on this species.

There are further deficiencies in the assessment of basking sharks. The reliance on aerial surveys introduces considerable detection bias, especially under Atlantic conditions. This methodology is likely to lead to an underestimation of their presence, particularly when compared with established land-based observations that suggest frequent usage of these waters. The failure to adequately incorporate or consider such data contributes to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological flaws result in conclusions of negligible or non-significant effects being based more on assumptions than on solid evidence. The lack of sufficient baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty surrounding the actual scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the criteria set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these conditions, it is not lawful to grant consent.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, lacking adequate evidence and containing significant internal contradictions that compromise its findings. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already experiencing declines. However, the application does not provide the necessary evidential assurance that these species will remain unaffected. The development is situated within crucial foraging areas and migratory routes, yet the implications of displacement, collision risk, and habitat loss have not been thoroughly assessed.

A critical inconsistency arises within the application, where the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation. Such a case is only warranted when significant harm is anticipated. This contradiction undermines the credibility of the assessment and suggests that the conclusions reached are not adequately supported by the available evidence. Furthermore, the assessment fails to adequately demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unharmed. The significance of these feeding areas is not fully acknowledged, and reliance on modelling approaches introduces uncertainties, particularly for species like Kittiwakes and Fulmars that are in severe decline. The methodologies used are likely to underestimate mortality rates, especially given the limitations of baseline data and the incomplete understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor poses an additional, significant risk by effectively creating a barrier in a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not sufficiently examine the long-term consequences of ongoing mortality within this corridor, nor does it consider the potential effects on species that have relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential standard necessary to conclude that there will be no adverse effects on the integrity of protected sites. The presence of conflicting conclusions, alongside gaps in data and limitations in modelling, indicates that the threshold of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle and hinders a lawful

determination in favour of consent. The identified deficiencies also signify a non-compliance with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to prove that internationally important seabird populations will not be negatively impacted places the proposal in direct conflict with national policy.

In summary, the assessment is rendered unreliable due to its internal inconsistencies, methodological shortcomings, and lack of sufficient evidence. These flaws impede a thorough evaluation of potential impacts and lead to the conclusion that the application fails to meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity is severely lacking, as it fails to acknowledge the West Lewis coastline as a vibrant cultural landscape where the environment, language, tradition, and community are interconnected. The application adopts a simplistic viewpoint, perceiving heritage merely as a collection of static, isolated assets without recognising their ongoing social, cultural, and spiritual relevance within the community.

Significant shortcomings are evident in how culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are treated. These sites serve as active burial places and centres of spiritual practice, yet they are erroneously classified as static features. This oversight neglects their current use, significance, and the potential impact of development on their surroundings. Such mischaracterisation leads to an incomplete assessment of cultural effects, disregarding their importance within community life.

Moreover, the assessment overlooks intangible cultural heritage, including the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These aspects are fundamental to the area's identity but are entirely omitted from the evaluation, leading to a substantial gap in understanding the cultural ramifications of the development.

Concerns are further compounded by issues relating to community rights and participation. The Gaelic-speaking population embodies a distinct cultural identity with attributes recognised as characteristic of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the validity of the assessment and fails to adhere to established principles of participation in decisions that impact cultural and environmental interests.

Additionally, a crucial procedural error is the absence of a proper Island Communities

Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot meet its legal obligation to appraise the social, cultural, and economic impacts on the island community. This omission alone obstructs a lawful decision-making process.

From a policy standpoint, these shortcomings place the proposal in direct opposition to National Planning Framework 4, especially regarding the safeguarding of historic assets and locations. The neglect to consider both tangible and intangible heritage, alongside failing to recognise living cultural practices, constitutes a clear deviation from policy stipulations.

In summary, the inadequacies in assessing living heritage, intangible cultural significance, community rights, and statutory requirements culminate in a substantial evidential void. The cultural impacts of the development have not been adequately evaluated, and the application fails to offer a robust foundation for gauging the true cultural cost of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of seascape, landscape, and visual effects reveals significant deficiencies that do not properly reflect the scale of change or the sensitivity of the surrounding environment. The character of the West Lewis coastline is marked by its open Atlantic horizon and undeveloped nature, which contributes to a strong sense of remoteness. The proposed large-scale turbines, positioned near the shoreline, would introduce a continuous industrial presence that fundamentally alters this character, resulting in a permanent and irreversible transformation of the landscape.

The application underestimates the magnitude of the visual change expected. Given their scale and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and undermining the qualities of naturalness and remoteness that define the area. The assessment fails to adequately communicate this level of impact and its significance within such a sensitive landscape.

Concerns also arise regarding the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not capture the most sensitive receptors or worst-case scenarios, especially in relation to crucial cultural heritage sites and high-value landscapes. This oversight poses a risk of underestimating the visual impact, thereby compromising the assessment's reliability.

Moreover, the application neglects to assess the interconnected relationship between the landscape, seascape, and cultural heritage. Significant sites, including the Calanais

Standing Stones and other Scheduled Monuments, exist within a broader landscape context linked through visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as isolated, failing to acknowledge their interdependence, which leads to an incomplete evaluation of the impacts on their settings and cultural significance.

The anticipated industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and severing their connection to the natural horizon. This creates not just a visual impact but also broader cultural and spatial harm that the application does not adequately address.

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4, particularly regarding the protection of natural places and historic assets. The scale of the proposed changes is at odds with the necessity to safeguard landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case assessment further diminishes any assertion of policy compliance.

It is evident that the impacts identified cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. Consequently, the resulting changes are fundamental and permanent, rather than something that could be rendered acceptable through mitigation efforts.

Overall, the assessment fails to accurately depict the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the safeguarding of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal is fundamentally flawed due to incomplete assessments of construction and pollution risks. The lack of fully developed Construction Environmental Management Plans and Pollution Prevention Plans means there is insufficient detail to assess likely environmental effects. Substantial seabed preparation and installation work will occur in a high-energy Atlantic environment, yet mitigation and contingency measures are only intended to be created after consent is granted. This approach prevents any real evaluation of their adequacy or effectiveness.

The West Lewis coastline features clean coastal waters and crucial habitats that can be severely impacted by sediment disturbance and contamination. Although the application acknowledges risks like sediment mobilisation and accidental chemical or oil spills, it does not adequately outline how these risks will be prevented, controlled, or monitored. There is also significant uncertainty surrounding the scale and behaviour of

sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clear management strategies, it is impossible to ascertain the potential extent, duration, or ecological consequences of these impacts, particularly on the sensitive marine species and habitats identified in the wider assessment.

Moreover, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application undermines the ability to evaluate whether appropriate safeguards are available to address pollution events. This situation creates procedural risk and limits the competent authority's capacity to assess environmental protection measures prior to determination.

From a regulatory standpoint, the deferral of critical environmental safeguards contradicts the Environmental Impact Assessment regime's requirements. Significant effects and mitigation strategies must be evaluated before consent is granted. The absence of this information means that a lawful determination cannot be achieved. Furthermore, the application fails to meet policy requirements concerning environmental protection and water quality.

In conclusion, the overall absence of defined mitigation measures, detailed management plans, and clarity regarding potential impacts creates a materially deficient assessment. These shortcomings hinder a thorough evaluation of construction and pollution risks, supporting the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment of the proposed development raises significant concerns regarding its impact on both fisheries and marine life. The waters off the West Lewis coast are not only home to a diverse marine ecosystem but also support an active fishing industry. However, the application does not convincingly demonstrate how these vital uses and habitats can be safeguarded from substantial disruption.

A critical flaw within the application is the unsubstantiated assumption that fishing activities can simply be relocated without adverse consequences. There is no evidence provided to suggest that alternative fishing grounds are available or capable of accommodating the additional pressures that displacement would create. This oversight is particularly troubling, as it could lead to overfishing in other areas and have broader economic ramifications for the local fishing fleet. The absence of a clear, evidence-based assessment leaves the impacts on fisheries and local livelihoods poorly understood.

Additionally, the proposal poses considerable risks to marine species, especially due to the underwater noise generated by construction activities. The anticipated high-energy hammer piling over an extended period is expected to cause widespread disturbance, which may affect species such as dolphins. Alarming, the potential disruption to a significant portion of the local bottlenose dolphin population is downplayed in the application, lacking adequate supporting evidence.

There exists a noteworthy inconsistency within the application, acknowledging the need for licenses to permit harm to European Protected Species while simultaneously claiming that the impacts are negligible. This contradiction calls into question the credibility of the assessment and raises alarms about compliance with the Habitats Regulations, particularly in situations where anticipated harm necessitates legal authorisation.

Moreover, the cumulative impacts resulting from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities, have not been adequately considered. Without a thorough evaluation of these combined effects, it is impossible to ascertain the overall implications for marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to comply with the National Planning Framework 4 or the National Marine Plan. It does not demonstrate that the proposed development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, which obstructs any conclusion that the proposal constitutes sustainable development.

In summary, the 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 thorough evaluation of the potential impacts on marine life and fisheries.

DARK SKIES AND NOCTURNAL WILDLIFE

The omission of an assessment of dark skies and nocturnal wildlife is a significant gap within the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are crucial for environmental quality, cultural identity, and tourism. The introduction of permanent red aviation lighting, which would be visible over long distances, is likely to create a persistent and disruptive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

Furthermore, 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 concerning given the role that dark skies play in the area's identity and the growth of sectors like astro-tourism. The lack of consideration for these impacts creates a clear deficiency in the overall assessment of the landscape and environmental factors.

A more pressing concern is the absence of analysis regarding the effects of lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are especially vulnerable to artificial lighting due to their phototactic responses, which can lead to disorientation and an increased risk of collision. The application does not include any impact assessment for lighting or a study on phototaxis, thus neglecting the potential effects of aviation lighting on these species and their mortality rates.

Compounding this issue is the reliance on daytime survey data within the ornithological assessment, which does not adequately represent nocturnal activity or the associated risks. Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this potential danger has not been evaluated. The lack of site-specific night-time data creates a crucial gap in understanding the ecological impacts involved.

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

From a policy standpoint, these omissions conflict with National Planning Framework 4, particularly concerning the protection of natural places and environmental quality. They also undermine the overall evaluation of landscape and seascape impacts, as the character of night-time environments is integral to the ecosystem.

Collectively, the lack of assessment regarding dark skies and nocturnal wildlife presents a substantial evidential shortfall. The absence of baseline data, impact modelling, and species-specific analysis leaves the application incomplete and inadequate for supporting a lawful decision.

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 249

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 is informed by a review of the Environmental Impact Assessment Report and supporting documents, highlighting notable deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, nearly untouched environment, and significant cultural heritage. Concerns arise regarding the proposal's scale, proximity, and design in relation to its compliance with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential foundation necessary for a lawful determination. There are gaps in critical environmental data, while baseline information is both limited and inconsistent. Additionally, essential elements of the proposal remain unspecified. The application employs a flexible design framework, which obscures the understanding of potential significant effects. The reliance on yet-to-be-defined mitigation measures means their effectiveness cannot be evaluated. Consequently, the provided documentation falls short of facilitating a comprehensive understanding of the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by reliable evidence.

Substantial conflicts with policy are apparent. 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 well-being. It does not demonstrate compliance with national requirements aimed at safeguarding biodiversity, climate interests, and environmental integrity. These discrepancies directly impact the statutory tests needed for consent and compromise the competent authority's ability to ascertain that the development aligns with policy expectations.

The unprecedented scale of the proposal poses significant challenges in this location, with large turbines planned in close proximity to the shoreline, raising serious issues regarding landscape capacity, visual dominance, and environmental consequences. Collectively, the deficiencies in information, reliance on undefined mitigation measures, evidential shortcomings, and clear policy violations illustrate that the

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species presents significant deficiencies that compromise the understanding of ecological receptors within the West Lewis coastal environment. This area is notably sensitive and biologically active; however, the baseline data provided is incomplete, and the methodologies utilised fail to capture the presence, behaviour, and habitat use of various species. Consequently, the evidential basis for evaluating potential impacts is inadequate.

Specifically, there is a critical oversight regarding otters, a species protected under European law, as the application does not adequately recognise or assess their active foraging and movement in coastal areas. The assessment neglects to consider their core foraging range and behavioural patterns, thereby failing to properly evaluate the potential effects of disturbances caused by construction, noise, and increased activity. This oversight undermines any conclusions drawn about the absence of significant effects on otters.

Further shortcomings exist in the assessment of basking sharks, where the reliance on aerial surveys introduces significant detection bias, particularly under Atlantic conditions. This method is likely to lead to an underestimation of the species' presence, especially when contrasted with established land-based observations indicating their frequent use of these waters. The failure to incorporate or adequately consider such data contributes to an incomplete baseline and diminishes the reliability of the conclusions reached.

These methodological shortcomings mean that assertions of negligible or non-significant effects are based more on assumptions than on sound evidence. The lack of sufficient baseline data obstructs a meaningful assessment of cumulative and indirect impacts, including those arising from seasonal variations and broader ecosystem interactions. This situation generates uncertainty regarding the actual level of risk to marine species and habitats.

From a regulatory standpoint, the application does not conform to the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it has failed to properly identify and assess protected species. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these conditions, it is not lawful to grant consent.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment fundamentally unreliable. These issues hinder a thorough 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 raises serious concerns regarding its reliability due to various methodological weaknesses and significant gaps in evidence. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are in decline. The application fails to adequately demonstrate that these species will remain unaffected, particularly given that the development is situated within crucial foraging areas and migratory pathways. Furthermore, the assessment does not thoroughly consider the risks associated with displacement, collision, or habitat loss.

A major inconsistency within the application is evident, as the developer asserts there will be no significant adverse effects while concurrently making a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This contradiction casts doubt on the validity of the assessment and suggests that the conclusions drawn are not substantiated by adequate evidence.

The methodologies employed are problematic; they may underestimate mortality rates, especially given the lack of complete baseline data and an insufficient understanding of the behavioural responses of species such as Kittiwakes and Fulmars, which are already facing severe decline. The assessment does not convincingly show that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will not be adversely affected. The importance of these feeding grounds is not sufficiently acknowledged, and reliance on modelling introduces further uncertainty.

Additionally, the proposed siting of turbines within a recognised migratory corridor poses a significant risk by potentially obstructing a primary flight path used by species migrating between the United Kingdom and Iceland. The application fails to adequately evaluate the long-term consequences of potential sustained mortality in this corridor, along with the impact on species with relatively small global populations.

From a regulatory viewpoint, the application does not meet the necessary evidential threshold to affirm that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data deficiencies and limitations in modelling, means the standard of beyond reasonable scientific doubt has not been achieved. This engages the precautionary principle and renders any

conclusion in support of consent unlawful.

Overall, the identified deficiencies indicate 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 remain unaffected directly contradicts national policy. Collectively, these issues render the assessment unreliable, leading to the conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development fails to adequately assess cultural heritage and community identity along the West Lewis coastline, which is a living cultural landscape where environment, language, tradition, and community are deeply interconnected. The application adopts a reductive perspective, treating heritage merely as isolated, static assets, rather than acknowledging their ongoing social, cultural, and spiritual significance within the community.

Notably, the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas is a key deficiency. These sites serve as active places of burial and spiritual practice; however, they are classified as static features in the assessment. This oversight neglects their continued use and the implications of development on their surroundings. As a result, the evaluation of cultural effects is incomplete, dismissing their vital role in community life.

Additionally, the assessment disregards intangible cultural heritage, including the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These elements are fundamental to the area's identity, yet they are entirely overlooked, creating a significant gap in understanding the true cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population holds a unique cultural identity with characteristics recognized for Indigenous Peoples, 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 honour established principles of participation in matters affecting cultural and environmental interests.

A further critical procedural failure is the lack 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.

This omission is enough to render the determination unlawful.

From a policy standpoint, the inadequacies in the application place it in direct conflict with National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to account for both tangible and intangible heritage, and the neglect of living cultural practices, signifies a clear violation of policy requirements.

Ultimately, the collective failure to evaluate living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential gap. The cultural impacts of the development remain improperly assessed, and the application lacks a sufficient foundation for understanding the true cultural cost of the proposal.

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 application presents an incomplete assessment of construction and pollution risks, which lacks the necessary detail to evaluate potential environmental effects. It proposes significant seabed preparation and installation works in a high-energy Atlantic environment, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that would be prepared after consent, inhibiting any meaningful evaluation of their adequacy or effectiveness.

The sensitivity of the receiving environment raises additional concerns. 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 chemical or oil spills, it does not provide enough information on how these risks will be prevented, controlled, or monitored.

There is also uncertainty concerning the scale and behaviour of sediment plumes that may result 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 includes potential effects on marine species and habitats identified as sensitive in the broader assessment.

Further compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning to a post-consent phase, the application hampers the evaluation of whether adequate safeguards exist to manage pollution events. This creates procedural risks and undermines the ability of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, deferring critical environmental safeguards conflicts with the Environmental Impact Assessment requirements. Significant effects and mitigation measures must be assessed before consent, and if this information is lacking, 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, absence of detailed management plans, and uncertainty regarding potential impacts render the assessment materially deficient. These shortcomings hinder a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal includes the construction of a substation near Stornoway, cabling across protected moorland, and access infrastructure through sensitive landscapes. These onshore works involve excavation in areas of deep peat, particularly within Barvas Moor, which is known to be a significant carbon store and an ecologically sensitive habitat. The application lacks a comprehensive assessment of these impacts, resulting in an insufficient understanding of the project's overall environmental footprint.

The onshore and offshore components of the project are intrinsically linked; however, they have been assessed separately, leading to a fragmented approach that obscures the true scale of environmental and socio-economic effects. By not assessing the onshore impacts adequately, the application fails to allow for a proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates the consideration of all project components together. The separation of onshore and offshore elements means that the combined impacts on peatlands, habitats, and communities are not fully understood.

Furthermore, there are significant risks posed to sensitive habitats, including machair

systems and peatland environments, which are subject to policy protection. 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 clear evidential gap concerning biodiversity protection.

In addition, the disturbance of peatland can release stored carbon, potentially creating a carbon debt that contradicts the goals of renewable energy development. The application does not address this critical issue or show that the overall carbon balance remains advantageous.

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

From a policy standpoint, the project's lack of comprehensive assessment and failure to demonstrate protection for 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 validity of the application.

Collectively, the separation of project components, the absence of thorough assessment, and the lack of evidence regarding environmental and land use impacts render this part of the application incomplete and unreliable, hindering a lawful determination.

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. The issues that caused the refusal of the Lewis Wind Power proposal in 2008 are repeated in this application. It presents a scale of industrialisation that is still deemed unacceptable, despite being submitted under a policy framework that places increased importance on biodiversity, peatland protection, landscape integrity, and community wellbeing.

There is an inadequate evidential basis for the application. Critical gaps in baseline data exist, and the design envelope remains undefined. Mitigation measures have not been specified, and key impact pathways such as nocturnal wildlife, complete onshore infrastructure, and tourism effects have been omitted. The Environmental Impact Assessment is thus incomplete and does not facilitate a full understanding of likely significant effects or 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, and the omission of a full Social Impact Assessment is a material deficiency. These failures hinder the competent authority from evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

This proposal conflicts with National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural places, or cultural heritage. There is insufficient evidence that health and wellbeing impacts are acceptable, and the absence of tourism impact modelling undermines claims of net economic benefit. The cumulative impact of offshore and onshore elements has not been properly assessed, leaving unclear effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and internally inconsistent. The evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt has not been satisfied, thus engaging the precautionary principle and preventing a lawful conclusion regarding acceptable impacts.

Additionally, 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 relationships, and impacts on tourism are permanent effects that cannot be adequately mitigated.

Overall, the application is unfit for determination both procedurally and substantively. The deficiencies in information, combined with policy conflicts and unresolved environmental risks, inhibit a lawful and evidence-based decision. The competent authority should refuse consent on these grounds or invoke relevant regulatory provisions to obtain the necessary missing information.

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

Additional Comments

Having lived and worked in Stornoway, I know just how important the natural beauty of the island, its wildlife and its community spirit are to its residents. The wind farm poses a very real threat to each of these aspects with what seems to be very minimal benefit for the residents and wider population.

Being able to look out on the horizon and see nothing but the sea and the sky from a

breathhtakingly rugged landscape with no sound apart from the waves and the wind is awe inspiring and humbling. It's a feeling that is unmatched in any other part of Scotland that I have found so far and to take that for granted and destroy it for future generations is incredibly selfish. Despite the potentially well meaning environmental reasons behind the wind farm, they simply do not outweigh the destruction and damage it will cause. Please reconsider.

Member of Public 250

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 application fails to provide an adequate evidential basis for a lawful determination, as 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 complicates the understanding of likely significant effects, while the unspecified mitigation measures mean 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 within the proposal. It appears inconsistent with 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. The application fails to demonstrate that national requirements to protect biodiversity, climate interests, and environmental integrity can be met. These conflicts directly impact the statutory tests required for consent and undermine the capacity of the competent authority to determine that the development is acceptable in policy terms.

The scale of the proposal is unprecedented in this location, as large turbines are positioned in close proximity to the shoreline. This raises significant concerns regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient 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 such circumstances, the precautionary principle must apply. The proposal 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 scale, proximity, and design of the proposal raise fundamental concerns about its compatibility with statutory requirements, national policy, and the principles of sustainable development.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment regarding marine ecology and protected species is fundamentally flawed, failing to deliver a comprehensive and trustworthy understanding of the ecological receptors in the West Lewis coastal environment. This area is a highly sensitive and biologically rich marine system, yet the baseline data provided is insufficient. The methodologies employed do not effectively capture vital details about species presence, behaviour, and habitat usage, leading to an unreliable evidential basis for assessing potential impacts.

One critical oversight involves otters, classified as a European Protected Species. The application does not adequately recognise or evaluate their active use of coastal regions for foraging and movement. Without consideration of their core foraging range and behavioural habits, the potential consequences of construction disturbances, noise, and increased activity remain inadequately assessed. This significant gap undermines the conclusions drawn about the absence of substantial effects on this species.

Additionally, the assessment of basking sharks is marred by its reliance on aerial surveys, which introduce a notable detection bias, especially under Atlantic conditions. This method is likely to underestimate the presence of these sharks, particularly when compared to established land-based observations that indicate their frequent use of the waters. The neglect to incorporate or properly evaluate such information results in an incomplete baseline, thus diminishing the reliability of the conclusions reached.

The limitations inherent in these methodologies mean that the assertions of negligible or non-significant effects stem from assumptions rather than solid evidence. The lack of adequate baseline data obstructs meaningful evaluations of cumulative and indirect impacts, which include seasonal variations and broader ecosystem interactions. This uncertainty raises concerns about the actual level of risk posed to marine species and their habitats.

From a regulatory standpoint, the application does not satisfy the requirements set by the Environmental Impact Assessment regime and the National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainty introduced by these deficiencies hinders the ability to eliminate adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Given these circumstances, granting consent cannot be justified.

In summary, the combination of incomplete baseline data, flawed methodologies, and unfounded conclusions renders the assessment unreliable. These shortcomings hinder a thorough evaluation of impacts on marine ecology and protected species, ultimately supporting the conclusion that the application lacks a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment presents significant gaps in evidence and internal inconsistencies, rendering its conclusions unreliable. 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 meet the necessary evidential standards to demonstrate that these species will not be adversely affected. Key foraging areas and migratory pathways are located near the proposed development, yet the assessment does not adequately evaluate the implications of potential displacement, collision risk, or habitat loss.

There exists a fundamental contradiction within the application, as the developer claims no significant adverse effects while also advancing a Habitats Regulations derogation case, which is only warranted 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 evidence provided. The assessment lacks sufficient proof that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds has not been thoroughly considered, and the reliance on modelling approaches adds uncertainty, particularly concerning species in severe decline like Kittiwakes and Fulmars. The methodologies used likely underestimate mortality rates, especially when baseline data is incomplete and behavioural responses are not fully understood.

The positioning of turbines within a recognised migratory corridor introduces additional risks, effectively creating a barrier along 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 standpoint, the application fails to fulfil the evidential threshold necessary to conclude that there would be no adverse effect on the integrity of protected sites. The presence of contradictory findings, along with data gaps and modelling limitations, means that the standard of beyond reasonable scientific doubt has not been reached. This invokes the precautionary principle and inhibits a lawful conclusion in favour of consent. Furthermore, the identified deficiencies signify non-compliance 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 puts the proposal directly at odds with national policy.

In summary, the assessment is fundamentally flawed due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. These deficiencies 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 assessment fails to recognise the West Lewis coastline as a living cultural landscape where environment, language, tradition, and community are deeply interconnected. Instead, it adopts a simplistic view, treating heritage merely as a collection of static assets, ignoring their ongoing social, cultural, and spiritual functions within the community.

Particularly concerning is 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, yet they are mischaracterised as static features. This oversight neglects their continued use and the importance of their settings, leading to an incomplete understanding of the cultural effects and their significance in community life.

Moreover, the assessment neglects intangible cultural heritage, including the Gaelic language and local traditions, as well as the enduring relationship the community has with the coastal environment. These aspects are essential to the area's identity but are entirely omitted from the evaluation, resulting in a substantial gap in understanding the cultural impact of the development.

There are also serious concerns regarding community rights and engagement. The Gaelic-speaking population is recognised as having a distinct cultural identity akin to that of Indigenous Peoples, 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 fails to adhere to established principles regarding participation in decisions impacting cultural and environmental interests.

Additionally, the failure to conduct a compliant Island Communities Impact Assessment, which is required under the Islands (Scotland) Act 2018, represents a significant procedural lapse. This absence prevents the competent authority from meeting its legal obligation to evaluate the social, cultural, and economic impacts on the island community, thereby hindering a lawful determination.

From a policy standpoint, these shortcomings place the proposal at odds with 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 lack

of recognition for living cultural practices, constitutes a clear deviation from policy requirements.

Overall, the failure to thoroughly assess living heritage, intangible cultural values, community rights, and statutory obligations leads to a considerable evidential gap. The cultural impacts of the development have not been adequately evaluated, leaving the application insufficient for determining the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer has commissioned a Social Impact Assessment that included focus groups with local residents, yet the complete report has not been made public. This situation creates a significant evidential gap that hinders both the public and the competent authority from fully understanding the social risks identified through the developer's own research. Available summaries reveal that residents are currently experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement and are therefore based on real experiences rather than speculation. However, without access to the full assessment, proper scrutiny of these findings is not possible, limiting the ability to gauge their significance in the decision-making process.

Additionally, there is evidence suggesting 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 recognition, these impacts have not been adequately incorporated into the main application or given the weight they deserve. The lack of disclosure regarding the complete Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency compromises the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly when community character and functioning may be at risk. By failing to provide the complete dataset, the application does not offer a thorough evidential basis 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 should foster positive health outcomes and avoid harm, yet the evidence currently available indicates adverse effects that have not been fully disclosed. Consequently, it cannot be established that compliance with this policy is met in the absence of the full assessment.

The procedural implications are significant, as the competent authority is unable to conduct a robust socio-economic and health evaluation without access to the entire 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.

Overall, the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing adverse impacts, leads to an incomplete and unreliable assessment. This shortcoming prevents a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the proposed development lacks sufficient detail regarding the impacts on seascape, landscape, and visual elements, failing to appropriately address the extent of change and the sensitivity of the local environment. The West Lewis coastline is characterised by its expansive Atlantic horizon, its undeveloped nature, and a strong sense of remoteness. The planned introduction of large-scale turbines near the shoreline would result in a continuous industrial presence that fundamentally alters this character and leads to a permanent transformation of the landscape.

The application inadequately conveys the scale of the visual change that would occur. Due to the size and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations. This would directly undermine visual amenity and diminish the naturalness and remoteness that define the area. The assessment does not effectively communicate the significance of this impact within the context of such a sensitive landscape.

There are notable methodological flaws concerning how visual viewpoints are selected and presented. Evidence indicates that these viewpoints may not fully account for the most sensitive receptors or the worst-case scenarios, especially concerning important cultural heritage sites and valued landscapes. This raises the risk that the assessment has understated the magnitude of visual impacts, thus compromising its reliability.

Another significant shortcoming is the failure to consider the interconnected nature of landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are linked to the broader landscape through visual and spatial relationships with the Atlantic horizon. The assessment treats these heritage assets as isolated rather than recognising their interdependence, which leads to an incomplete evaluation of the impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would disrupt these relationships, changing the context in which heritage assets are experienced and their connection to the natural horizon. This represents not merely a visual impact but also a wider cultural and spatial harm that has not been properly assessed in the application.

From a policy standpoint, the proposal directly contravenes the principles outlined in National Planning Framework 4 regarding the safeguarding of natural environments and historic assets. The anticipated changes are inconsistent with the obligation to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case scenario assessment further calls into question any claims of adherence to policy requirements.

It is evident that the identified impacts cannot be effectively mitigated. Given the size, height, and proximity of the turbines, their presence would be overwhelming and unavoidable. Therefore, the resulting changes are fundamental and permanent, not amenable to reduction through mitigation efforts.

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 deficiencies hinder a reliable evaluation and strongly suggest that the proposal is incompatible with the necessary protections for this landscape.

TOURISM

The application does not adequately assess the impacts on tourism, which is a vital sector for the Isle of Lewis. This sector relies heavily on the area's natural features, including its wild coastline, nearly untouched landscapes, dark skies, and the feeling of remoteness. Although it is noted that 86% of visitors are attracted by the scenery, the assessment lacks a numerical evaluation of how large offshore structures might influence visitor numbers, their behaviour, or their overall economic contributions.

Tourism has experienced significant growth, increasing from £65 million in 2017 to more than £81.5 million, supporting over 1,000 jobs and constituting about 16% of the island's economy. However, the application does not examine how the industrialisation of the seascape and a decline in environmental quality would affect Tourism Gross Value Added or the economic resilience of the area. Without this analysis, it is impossible to ascertain whether the proposed development would benefit the economy or harm this established sector.

Additionally, the evaluation overlooks the critical role that environmental quality plays in supporting tourism. This includes the necessity of unspoiled landscapes and dark skies for visitor satisfaction and for emerging sectors such as nature-based tourism and

astro-tourism. The lack of a Dark Skies Assessment exacerbates this oversight, resulting in a significant lack of understanding regarding impacts on an important and growing aspect of the local economy.

In an island community that has limited economic diversity, neglecting 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 properly evaluated, as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application fails to show compliance with National Planning Framework 4, especially regarding economic impacts and the necessity to demonstrate net benefits. It also contradicts strategic goals that identify tourism as a key growth sector and does not furnish enough evidence for the competent authority to evaluate the economic ramifications of the proposal.

Overall, the lack of quantification of tourism impacts, the failure to assess the environmental factors influencing visitor behaviour, and the disregard for the island's economic dependencies create a substantial evidential gap. This gap hinders a thorough examination of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm fails to meet the statutory requirements for sustainable development as outlined in national policy and evidential standards. This proposal is reminiscent of the 2008 Lewis Wind Power application, which was rejected due to unacceptable levels of industrialisation. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the current application does not address the critical issues raised in the previous refusal.

Significant gaps exist in the evidential basis for decision-making. The reliance on an undefined design envelope, unspecified mitigation measures, and the omission of vital impact pathways such as nocturnal wildlife, onshore infrastructure, and tourism effects render the Environmental Impact Assessment incomplete. As a result, the assessment fails to provide a comprehensive understanding of likely significant effects or residual impacts.

Procedural deficiencies are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, and the incomplete disclosure of the Social Impact Assessment constitutes a

material omission. These inadequacies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unsuitable for determination.

The proposal contradicts the National Planning Framework 4, as it does not demonstrate adequate protection for biodiversity, natural places, and cultural heritage. Furthermore, it fails to confirm that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The failure to properly assess the cumulative impacts of offshore and onshore components obscures potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks related to marine ecology, seabirds, protected species, and marine mammals remain unclear and potentially significant. The assessments provided do not meet the evidential threshold required to exclude adverse effects beyond reasonable scientific doubt, which engages the precautionary principle and prevents a lawful determination that impacts are acceptable.

Moreover, the proposal is likely to cause 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 adequately.

In light of these substantive and procedural deficiencies, the application is unfit for determination. The combination of information gaps, policy conflicts, and unresolved environmental risks precludes a lawful, evidence-based decision. The competent authority must refuse consent based on these grounds or invoke the relevant regulatory provisions to require the submission of the missing information.

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

Additional Comments

I am finding it difficult to object to this as I appreciate the need for green energy and I do find wind turbines quite elegant. However, I do think they will have a major negative impact on the community and environment in this instance

Member of Public 251

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.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The deficiencies in the Environmental Impact Assessment Report are significant and cannot be overlooked. A major concern is the reliance on a flexible Project Design

Envelope that lacks commitment to specific turbine dimensions, layouts, or configurations. This introduces considerable uncertainty and undermines the assessment's integrity, leading to a situation where the presented impacts may not accurately represent the eventual development. As a result, the public and the competent authority are unable to grasp the true environmental effects of the proposal.

Furthermore, the application places a heavy emphasis on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent based on the premise that environmental harm will be mitigated later is unacceptable and does not allow for a meaningful evaluation of effectiveness or an assessment of any residual impacts. This postponement of essential information until post-consent stages contradicts the very purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation measures be clearly established before any determination is made.

Additionally, there are considerable evidential deficiencies present, including gaps in baseline data and limitations in the employed methodology, which rely on assumptions rather than site-specific evidence. This leads to uncertainty about the scale and significance of the impacts, especially where conclusions indicating negligible or non-significant effects are drawn without sufficient supporting data. The lack of adequate information hampers a clear understanding of cumulative and worst-case impacts, leading to scientific uncertainty that cannot align with statutory requirements.

The application fails to meet the evidential threshold set by the Habitats Regulations, which is necessary to exclude adverse effects beyond reasonable scientific doubt. This raises concerns regarding the precautionary principle, particularly in relation to protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it cannot substantiate that impacts have been fully assessed or that appropriate 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 ultimately renders the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings hinder a lawful and thorough assessment of environmental effects, putting the competent authority in a position where it cannot make a well-informed determination based on the information currently available.

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. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans, as the application depends on mitigation and contingency measures that will be prepared after consent. This reliance on undefined future measures raises concerns, especially given the sensitivity of the receiving environment. The West Lewis coastline has clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination.

The application notes risks such as sediment mobilisation and accidental chemical or oil spills but does not adequately detail how these risks will be prevented, controlled, or monitored. Additionally, 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 ascertain the extent, duration, or ecological effects of these impacts, including the potential effects on sensitive marine species and habitats.

Furthermore, the absence of detailed emergency response procedures adds to these issues. By postponing contingency planning until after consent, the application limits the evaluation of whether adequate safeguards are in place to manage pollution events. This approach introduces procedural risk and undermines the competent authority's ability to assess environmental protection measures at the determination stage.

From a regulatory standpoint, the deferral of critical environmental safeguards goes against the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be evaluated before consent, and the absence of such information means a lawful determination cannot be achieved. The application does not demonstrate compliance with the policy requirements concerning environmental protection and water quality. Overall, the lack of defined mitigation measures, insufficient detailed management plans, and uncertainty about potential impacts make the assessment materially deficient. These issues hinder a thorough evaluation of construction and pollution risks and indicate that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements for sustainable development as required by statutory duties, national policy, and evidential standards. It mirrors the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. This current application, despite being submitted under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, has not adequately addressed those concerns.

A significant lack of reliable evidential basis exists for the application. Critical gaps in

baseline data are evident, and the continued use of an undefined design envelope raises questions. Moreover, it relies on unspecified mitigation measures and omits key impact pathways such as those affecting nocturnal wildlife, the complete onshore infrastructure, and tourism. This leads to an incomplete Environmental Impact Assessment, which does not facilitate a comprehensive understanding of the likely significant effects or residual impacts.

The application also exhibits clear procedural shortcomings. The absence of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018. Furthermore, the failure to disclose the full Social Impact Assessment is a material omission. These issues impede the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

In direct conflict with National Planning Framework 4, the proposal does not adequately demonstrate the protection of 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. The cumulative effects of both offshore and onshore elements have not been properly assessed, masking impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertain and potentially significant environmental risks remain. Assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some cases, inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

The proposal would result in 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 are permanent effects that cannot be mitigated to an acceptable level.

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

In light of these issues, a formal request is made that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Additional Comments

No assessment has been carried out to assess how this project will impact property prices on the island, it is certain that there will be a negative impact and our properties will drop in value. It will be harder to find prospective buyers in the future.

Will we be compensatsd for property devaluation?

It is also conerning that these developers arent required to ringfence a fund to cover the true cost of future decomissioning. The funds for removal and restoring the sites affected to their original condition should be guaranteed before any works commence. It shouldnt be permitted that these developers can make huge profits and then move on or sell the development leaving the removal costs to others. Why should future generatiins be lumbered with future costs for removal?

Member of Public 252

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 in accordance with the marine licensing and Environmental Impact Assessment regimes. The grounds for this objection arise from an assessment of the Environmental Impact Assessment Report and associated documentation, which reveal substantial deficiencies in planning, environmental considerations, cultural factors, and procedural compliance. Situated off the west side of the Isle of Lewis, the area is characterised by its Atlantic-facing coastline, near-pristine environment, and a strong sense of cultural identity. The design, scale, and proximity of the wind farm proposal raise serious concerns about its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for a lawful determination. It presents missing critical environmental data, limited and inconsistent baseline information, and unclear aspects of the proposal. The flexible design framework inhibits a proper understanding of the likely significant effects, and the unspecified mitigation measures raise doubts about their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, undermining claims of negligible or non-significant effects which lack robust supporting evidence.

There are evident and serious conflicts with policy. 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. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These conflicts directly impact the statutory tests required for consent and compromise the competent authority's ability to determine the proposal's acceptability from a policy perspective.

The scale of this proposal is unprecedented for the location, with large turbines planned in close proximity to the shoreline, raising significant issues regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, dependence on undefined mitigation measures, evidential weaknesses, and clear non-compliance with policy indicates that the application is incomplete and

cannot support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment related to cultural heritage and community identity is deeply flawed, particularly in its treatment of the West Lewis coastline, which should be recognised as a living cultural landscape where environment, language, tradition, and community are interconnected. Rather than acknowledging the ongoing social, cultural, and spiritual functions of heritage within the community, the application adopts a reductive view, treating heritage as a collection of isolated and static assets.

A critical issue arises from the treatment of culturally significant sites, specifically the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet they are categorised in the assessment as static features. This mischaracterisation neglects their continued use and significance, as well as the impact that development would have on their surroundings. Consequently, the evaluation of cultural effects remains incomplete and ignores their integral role in community life.

Intangible cultural heritage has also been overlooked in the application, with essential elements such as the Gaelic language, community traditions, and the longstanding relationship between the local population and the coastal environment excluded from consideration. These aspects are vital to the area's identity, and their absence from the assessment constitutes a major shortcoming. Without addressing these elements, the cultural impact of the proposed development cannot be fully understood.

Further issues pertain to community rights and engagement. The Gaelic-speaking community possesses a distinct cultural identity that aligns with the characteristics 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 adhere to established principles concerning participation in decisions that affect cultural and environmental interests.

The absence of a compliant Island Communities Impact Assessment represents a significant procedural failure, as required by the Islands (Scotland) Act 2018. The competent authority is unable to meet its legal obligations to evaluate the social, cultural, and economic impacts on the island community in the absence of this assessment, which alone inhibits a lawful determination.

From a policy standpoint, these shortcomings place the proposal at odds with National Planning Framework 4, particularly in its obligations to protect historic assets and

places. The failure to consider both tangible and intangible heritage and to acknowledge living cultural practices signals a clear deviation from policy requirements.

Overall, the neglect to assess living heritage, intangible cultural values, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the proposed development have not been adequately evaluated, leaving the application lacking a solid basis for assessing the true cultural costs associated with the proposal.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal does not meet the requirements for sustainable development when evaluated against statutory duties, national policy, and evidential standards. The application brings forth the same core issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. Now, it is being presented under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant gaps in the application's evidential basis. It lacks complete baseline data and continues to utilise an undefined design envelope. Additionally, it relies on unspecified mitigation measures and fails to address key impact pathways, such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism. The Environmental Impact Assessment is incomplete, which hinders a comprehensive understanding of potential significant effects or residual impacts.

Procedural failures are also evident. The absence of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the failure to provide a full Social Impact Assessment is a notable omission. These issues obstruct the competent authority from properly evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal conflicts with National Planning Framework 4. It fails to ensure the protection of biodiversity, natural places, and cultural heritage, does not establish that health and wellbeing impacts are acceptable, and lacks evidence of net economic benefit due to the absence of tourism impact modelling. The cumulative impacts of both offshore and onshore elements have not been thoroughly 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 inconsistent. The evidential threshold necessary to dismiss adverse effects beyond reasonable scientific doubt has not been met, thus invoking the precautionary principle and precluding a lawful conclusion regarding acceptable impacts.

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 impacts on tourism represent permanent effects that cannot be mitigated adequately.

In summary, the application is procedurally and substantively unfit for determination. The significant information deficiencies, along with conflicts in policy and unresolved environmental risks, obstruct the possibility of a lawful and evidence-based decision. The competent authority must refuse consent on these grounds or invoke the appropriate 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.

Member of Public 253

MD-00011742 & MD-00011743 - Spiorad na Mara Limited - Spiorad na Mara Offshore Wind Farm - Isle of Lewis

I formally object to the above application as it contravenes the following planning policies and guidance:

Lack of Community Engagement: There was no consultation with the communities of west Lewis before Crown Estate Scotland identified and leased the N4 area for development. The plan was imposed on them without consent. **Scotland's National Marine Plan (NMP) GEN 18** *'Early and effective engagement should be undertaken with the general public and all interested stakeholders to facilitate planning and consenting processes.'* **NMP Para. 4.77** *'Engagement with the public and other stakeholders should be appropriate, proportionate and meaningful. It should be undertaken as early as possible in planning and consenting processes.'* **NPF4 Spatial Principles - Just Transition.** *'We will empower people to shape their places.'*

Lack of understanding of Cultural Significance: The EIAR makes no reference to the personal, cultural or historical attachment of the population of Lewis to their landscape and heritage, and fails to assess impacts on the living intangible heritage of the Gaelic community. Until a full assessment addressing impacts on Gaelic language and culture, community wellbeing, and west Lewis communities' relationship with their coastline is completed and publicly consulted upon, this application cannot lawfully be determined.

NMP Para. 4.20 *'The historic environment includes all aspects of the environment resulting from the interaction between people and places through time.'*

NPF4 Policy 7 a *'Development proposals with a potentially significant impact on historic assets or places will be accompanied by an assessment which is based on an understanding of the cultural significance of the historic asset and/or place.'*

Significant Adverse Impacts on Protected Birdlife and Habitats: The development occupies primary foraging grounds for the Lewis Peatlands SPA red-throated divers, falls within the foraging range of the St Kilda gannet colony, and crosses a principal UK migratory corridor for protected species, including whooper swan and pink-footed goose. The EIAR fails to adequately assess the threats of collision, displacement, and barrier effects to these declining populations. Thus, consent would breach the **Conservation (Natural Habitats &c.) Regulations 1994**, the **2018 Offshore Regulations**, the **Marine (Scotland) Act 2010**, and the **Wildlife and Countryside Act 1981**, as the proposal is likely to adversely affect the integrity of the following SPA's: Lewis Peatlands, West Coast of the Outer Hebrides, Seas off St Kilda and St Kilda.

NPF4 Policy 7 i *'Development proposals affecting a World Heritage Site or its setting will only be supported where their Outstanding Universal Value is protected and preserved.'*

NPF4 Policy 11 e ix Impact on *'biodiversity including impacts on birds'* must be addressed.

Failure to Protect the Integrity and Setting of Scheduled Monuments: The EIAR anticipates significant adverse effects on coastal heritage. It fails to assess the impact on key scheduled monuments such as SM13786. The proposal would harm the Calanais monuments and wider historic landscape by introducing an industrial horizon into their natural surroundings, fundamentally undermining the meaning, experience, and interconnected setting of these sites, directly conflicting with **NPF4 Policy 7**. There are many alternative sites for offshore wind development and no reasons of over-riding public interest for choosing this site.

NMP Para. 4.22 *'Marine planning should help to ensure that future marine activities and developments can be carried out in a way that respects the marine historic environment and the setting of important coastal heritage assets.'* **Para. 4.23** *'Designated assets should be protected in situ within an appropriate setting.'*

NPF4 Policy 7 h *'Development proposals affecting scheduled monuments will only be supported where: ii 'significant adverse impacts on the integrity of the setting of a scheduled monument are avoided; or iii exceptional circumstances have been demonstrated to justify the impact on a scheduled monument and its setting and impacts on the monument or its setting have been minimised.'*



Unassessed Onshore Impacts and Breach of Statutory Rights of Crofters: Granting offshore consent while onshore impacts on irreplaceable machair and deep peatland remain unassessed, directly contravenes **NPF4 Policy 3**, which requires biodiversity (including irreplaceable habitats) to be left in a demonstrably better state. In addition the proposal fails to engage the statutory rights of crofters under the **Crofters (Scotland) Act 1993**.

NMP Para. 4.77 *'There should be a presumption in favour of publicising applications for marine and terrestrial components of a development together during consenting processes.'*

Irreparable Harm to the Tourism Economy and Coastal Character: The Spiorad na Mara wind farm would permanently industrialise the unspoiled coastal scenery and dark skies on the Isle of Lewis, destroying the very qualities that attract visitors to the island. Local residents have consistently warned during consultation that this visual impact would decimate the tourist industry on which so many islanders depend. Tourism is built on the area's landscape, seascape, heritage, nature, and dark skies. This development risks long-term damage to local businesses and the wider economy, contrary to **NPF4 Policy 30**.

NMP, Para. 12.28 *'An unspoiled environment, high quality landscape and a sense of closeness to nature are important to many people. Scenery and environmental quality are key factors in attracting visitors to Scotland's coasts.'*

Community Opposition and lack of Community Empowerment: The Community Opinion Survey on the Spiorad na Mara Offshore Wind Farm Development (N4) published by www.emg-lewis.co.uk in April 2026 found that 88% of residents from Ness to Uig opposed the N4 development. Approving this project against such overwhelming local consensus would directly contravene the National Islands Plan's commitment to community empowerment.

The National Islands Plan, page 65, para. 5 *'Our vision is for islanders to be empowered to shape their own priorities, build their futures, and protect what makes their communities unique.'*

My further objection points:

This planning decision is about the long-term future and the character of a landscape and community that cannot be replaced once altered at this scale. Spiorad na Mara Offshore Wind Farm would cause significant, cumulative and largely irreversible harm to landscape and seascape character, heritage setting, and the tourism economy. I respectfully request that this application is rejected.

Member of Public 254

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, submitted in accordance with the relevant marine licensing and Environmental Impact Assessment processes. A careful review of the Environmental Impact Assessment Report and accompanying documents reveals significant deficiencies across planning, environmental, cultural, and procedural aspects. Located off the west side of the Isle of Lewis, this area is characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The scale and design of the proposal, combined with its proximity to the shoreline, lead to serious concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks an adequate evidential basis required for a lawful determination. There are critical gaps in environmental data, with limited and inconsistent baseline information, leaving many key aspects of the proposal undefined. The flexible design framework employed means that the potential significant effects cannot be clearly understood, while the reliance on unspecified mitigation measures prevents an assessment of their effectiveness. Consequently, the documents fail to provide a comprehensive understanding of the environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects are unsupported by robust evidence.

In addition, there are significant policy conflicts evident within the proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly concerning biodiversity, natural habitats, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests necessary for consent and weaken the competent authority's ability to determine the proposal as acceptable from a policy standpoint.

The unprecedented scale of the proposed wind farm, with large turbines situated close to the shoreline, raises serious issues relating to landscape capacity, visual impact, and overall environmental consequences. Collectively, the insufficiency of information, reliance on undefined mitigation, evidential weaknesses, and clear non-compliance with policy illustrate that the application is incomplete and unfit for lawful

determination. In light of these circumstances, it is essential that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary completeness and transparency, failing to provide a reliable assessment of the likely environmental effects of the proposed development. By employing a flexible Project Design Envelope without committing to specific turbine dimensions, layouts, or configurations, the application introduces considerable uncertainty. This approach compromises the integrity of the assessment, as it does not allow for a consistent application of a worst-case scenario. Consequently, the impacts presented may not accurately represent the actual development, which hinders both public understanding and the ability of the competent authority to gauge the true extent of environmental effects.

Furthermore, the application is heavily dependent on mitigation measures, monitoring strategies, and management plans that are yet to be defined. This reliance implies that consent is sought with the expectation that environmental harm will be addressed at a later stage, obstructing any meaningful evaluation of effectiveness or assessment of residual impacts. Such deferral of critical information to post-consent phases is procedurally unacceptable and contravenes the objectives of the Environmental Impact Assessment regime, which necessitates that significant effects and mitigation strategies are clearly established before a determination is made.

Additionally, there are marked deficiencies in evidence, including gaps in baseline data and methodological limitations, alongside an overreliance on assumptions rather than site-specific evidence. This results in uncertainty surrounding the scale and significance of impacts, particularly where negligible or non-significant effects are claimed without robust supporting data. The lack of adequate information impedes a comprehensive understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory requirements.

As a result, the application does not meet the evidential threshold mandated by the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. The precautionary principle is especially pertinent in relation to protected species and sensitive habitats. Moreover, the proposal does not demonstrate compliance with National Planning Framework 4, specifically regarding biodiversity protection and environmental integrity, as it cannot be substantiated that impacts have been thoroughly assessed or that appropriate safeguards are in place.

In summary, the combination of an undefined design envelope, unspecified mitigation strategies, and insufficient baseline data renders the Environmental Impact

Assessment Report unreliable and incomplete. These shortcomings obstruct a lawful and thorough assessment of environmental effects, leaving the competent authority ill-equipped to make a decision based on the information provided.

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.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment concerning seascape, landscape, and visual impacts is significantly inadequate and does not properly address the extent of the anticipated change or the sensitivity of the affected environment. The coastline of West Lewis is characterised by an open Atlantic horizon, an undeveloped landscape, and a profound sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the shore would impose a continuous and overwhelming industrial presence, fundamentally transforming this character and leading to a permanent and irreversible change to the landscape.

Moreover, the application fails to accurately depict the magnitude of the anticipated visual change. Given their scale and proximity, the turbines would dominate the views from residential areas, historic locations, and frequently visited coastal sites. This would adversely affect visual amenity and diminish 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.

Concerns also arise regarding the selection and presentation of visual viewpoints. Evidence indicates that the viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly regarding significant cultural heritage sites and high-value landscapes. This raises the possibility that the assessment may have understated the magnitude of visual impact, thereby compromising the overall reliability of the evaluation.

A significant oversight is the failure to consider the interconnectedness between landscape, seascape, and cultural heritage. Notable sites, including the Calanais Standing Stones and other Scheduled Monuments, are integral to a broader landscape, interconnected by visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as isolated entities, neglecting their interdependence and resulting in an incomplete evaluation of 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 connection to the natural horizon. This constitutes not only a visual impact but also a broader cultural and spatial detriment that has not been sufficiently addressed in the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 regarding the preservation of natural places and historic assets. The extent of change proposed is inconsistent with the obligation 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 requirements.

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

Overall, the assessment does not accurately reflect the scale of impact, the sensitivity of the environment, or the interrelated nature of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is inconsistent with the safeguarding of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application presents significant deficiencies in its assessment of construction and pollution risks, leading to an incomplete understanding of potential environmental effects. It involves considerable seabed preparation and installation works within a high-energy Atlantic environment, yet fails to provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on post-consent mitigation and contingency measures, which prevents any thorough evaluation of their adequacy or effectiveness.

Given the sensitivity of the receiving environment, this reliance on undefined future measures raises serious concerns. The West Lewis coastline is home to clean coastal waters and important habitats that are at risk of sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental spills of chemicals or oil, it lacks sufficient detail on the prevention, control, or monitoring of these risks.

Additionally, 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 is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also extends to the potential effects on marine species and habitats already recognised as sensitive within 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 to address pollution events. This introduces procedural risks and diminishes the competent authority's ability to assess environmental protection measures effectively at the determination stage.

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 mitigation measures must be evaluated prior to consent, and the absence of such information means a lawful determination cannot be achieved. The application also fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, insufficient detailed management plans, and uncertainty regarding potential impacts result in a materially deficient assessment. These shortcomings obstruct a comprehensive evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal presents a number of significant deficiencies that hinder a reliable evaluation of its impacts on marine life and fisheries. A key concern is the application's inadequate assessment of fisheries and marine life, which fails to provide a thorough evaluation of both ecological and socio-economic consequences. The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the application does not adequately demonstrate that these habitats and uses can be safeguarded from substantial disruption.

There is a troubling assumption within the application regarding the displacement of fishing activities. It suggests that this can occur without any adverse consequences, yet there is no evidence to support the availability or accessibility of alternative fishing grounds capable of handling the added pressure. This is a serious omission, as such displacement could lead to overfishing in other areas, potentially resulting in significant economic repercussions for the local fishing fleet. Without a clear and evidence-based assessment, understanding the effects on fisheries and local livelihoods becomes impossible.

Additionally, the proposal raises alarming risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over an extended period is expected to disturb marine life across wide areas, including vulnerable species such as dolphins. The anticipated disturbance to a considerable portion of the local bottlenose dolphin population is deeply concerning, yet the application minimizes the significance of these effects without adequate supporting evidence.

The application exhibits a notable inconsistency: while it acknowledges the necessity of licences for harm to European Protected Species, it simultaneously asserts that the impacts are negligible. This contradiction undermines the credibility of the assessment and raises serious concerns about compliance with the Habitats Regulations, especially where harm necessitates legal authorisation.

Moreover, the assessment does not account for cumulative impacts that could arise from various pressures such as habitat disturbance, noise, and the displacement of fishing activities. Without a thorough 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 adherence to the National Planning Framework 4 or the National Marine Plan. It does not establish that the proposed development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, which is essential for concluding that the project represents sustainable development.

In summary, the lack of supporting evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the application render the assessment incomplete and unreliable. These shortcomings obstruct a thorough evaluation of the potential impacts on 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 absence of an assessment of dark skies and nocturnal wildlife is a significant oversight in the Environmental Impact Assessment, raising concerns about its completeness. The West Lewis coastline is known for its exceptionally dark skies, which are vital for environmental quality, cultural identity, and tourism, particularly in emerging sectors like astro-tourism. The proposal includes the installation of permanent red aviation lighting that would create a continuous "wall of light" effect across the western horizon, fundamentally changing the night-time environment and visual amenity.

Additionally, the application fails to evaluate how this lighting would impact landscape

character or affect the experiences of both residents and visitors. This lack of consideration is concerning given the importance of preserving dark skies to the area's identity. There is also a critical failure to assess the impact of the proposed lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be particularly sensitive to artificial lighting, which can cause disorientation and increase the risk of collision. The absence of a lighting impact assessment or phototaxis study means there is no analysis of how aviation lighting might impact these species or contribute to increased mortality.

This oversight is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not reflect nocturnal activity or the associated risks. Other species, like Kittiwakes, that may forage or migrate at night are also susceptible to disorientation from artificial lighting, but this risk remains unassessed. The lack of site-specific night-time data creates a significant gap in understanding the ecological impacts of the proposal.

Without an assessment of nocturnal impacts, it becomes impossible to determine whether protected species or designated sites would be adversely affected. The evidential standard needed to exclude adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and preventing a lawful determination of the application.

From a policy standpoint, this omission contradicts National Planning Framework 4, which focuses on protecting natural spaces and maintaining environmental quality. Moreover, it undermines the overall evaluation of landscape and seascape impacts, as the character of the night-time environment is an integral aspect of the ecosystem.

In summary, the lack of any evaluation of dark skies and nocturnal wildlife leads to a significant evidential gap. The absence of baseline data, impact modelling, and species-specific analysis means the application is incomplete and cannot adequately support a lawful determination.

TOURISM

The application acknowledges that 86% of visitors to the Isle of Lewis are attracted by scenery, yet it fails to provide a quantified assessment of how large-scale offshore infrastructure may impact visitor numbers, behaviour, or the overall economic contribution from tourism. This sector relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness. Despite tourism's growth, from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and accounts for up to 16% of the island's economy, the assessment neglects to model the potential effects of industrialisation on the seascape and loss of environmental quality

on Tourism Gross Value Added and broader economic resilience.

Furthermore, the application does not consider the essential role of environmental quality in sustaining tourism. The importance of unspoiled landscapes and dark skies for visitor experiences is particularly relevant to emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this oversight, resulting in a significant gap in understanding the impacts on a key aspect of the local economy.

In a community with limited economic diversification, the inadequate assessment of tourism impacts carries broader implications for employment, local businesses, and community sustainability. The omission of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been adequately evaluated, which is a requirement 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 necessity to show a net benefit. It also 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.

Overall, the failure to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and consider the island's economic dependency results in a substantial evidential gap. This lack of analysis hinders a robust evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm fails to meet the statutory requirements for sustainable development as outlined in national policy and evidential standards. This proposal is reminiscent of the 2008 Lewis Wind Power application, which was rejected due to unacceptable levels of industrialisation. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the current application does not address the critical issues raised in the previous refusal.

Significant gaps exist in the evidential basis for decision-making. The reliance on an undefined design envelope, unspecified mitigation measures, and the omission of vital impact pathways such as nocturnal wildlife, onshore infrastructure, and tourism effects render the Environmental Impact Assessment incomplete. As a result, the assessment fails to provide a comprehensive understanding of likely significant effects or residual impacts.

Procedural deficiencies are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, and the incomplete disclosure of the Social Impact Assessment constitutes a material omission. These inadequacies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unsuitable for determination.

The proposal contradicts the National Planning Framework 4, as it does not demonstrate adequate protection for biodiversity, natural places, and cultural heritage. Furthermore, it fails to confirm that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The failure to properly assess the cumulative impacts of offshore and onshore components obscures potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks related to marine ecology, seabirds, protected species, and marine mammals remain unclear and potentially significant. The assessments provided do not meet the evidential threshold required to exclude adverse effects beyond reasonable scientific doubt, which engages the precautionary principle and prevents a lawful determination that impacts are acceptable.

Moreover, the proposal is likely to cause 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 adequately.

In light of these substantive and procedural deficiencies, the application is unfit for determination. The combination of information gaps, policy conflicts, and unresolved environmental risks precludes a lawful, evidence-based decision. The competent authority must refuse consent based on these grounds or invoke the relevant regulatory provisions to require the submission of the missing information.

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

Additional Comments

I live and work on the Isle of Lewis and am directly affected by the proposed Spiòrad na Mara offshore wind development.

My concerns are not theoretical – they relate to the day-to-day reality of living in a

relatively small, close-knit island community where changes of this scale are highly visible and long-lasting.

The visual impact of the development is a significant concern. The seascape and landscape around Lewis are a core part of both the local environment and identity. Large-scale offshore infrastructure risks permanently altering that character. This is not something that can be easily reversed once built.

I am also concerned about the cumulative impact of this development alongside existing and proposed infrastructure. Individually, projects may be presented as acceptable, but collectively they can lead to a substantial and irreversible change to the area.

There are also wider concerns about marine life, fisheries, and the knock-on effects on local livelihoods. These industries are important to the local economy and culture, and any risk to them should be carefully and thoroughly assessed.

Onshore infrastructure is another area of concern. The full impact is often less visible at first glance but can have significant consequences for communities, including disruption during construction and long-term changes to the landscape.

Tourism is also an important part of the local economy, and the appeal of the area is closely tied to its natural environment. Any degradation of that environment has the potential to affect visitor numbers and local businesses.

Overall, I do not believe the current assessment adequately reflects the scale of the impact on the local environment and community. Given the potential long-term consequences, a more cautious approach is justified.

Member of Public 255

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 relevant marine licensing and Environmental Impact Assessment regimes. The objection is founded on a thorough examination of the Environmental Impact Assessment Report and accompanying documentation, highlighting 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, a region characterised by its Atlantic-facing coastline, relatively untouched environment, and strong cultural identity. Concerns regarding the scale, proximity, and design of the project raise serious questions about its adherence to 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, with baseline information being limited and inconsistent, and significant components of the proposal remaining undefined. The flexible design framework used hinders a clear assessment of likely significant effects, while the reliance on unspecified mitigation measures makes it impossible to evaluate 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.

There are evident and substantial conflicts with policy. The proposal seems 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 that national obligations to safeguard biodiversity, climate interests, and environmental integrity can be fulfilled. Such conflicts directly affect the statutory tests necessary for consent and compromise the ability of the competent authority to determine the acceptability of the development in policy terms.

The unprecedented scale of the proposal, with large turbines placed in close proximity to the shoreline, raises significant concerns related to landscape capacity, visual impact, and environmental effects. Collectively, the lack of adequate information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance indicate that the application is incomplete and cannot support a

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

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 West Lewis coastline is characterised by its open Atlantic horizon and a strong sense of remoteness, which is essential to its undeveloped character. The proposal for large-scale turbines in close proximity to the shoreline would result in a continuous industrial presence that would fundamentally change this character, leading to a permanent and irreversible transformation of the landscape.

The magnitude of visual change associated with this application is inadequately represented. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and eroding the defining qualities of naturalness and remoteness. The assessment fails to convey the significance of this impact within such a sensitive landscape.

Concerns also arise regarding the selection and presentation of visual viewpoints in the assessment. Evidence indicates that these viewpoints may not fully capture the sensitivity of key cultural heritage sites or the worst-case scenarios, particularly concerning high-value landscapes. This raises the risk of underestimating the magnitude of visual impact, which undermines the reliability of the assessment.

Furthermore, there is a notable deficiency in assessing the interconnectedness of landscape, seascape, and cultural heritage. Significant sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a wider landscape context linked to the Atlantic horizon. The assessment treats these heritage assets in isolation rather than recognising their interdependence, resulting in an incomplete evaluation of impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would sever these vital connections, disrupting how heritage assets are experienced in relation to the natural horizon. This represents not only a significant visual impact but also broader cultural and spatial harm that has not been adequately assessed.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4 regarding the protection of natural places and historic assets. The scale of change is incompatible with the need to safeguard landscape character, visual amenity, and the setting of culturally significant sites. The lack of a robust worst-case assessment further undermines any assertions of policy compliance.

Additionally, 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 unavoidable. Thus, the resulting change is fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation.

In summary, the assessment fails to accurately represent the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These deficiencies prevent a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife represents a significant oversight within the Environmental Impact Assessment. The West Lewis coastline boasts remarkably dark skies, which are vital to the area's environmental quality, cultural identity, and tourism potential. The proposal includes the installation of permanent red aviation lighting that will be visible over extensive distances, leading to a continuous and intrusive “wall of light” effect on the western horizon, fundamentally changing the night-time landscape.

Moreover, the application fails to evaluate the implications of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This lack of consideration is particularly concerning given the critical role dark skies play in the identity of the area and the growth of sectors such as astro-tourism. The resulting gap in the overall assessment of the landscape and environment is evident.

Equally troubling is the absence of an evaluation of the impacts on nocturnal wildlife. Notably, 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 lighting impact assessment or phototaxis study, meaning it does not adequately consider how aviation lighting may affect these species or contribute to increased mortality rates.

The reliance on daytime survey data in the ornithological assessment further exacerbates this issue, as it fails to account for nocturnal activity or associated hazards.

Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been taken into account. The absence of site-specific data for night-time creates a crucial gap in understanding the ecological impacts involved.

Without a thorough assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would face adverse effects. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt cannot be achieved, which invokes the precautionary principle and obstructs a lawful determination.

From a policy standpoint, this omission is at odds with National Planning Framework 4 concerning the protection of natural spaces and the maintenance of environmental quality. Additionally, it undermines the comprehensive evaluation of landscape and seascape impacts, as the night-time character is an essential component of the environment.

In summary, the lack of any assessment regarding dark skies and nocturnal wildlife signifies a considerable evidential gap. The failure to provide 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 within the application is inadequate, particularly in relation to 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. Despite acknowledging that 86% of visitors are attracted by the scenery, the application lacks a quantitative analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism has seen 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. However, 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 of the area. Without this analysis, it is impossible to ascertain whether the development would bring a net economic benefit or jeopardise an established and thriving sector.

Furthermore, the assessment neglects to consider how environmental quality supports tourism, overlooking the significance 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 deficiency, leaving a critical 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 properly assessed 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 concerning economic impact and the requirement for showing net benefit. It also contradicts strategic objectives that position tourism as a priority growth sector and fails to present adequate evidence for the competent authority to assess the economic ramifications of the proposal.

In summary, the lack of quantification regarding tourism impacts, the omission of analyses on environmental influences on visitor behaviour, and the disregard for the island's economic dependency culminate in a significant evidential shortfall. This gap hinders a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed in its ability to meet the standards of sustainable development as required by statutory duties and national policy. It mirrors the key 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 biodiversity, peatland protection, landscape integrity, and community wellbeing, it still fails to address these critical areas adequately.

A major concern is the lack of a complete and reliable evidential basis for the application. There are significant gaps in baseline data, an undefined design envelope is still in use, and there is a heavy reliance on unspecified mitigation measures. Additionally, key impact pathways, such as those affecting nocturnal wildlife, onshore infrastructure, and tourism, have not been adequately addressed. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of the likely significant effects or any residual impacts.

Procedural failures are evident in the application as well. The absence of a compliant Island Communities Impact Assessment breaches statutory obligations under the

Islands (Scotland) Act 2018, while the lack of a full Social Impact Assessment represents a substantial 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 consideration.

Furthermore, the proposal contradicts the National Planning Framework 4, lacking evidence for the protection of biodiversity, natural areas, and cultural heritage. It does not demonstrate that the impacts on health and wellbeing are acceptable, nor does it provide evidence of a net economic benefit due to the absence of tourism impact assessments. The cumulative impacts of both offshore and onshore components have not been appropriately evaluated, leading to a lack of clarity regarding the 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, at times, inconsistent. The evidential threshold required to demonstrate the absence of adverse effects beyond reasonable scientific doubt has not been satisfied. This engages the precautionary principle, thereby precluding a lawful conclusion regarding the acceptability of the impacts.

The proposal would induce 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 signify permanent impacts that cannot be sufficiently mitigated.

In summary, the application presents both procedural and substantive deficiencies that render it unfit for determination. The extent of the informational gaps, coupled with conflicts with policy and unresolved environmental risks, obstructs a lawful and evidence-based decision-making process. Therefore, it is requested that the application for the Spiorad na Mara Offshore Wind Farm is refused in its entirety.

Additional Comments

My Parents live on Lewis and they and I will be very much impacted by the sight of these huge turbines in the ocean. They moved there for a sense of tranquility and the property looks out to the sea. The reason people love the seaview is that it has no horizon and is so beneficial for mental health. These turbines are far away from where the electric that they produce is needed therefore they are not beneficial to the people that will have to suffer the consequences of their being there.

I urge you to refuse this application

Member of Public 256

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, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection is based on a review of the Environmental Impact Assessment Report and related documentation, which highlights significant planning, environmental, cultural, and procedural shortcomings. Located off the west side of the Isle of Lewis, this area is characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. The size, location, and design of the project raise serious questions about its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application does not provide an adequate evidential basis for a lawful decision. There is a lack of critical environmental data, and the baseline information is inconsistent and limited. Important elements of the proposal remain undefined. The reliance on a flexible design framework complicates the understanding of potential significant effects, while the use of unspecified mitigation measures makes it impossible to evaluate their effectiveness. Consequently, the documentation fails to deliver a comprehensive understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack solid evidence.

There are notable and substantial policy inconsistencies. The proposal seems at odds with 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 obligations to safeguard biodiversity, climate interests, and environmental integrity. These inconsistencies challenge the statutory tests needed for consent and weaken the capacity of the competent authority to affirm that the development is acceptable according to policy.

The scale of the proposal is unprecedented for this area, featuring large turbines close to the shoreline, which raises serious concerns about landscape capacity, visual dominance, and environmental impact. In light of the insufficient information, reliance on undefined mitigation measures, evidential weaknesses, and evident policy conflicts, it is clear that the application is incomplete and cannot support a lawful determination. Therefore, the precautionary principle should be applied in this situation.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed development raises significant concerns regarding the assessment of marine ecology and protected species, which is notably deficient and fails to deliver a comprehensive or reliable understanding of the ecological receptors present in the West Lewis coastal environment. This marine system is recognised as being highly sensitive and biologically active, yet the baseline data gathered is inadequate, and the methodologies employed do not effectively capture essential information on species presence, behaviour, and habitat utilisation. Consequently, the assessment does not provide a solid evidential foundation for evaluating potential impacts.

A critical shortfall in the assessment relates to otters, a European Protected Species. The application does not sufficiently acknowledge or evaluate their active use of coastal areas for foraging and movement. The omission of their core foraging range and behavioural patterns means that the assessment does not adequately consider the potential impacts of construction disturbance, noise, and increased activity. This lack of thorough analysis compromises the conclusions drawn regarding the absence of significant effects on this species.

Moreover, there are further shortcomings in the assessment of basking sharks, particularly due to an overreliance on aerial surveys, which creates significant detection bias, especially in Atlantic conditions. This method is likely to underestimate the presence of basking sharks when compared to established land-based observations that indicate these waters are used frequently. The failure to incorporate or properly consider such data leads to an incomplete baseline and diminishes the reliability of the conclusions reached.

These methodological shortcomings result in claims of negligible or non-significant effects being founded on assumptions rather than solid evidence. The lack of adequate baseline data also hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty about the actual scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements set by 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 introduced prevents the clear exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. In light of these factors, consent cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These deficiencies inhibit

a robust evaluation of impacts on marine ecology and protected species, underscoring the overarching conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents a fundamentally flawed ornithological assessment, characterised by significant evidence gaps and internal contradictions that undermine its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations that are already facing decline, yet the proposal does not adequately demonstrate, to the necessary evidential standard, that these species will not be adversely affected. Key foraging areas and migratory pathways are directly impacted by the development, but the assessment fails to thoroughly evaluate the risks of displacement, collision, or habitat loss.

A critical inconsistency is evident in the application, as the developer claims there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only relevant where significant harm is anticipated. This contradiction raises serious questions about the reliability of the assessment and suggests that its conclusions lack support from the underlying evidence.

The assessment lacks sufficient evidence to ensure 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 not properly considered, and the reliance on modelling techniques introduces uncertainty, particularly concerning species in severe decline like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, especially where baseline data is insufficient and behavioural responses are inadequately understood.

Placing turbines within a recognised migratory corridor introduces considerable risk, effectively creating a barrier along 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 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 conclude that there will be no adverse effect 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 met. This situation invokes the precautionary principle, inhibiting any lawful conclusion in favour of consent.

The identified deficiencies also signify non-compliance 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.

Overall, the assessment is deemed unreliable due to its internal inconsistencies, methodological flaws, and lack of adequate evidence. These issues impede a thorough evaluation of potential impacts and contribute to the conclusion that the application fails to satisfy the statutory requirements essential for determination.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and profound sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the shoreline would create a continuous and overwhelming industrial presence, which would fundamentally alter this character and lead to a permanent and irreversible transformation of the landscape. The assessment of seascape, landscape, and visual impacts is materially deficient, failing to adequately represent the magnitude of this visual change. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and frequently visited coastal locations, directly impacting visual amenity and eroding the defining qualities of naturalness and remoteness.

There are significant methodological concerns regarding the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not accurately reflect the most sensitive receptors or worst-case scenarios, especially regarding key cultural heritage sites and high-value landscapes. This raises the possibility that the magnitude of visual impact has been understated, which undermines the reliability of the assessment. Additionally, the assessment does not adequately evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Important sites like 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 sites as isolated assets fails to recognise their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would sever these crucial relationships, altering the context in which heritage assets are experienced and disrupting their connection to the natural horizon. This represents not only a visual impact but also a more extensive cultural and spatial harm that has not been sufficiently assessed within the application. From a policy standpoint, the proposal conflicts directly with National Planning Framework 4 concerning the protection of natural places and historic assets. The scale of change is incompatible with the requirement to safeguard landscape character,

visual amenity, and the setting of culturally significant sites. The lack of a robust worst-case assessment further diminishes any claims 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 dominant and unavoidable. Thus, the resulting change is fundamental and permanent, rather than capable of being reduced to an acceptable level through mitigation measures. In conclusion, the assessment fails to accurately represent 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.

CONSTRUCTION AND POLLUTION RISKS

The proposal involves extensive seabed preparation and installation works within a challenging Atlantic environment, yet it lacks comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. This shortfall is troubling, particularly as the application relies on unspecified mitigation and contingency measures that are to be established only after consent is granted. Such an approach obstructs any meaningful assessment of these measures' adequacy and effectiveness.

The West Lewis coastline is home to clean coastal waters and vital habitats, which are at risk of disturbance and contamination from sediment. While the application acknowledges the potential risks of sediment mobilisation and the possibility of chemical or oil spills, it does not adequately detail the strategies for prevention, control, or monitoring of these risks. This inadequacy is concerning given the sensitivity of the receiving environment.

Moreover, there is ambiguity regarding the scale and behaviour of sediment plumes that may result from seabed disruption and cable installation. Without thorough modelling and clearly defined management strategies, the extent, duration, and ecological impacts of these disturbances remain indeterminate. This uncertainty also applies to potential effects on marine species and habitats that have been identified as sensitive within the broader assessment.

Additionally, the lack of detailed emergency response procedures exacerbates the situation. By postponing contingency planning to a stage after consent, the application hinders the assessment of whether adequate safeguards are available to address pollution incidents. This creates procedural risks and undermines the competent authority's ability to evaluate environmental protection measures at the time of determination.

From a regulatory viewpoint, the postponement of essential environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. It is critical that likely significant effects and mitigation are assessed prior to consent, and the absence of such information renders a lawful determination impossible. The application further fails to show 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 collectively render the assessment materially deficient. These shortcomings inhibit a robust evaluation of construction and pollution risks and underscore the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application lacks a comprehensive assessment of the impacts on fisheries and marine life, failing to provide a solid evaluation of both ecological and socio-economic factors. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing industry. However, there is no demonstration that these vital habitats and activities can be preserved without significant disruption.

A major concern is the assumption that fishing activity can simply be relocated without adverse effects. The application does not provide evidence regarding the availability or accessibility of alternative fishing grounds that could sustain additional pressure. This oversight is critical because displacing fishing efforts could lead to overfishing in other areas and result in broader economic repercussions for the local fishing fleet. Without a rigorous, evidence-based assessment, the implications for both fisheries and livelihoods remain unclear.

The proposal poses considerable risks to marine species, particularly due to the underwater noise generated during the construction phase. Extended periods of high-energy hammer piling are expected to disturb marine life over significant distances, affecting species including dolphins. The anticipated disturbance to a notable segment of the local bottlenose dolphin population raises serious issues. Yet the application minimises these effects without adequate supporting evidence, which is concerning.

Moreover, there exists a contradiction within the application regarding the need for licences to authorise harm to European Protected Species while concurrently classifying the impacts as negligible. This inconsistency undermines the reliability of the assessment and raises questions about compliance with the Habitats Regulations, especially in contexts where harm is anticipated to a level requiring legal permission.

Additionally, the assessment overlooks cumulative impacts from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. The absence of a thorough evaluation of these combined effects means that the overall impact on marine ecosystems and socio-economic conditions remains indeterminate.

From a policy standpoint, the application does not meet the standards set by National Planning Framework 4 or the National Marine Plan. It fails to demonstrate that the proposed development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, which obstructs any conclusion regarding its sustainability.

In summary, the deficiencies in evidence concerning fishing displacement, the underestimation of acoustic impacts, and the internal contradictions render the assessment flawed and unreliable. These shortcomings inhibit a thorough evaluation of the impacts on marine life and fisheries.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an evaluation regarding dark skies and nocturnal wildlife is a significant oversight in the Environmental Impact Assessment. The West Lewis coastline boasts exceptionally dark skies, which are integral to the area's environmental quality, cultural identity, and tourism appeal. The introduction of permanent red aviation lighting, which will be visible over long distances, is set to create a continuous and intrusive “wall of light” effect across the western horizon, fundamentally altering the night-time environment.

Furthermore, the application does not consider the impact this lighting would have on visual amenity, landscape character, or the experience of both residents and visitors. This lack of assessment is particularly concerning, given the critical role that dark skies play in the area's identity and in emerging sectors like astro-tourism. The failure to address these impacts results in a notable gap in the landscape and environmental evaluation.

Equally alarming is the neglect of potential impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to phototaxis, which may cause disorientation and elevate the risk of collision. The application omits any lighting impact assessment or phototaxis study, failing to evaluate how aviation lighting could affect these species or increase mortality rates.

This issue is further exacerbated by the reliance on daytime survey data within the

ornithological assessment, which does not adequately reflect nocturnal activity or associated risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been assessed. The lack of site-specific night-time data creates a substantial gap in comprehending ecological impacts.

Without a thorough assessment of nocturnal effects, it is impossible to ascertain whether protected species or designated sites might be negatively impacted. The required evidential standard to confidently exclude adverse effects cannot be achieved, invoking the precautionary principle and preventing a lawful determination.

From a policy standpoint, these omissions are in conflict with National Planning Framework 4 regarding the protection of natural places and environmental quality. They also diminish the overall evaluation of landscape and seascape impacts, as the character of the night-time environment is a crucial element of the landscape.

In conclusion, the failure to assess dark skies and nocturnal wildlife represents a substantial evidential gap. The lack of baseline data, impact modelling, and species-specific analysis means the application is incomplete and cannot support a lawful determination.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm demonstrates significant shortcomings regarding sustainable development, as assessed against statutory obligations, national policies, and evidential standards. This proposal mirrors the issues that resulted in the refusal of the Lewis Wind Power application in 2008, when the scale of industrialisation was deemed unacceptable. Despite being presented under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, it fails to address these crucial aspects adequately.

There are substantial gaps in the evidential basis required for a thorough determination of the application. Key areas such as baseline data, the ambiguous design envelope, unspecified mitigation measures, and the exclusion of critical impact pathways—including nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects—are notably lacking. Consequently, the Environmental Impact Assessment is incomplete, hindering a full understanding of the likely significant effects and residual impacts associated with the proposal.

Additionally, procedural deficiencies are evident. The omission of a compliant Island Communities Impact Assessment violates statutory duties under the Islands (Scotland) Act 2018, while the failure to provide a complete Social Impact Assessment is a

significant oversight. These inadequacies obstruct the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

In direct violation of National Planning Framework 4, the proposal fails to demonstrate adequate protection for biodiversity, natural spaces, and cultural heritage. There is no evidence that health and wellbeing impacts are acceptable, nor is there a demonstrated net economic benefit due to the lack of tourism impact modelling. The cumulative impacts from both offshore and onshore components have not been sufficiently evaluated, clouding the understanding of effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties surrounding environmental risks persist and may be significant. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and occasionally inconsistent. The evidential threshold needed to eliminate adverse effects beyond reasonable scientific doubt remains unmet, thereby activating the precautionary principle and preventing a lawful conclusion regarding the acceptability of the impacts.

Moreover, the proposal would lead to considerable and irreversible changes to a sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, and the disruption of cultural and visual relationships, alongside tourism impacts, signify permanent effects that cannot be mitigated adequately.

When considering all these factors, the application proves to be procedurally and substantively unfit for determination. The combination of information deficiencies, policy conflicts, and unresolved environmental risks obstructs a lawful, evidence-based decision. Therefore, it is imperative that the competent authority either refuse consent on these grounds or invoke the appropriate regulatory provisions to compel the submission of the necessary missing information.

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

Member of Public 257

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 marine licensing and Environmental Impact Assessment regulations. The objection arises from a review of the Environmental Impact Assessment Report and its supporting documents, highlighting significant planning, environmental, cultural, and procedural shortcomings. 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 regarding the scale, proximity, and design of the proposal suggest it may not comply with statutory requirements, national policy, or sustainable development principles.

The application lacks a sufficient evidential basis for a lawful determination. It is notable that critical environmental data is absent, baseline information is inconsistent and limited, and essential elements of the proposal remain unspecified. The employment of a flexible design framework obscures a clear understanding of potential significant effects, while the reliance on unspecified mitigation measures makes it impossible to evaluate their effectiveness. Consequently, the documentation does not provide a comprehensive understanding of the environmental, cultural, or community impacts, and claims regarding negligible or non-significant effects lack robust evidence.

There are also significant policy conflicts. The proposal seems to contradict the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not prove that it can meet national mandates to protect biodiversity, climate interests, and environmental integrity. These conflicts challenge the statutory tests required for consent and hinder the competent authority's capacity to determine the proposal's acceptability in policy terms.

The unprecedented scale of the proposal, with large turbines positioned near the shoreline, raises serious concerns about landscape capacity, visual dominance, and environmental impact. In light of the lack of adequate information, the dependence on undefined mitigation, evidential weaknesses, and clear non-compliance with policy, it is evident that the application is incomplete and cannot support a lawful determination. Therefore, the precautionary principle must apply in these circumstances.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The proposal seeks consent based on an Environmental Impact Assessment Report that is fundamentally flawed. The report lacks a complete, transparent, and reliable assessment of the potential environmental effects associated with the development. A flexible Project Design Envelope has been employed, which does not commit to specific turbine dimensions, layouts, or configurations. This approach introduces considerable uncertainty and hampers a thorough worst-case scenario analysis. Consequently, the integrity of the assessment is compromised, preventing both the public and the competent authority from fully grasping the true environmental impacts that may arise from the final development.

Moreover, the application heavily depends on mitigation measures, monitoring strategies, and management plans that have yet to be established. Seeking consent on the premise that environmental harm will be addressed in the future obstructs any meaningful evaluation of these measures or an 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 stipulates that significant effects and mitigation must be thoroughly outlined before a decision is made.

Significant evidential deficiencies are present, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. Such shortcomings lead to uncertainty about the scale and significance of impacts, especially where conclusions of negligible or non-significant effects lack robust supporting data. The insufficient information impedes a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot align with statutory obligations.

As a result, the application does not satisfy the evidential threshold mandated by the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal fails to comply with National Planning Framework 4, including biodiversity protection and environmental integrity requirements, as it is not demonstrated that impacts have been comprehensively assessed or that suitable safeguards exist.

In summary, the reliance on an undefined design envelope, the lack of specified mitigation, and the gaps in baseline data contribute to the unreliability and incompleteness of the Environmental Impact Assessment Report. These shortcomings hinder a lawful and rigorous evaluation of environmental effects, leaving the competent authority without the necessary information to make a well-informed decision regarding the application.

MARINE ECOLOGY AND PROTECTED SPECIES

The application presents a significant deficiency in the assessment of marine ecology and protected species, failing to provide a thorough understanding of the ecological receptors in the West Lewis coastal environment. This area is not only biologically active but also highly sensitive, yet the baseline data remains incomplete. Furthermore, the methodologies employed do not effectively capture the presence, behaviour, or habitat use of various species, which undermines the reliability of the assessment's conclusions regarding potential impacts.

One critical area of concern is the treatment of otters, a species protected under European law. The application neglects to adequately acknowledge or evaluate their active use of coastal regions for foraging and movement. This oversight means that the effects of construction disturbances, noise, and increased activity on their core foraging areas have not been properly assessed, leading to a misrepresentation of potential significant impacts on this species.

Similarly, the assessment of basking sharks is compromised by an overreliance on aerial surveys, which introduces considerable detection bias, particularly in the challenging Atlantic conditions. This methodological choice is likely to result in an underestimation of their presence, especially when contrasted with the more reliable land-based observations that indicate these waters are frequently used by basking sharks. By failing to adequately incorporate or consider such vital data, the assessment falls short, resulting in an incomplete baseline.

These methodological flaws mean that any conclusions drawn about negligible or non-significant effects are based on assumptions rather than solid evidence. The lack of robust baseline data impedes a meaningful assessment of cumulative and indirect impacts, including those related to seasonal changes and broader ecosystem interactions. This leaves considerable uncertainty regarding the actual risks faced by marine species and habitats.

From a regulatory standpoint, the application does not comply with the requirements set forth in the Environmental Impact Assessment regime and the National Planning Framework 4, as it has not properly identified or assessed the protected species in the area. The uncertainties raised prevent a definitive exclusion of adverse effects, necessitating the application of the precautionary principle. In light of these issues, consent cannot be lawfully granted.

In summary, the assessment is rendered unreliable due to incomplete baseline data, flawed methodologies, and unsupported conclusions. These deficiencies hinder a

thorough evaluation of the impacts on marine ecology and protected species, thereby indicating that the application lacks a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application contains significant flaws in the ornithological assessment, which features gaps in evidence and inconsistencies that undermine its findings. It is critical to note that the west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already declining. However, the application does not satisfactorily demonstrate that these species will remain unaffected by the proposed development. The development site is situated in key foraging areas and migratory pathways, yet the assessment fails to thoroughly evaluate the risks of displacement, collision, or habitat loss.

A core contradiction arises within the application, where the developer asserts there will be no significant adverse effects while also putting forth a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This inconsistency raises concerns about the validity of the assessment and suggests that the conclusions drawn are not backed by adequate evidence. The report lacks sufficient evidence to confirm that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will not be affected. The significance of these vital feeding grounds is not fully recognised, and the reliance on modelling methods introduces uncertainty, especially for species experiencing severe declines, like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, particularly where baseline data is lacking and behavioural responses are not well understood.

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

From a regulatory standpoint, the application does not meet the evidential standard necessary 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 triggers the precautionary principle and obstructs a lawful conclusion in favour of consent.

Moreover, the identified deficiencies reflect a failure to comply with National Planning Framework 4 concerning biodiversity protection and the preservation of natural assets. The inability to demonstrate that internationally significant seabird populations will not

be adversely affected directly conflicts with national policy. Collectively, these issues render the assessment unreliable due to inconsistencies, methodological flaws, and inadequate 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.

CONSTRUCTION AND POLLUTION RISKS

The evaluation of construction and pollution risks related to the proposal is severely lacking in detail, which hinders a proper assessment of its likely environmental impacts. Significant seabed preparation and installation are planned within a high-energy Atlantic environment, yet the absence of fully developed Construction Environmental Management Plans and Pollution Prevention Plans is notable. Instead, the application relies on mitigation and contingency measures that are to be created after consent is granted, limiting any meaningful assessment of their sufficiency or effectiveness beforehand.

This reliance on unspecified future measures is particularly alarming, considering the sensitivity of the surrounding environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are at risk from 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 adequate details on how these risks will be prevented, managed, or monitored.

There is significant uncertainty regarding the size and behaviour of sediment plumes that might result from seabed disturbance and cable installation. Without comprehensive modelling and well-defined management strategies in place, it is 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 context.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent, the application removes the opportunity to evaluate whether adequate measures are in place to address pollution events, thus introducing procedural risk. This situation undermines the competent authority's ability to assess the environmental protection measures effectively at the point of decision-making.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation strategies are assessed before

consent can be granted. The application does not adequately demonstrate compliance with policy requirements related to environmental protection and water quality.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal's failure to assess the impact of artificial lighting on dark skies and nocturnal wildlife represents a significant gap in the Environmental Impact Assessment. The West Lewis coastline features exceptionally dark skies, which are vital for the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting, visible from great distances, would create an intrusive "wall of light" effect that would drastically change the night-time environment.

There is no evaluation of how this lighting would affect visual amenity, landscape character, or the experiences of residents and visitors, despite the importance of dark skies to the identity of the area and the burgeoning sector of astro-tourism. This omission creates a clear deficiency in the overall landscape and environmental assessment.

Moreover, there is a troubling lack of consideration for nocturnal wildlife impacts. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to phototaxis, which can lead to disorientation and a heightened risk of collisions. The application does not provide any assessment of lighting impacts or conduct a phototaxis study, failing to explore how the proposed aviation lighting might adversely affect these species or contribute to increased mortality rates.

This shortcoming is aggravated by the reliance on daytime survey data in the ornithological assessment, which overlooks nocturnal activity and its associated dangers. Kittiwakes, for example, may forage or migrate at night and are also susceptible to disorientation from artificial lighting, yet this risk remains unexamined. The absence of site-specific night-time data leaves a critical void in understanding the ecological impacts involved.

Without a thorough assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would suffer adverse effects. The evidential standard required to rule out adverse effects beyond reasonable scientific

doubt cannot be achieved, invoking the precautionary principle and precluding a lawful determination.

From a policy standpoint, this omission contravenes National Planning Framework 4 regarding the protection of natural places and environmental quality. Furthermore, it undermines the comprehensive assessment of landscape and seascape impacts, as the character of night-time environments is an integral aspect of the overall environment.

In summary, the lack of assessment regarding dark skies and nocturnal wildlife is 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.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal does not meet the requirements for sustainable development when evaluated against statutory duties, national policy, and evidential standards. The application brings forth the same core issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. Now, it is being presented under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant gaps in the application's evidential basis. It lacks complete baseline data and continues to utilise an undefined design envelope. Additionally, it relies on unspecified mitigation measures and fails to address key impact pathways, such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism. The Environmental Impact Assessment is incomplete, which hinders a comprehensive understanding of potential significant effects or residual impacts.

Procedural failures are also evident. The absence of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the failure to provide a full Social Impact Assessment is a notable omission. These issues obstruct the competent authority from properly evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal conflicts with National Planning Framework 4. It fails to ensure the protection of biodiversity, natural places, and cultural heritage, does not establish that health and wellbeing impacts are acceptable, and lacks evidence of net economic benefit due to the absence of tourism impact modelling. The cumulative impacts of

both offshore and onshore elements have not been thoroughly 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 inconsistent. The evidential threshold necessary to dismiss adverse effects beyond reasonable scientific doubt has not been met, thus invoking the precautionary principle and precluding a lawful conclusion regarding acceptable impacts.

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 impacts on tourism represent permanent effects that cannot be mitigated adequately.

In summary, the application is procedurally and substantively unfit for determination. The significant information deficiencies, along with conflicts in policy and unresolved environmental risks, obstruct the possibility of a lawful and evidence-based decision. The competent authority must refuse consent on these grounds or invoke the appropriate 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 writing to express my strong objection to the proposed N4 Spiorad na Mara wind farm on the shores of Eilean mo Ghaoil.

As an artist deeply engaged with landscape, material, and ecological sensitivity, I value places where cultural identity and natural environments are inseparable. This coastline represents not only a fragile ecosystem, but also a living cultural landscape shaped by history, language, and community memory.

The scale and industrial nature of this development would irreversibly alter the character of the seascape, disrupting both marine life and the visual and emotional relationship people have with this place. Once changed, this cannot be restored.

I believe that renewable energy must be pursued responsibly, with full respect for local ecosystems and communities. In this case, the proposal risks causing disproportionate harm to a unique and irreplaceable environment.

For these reasons, I urge the Marine Directorate to reject this proposal.

Member of Public 258

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 in accordance with marine licensing and Environmental Impact Assessment requirements. The basis of this objection arises from a thorough review of the Environmental Impact Assessment Report and associated documents, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, a region celebrated for its Atlantic-facing coastline, nearly unspoiled environment, and rich cultural heritage. The size, location, and design of the wind farm present serious issues regarding their compliance with statutory obligations, national policies, and the overarching principles of sustainable development.

The application is fundamentally flawed due to its failure to present sufficient evidence for a lawful decision. Notably, essential environmental data is absent, baseline information provided is limited and inconsistent, and crucial elements of the proposal lack clear definition. The flexible design framework used raises doubts about the understanding of significant impacts, while the reliance on unspecified mitigation strategies hampers any assessment of their potential effectiveness. Consequently, the documentation does not facilitate a comprehensive understanding of the environmental, cultural, or community effects, and assertions of negligible or insignificant impacts lack credible substantiation.

Additionally, the application reveals substantial conflicts with established policy. It appears to contradict the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, especially concerning biodiversity, natural environments, cultural heritage, and public health. There is no evidence to demonstrate that national obligations regarding the protection of biodiversity, climate considerations, and environmental integrity can be fulfilled. These inconsistencies directly affect the statutory tests necessary for consent, thereby compromising the capability of the competent authority to deem the development acceptable from a policy standpoint.

The unprecedented scale of the proposed development raises further concerns, with large turbines positioned unnervingly close to the shore, leading to significant worries about landscape capacity, visual impact, and environmental consequences. In light of

the lack of adequate information, reliance on undefined mitigation measures, evidential shortcomings, and clear policy non-compliance, it is evident that the application is incomplete and does not support a lawful decision. Under these circumstances, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report exhibits considerable deficiencies, failing to offer a thorough, transparent, or trustworthy overview of the potential environmental effects of the proposal. A significant concern is the flexible Project Design Envelope, which lacks specific commitments to turbine dimensions, layouts, or configurations. This introduces substantial uncertainty and hampers the ability to apply a worst-case scenario consistently. Consequently, the integrity of the assessment is compromised, and the impacts reported may not accurately represent the development that is ultimately constructed. This lack of clarity prevents both the public and the competent authority from fully grasping the true extent of the environmental effects.

Furthermore, the application is heavily reliant on mitigation measures, monitoring strategies, and management plans that have yet to be defined. As a result, consent is sought on the premise that any environmental harm will be rectified at a later stage. This approach obstructs any meaningful evaluation of the effectiveness of these measures or the assessment of residual impacts. The deferral of critical information to post-consent stages is procedurally unacceptable and contravenes the intent of the Environmental Impact Assessment framework, which mandates that likely significant effects and their mitigation must be clearly established before determination.

There are also notable evidential weaknesses, which include significant gaps in baseline data and limitations in the methodology, relying instead on assumptions rather than site-specific evidence. This leads to uncertainty surrounding the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are drawn without robust supporting data. The lack of adequate information hinders a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that is incompatible with statutory requirements.

Consequently, the application does not satisfy the evidential threshold mandated under the Habitats Regulations, as it fails to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly in relation to protected species and sensitive habitats. The proposal also does not demonstrate compliance with National Planning Framework 4, notably concerning biodiversity protection and environmental integrity, since it cannot be established that impacts have been thoroughly assessed or that appropriate safeguards are in place.

In conclusion, the combination of reliance on an undefined design envelope, the absence of specified mitigation strategies, and the gaps in baseline data culminate in an Environmental Impact Assessment Report that is both unreliable and incomplete. These deficiencies obstruct a lawful and robust evaluation of environmental effects, leaving the competent authority unable to make an informed decision based on the information supplied.

ASSESSMENT OF ALTERNATIVES

The application presents significant shortcomings in its assessment of alternatives, failing to adhere to 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 submission provides a narrative on project evolution. This method does not adequately demonstrate that less harmful options have been properly identified, assessed, and preferred over more damaging solutions.

Furthermore, there is a lack of transparent and evidence-based comparison regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not illustrate that the developer has adequately considered positioning turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be diminished. Given the sensitivity of the West Lewis coastline and the critical role that proximity to shore plays in determining impact, the failure to include such an analysis precludes any conclusion that the proposed siting is the least damaging option.

This inadequacy extends to the assessment of cable routing and landfall, where there is insufficient evidence indicating that alternative routes have been thoroughly explored to mitigate impacts on sensitive receptors, including culturally and spiritually significant sites like Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis highlight that the principle of mitigation by design has not been implemented, resulting in an over-reliance on post-design mitigation measures.

Consequently, the application does not demonstrate 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, which hampers the ability of the competent authority to ascertain whether less harmful and more suitable alternatives are available. Without a thorough assessment of alternatives, it cannot be confidently stated that the proposal is sustainable or compliant with relevant policy.

From a policy standpoint, these deficiencies significantly undermine adherence to

National Planning Framework 4, particularly regarding the protection of natural areas, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment constitutes a critical omission, contributing to the overall conclusion that the application has not been sufficiently evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed development raises significant concerns regarding the assessment of marine ecology and protected species, which is notably deficient and fails to deliver a comprehensive or reliable understanding of the ecological receptors present in the West Lewis coastal environment. This marine system is recognised as being highly sensitive and biologically active, yet the baseline data gathered is inadequate, and the methodologies employed do not effectively capture essential information on species presence, behaviour, and habitat utilisation. Consequently, the assessment does not provide a solid evidential foundation for evaluating potential impacts.

A critical shortfall in the assessment relates to otters, a European Protected Species. The application does not sufficiently acknowledge or evaluate their active use of coastal areas for foraging and movement. The omission of their core foraging range and behavioural patterns means that the assessment does not adequately consider the potential impacts of construction disturbance, noise, and increased activity. This lack of thorough analysis compromises the conclusions drawn regarding the absence of significant effects on this species.

Moreover, there are further shortcomings in the assessment of basking sharks, particularly due to an overreliance on aerial surveys, which creates significant detection bias, especially in Atlantic conditions. This method is likely to underestimate the presence of basking sharks when compared to established land-based observations that indicate these waters are used frequently. The failure to incorporate or properly consider such data leads to an incomplete baseline and diminishes the reliability of the conclusions reached.

These methodological shortcomings result in claims of negligible or non-significant effects being founded on assumptions rather than solid evidence. The lack of adequate baseline data also hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty about the actual scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements set by 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 introduced prevents the clear exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. In light of these factors, consent cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These deficiencies inhibit a robust evaluation of impacts on marine ecology and protected species, underscoring the overarching conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application proposes the development of turbines situated within a key migratory corridor on the west coast of the Isle of Lewis, an area that is home to internationally significant seabird populations, many of which are already experiencing decline. However, the ornithological assessment associated with this application is fundamentally flawed, containing significant gaps in evidence and internal inconsistencies that compromise its conclusions. The assessment fails to adequately demonstrate that these seabird species will not be adversely affected, particularly regarding important foraging areas and migratory pathways. It does not sufficiently evaluate the risks associated with displacement, collision, or habitat loss.

A notable contradiction arises within the application, as the developer asserts that there will be no significant adverse effects while simultaneously pursuing 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, suggesting that the conclusions drawn are not supported by the underlying evidence. Additionally, the assessment lacks adequate evidence to confirm that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The crucial significance of these feeding grounds is not fully acknowledged, and the reliance on modelling methods creates uncertainty, particularly for species facing severe decline, such as Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality rates, especially given the incomplete baseline data and insufficient understanding of behavioural responses.

Moreover, the positioning of turbines within a recognised migratory corridor introduces an additional and substantial risk, effectively acting as a barrier within a primary flight path for species migrating between the United Kingdom and Iceland. The application fails to thoroughly assess the long-term implications of ongoing mortality within this corridor or the potential impact on species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential standard

required to ascertain no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, alongside data deficiencies and modelling constraints, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation engages the precautionary principle and prevents a lawful conclusion in favour of consent.

The identified deficiencies further reflect non-compliance with National Planning Framework 4 regarding biodiversity protection and the preservation 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 lack of sufficient evidence. These shortcomings inhibit a thorough evaluation of potential impacts and contribute to the conclusion that the application fails to meet the statutory requirements necessary for a favourable determination.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency in the assessment of social impacts, health, and wellbeing represents a significant concern and undermines the lawful evaluation of the proposal. The developer commissioned a Social Impact Assessment, including focus groups with local residents, yet has not published the full report. This has resulted in a substantial evidential gap that prevents both the public and the competent authority from fully understanding the social risks identified in the developer's own research.

Residents are already reporting measurable stress, anxiety, and concern regarding the scale and proximity of the proposal, with these impacts arising from direct engagement rather than speculation. However, the inability to access the complete assessment hampers proper scrutiny of the findings and restricts the capacity to evaluate their significance within the decision-making process.

Moreover, there are indications that the proposal is viewed as a direct threat to community identity and cohesion, with references to "cultural loss" appearing in the developer's findings. Despite this, such impacts have not been adequately integrated 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. It is crucial to obtain a complete understanding of social, economic, and health impacts for developments of this scale, particularly when community character and functioning may be at stake. The application fails to provide a complete evidential basis for assessing the balance between benefits and harms due to the absence of the

full dataset.

From a policy perspective, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Development should promote positive health outcomes and avoid harm; however, the available evidence indicates existing adverse effects that have not been fully disclosed. Without the complete assessment, demonstrating compliance with this policy is not possible.

The procedural implications are considerable. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This is a material omission within the application and signifies a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, alongside evidence of existing adverse impacts, renders the assessment both incomplete and unreliable. This situation prevents a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal's assessment of visual, seascape, and landscape impacts is severely lacking, failing to capture both the extent of change and the sensitivity of the environment. The West Lewis coastline is characterised by its unspoilt Atlantic horizon, which contributes to its undeveloped nature and profound sense of remoteness. The planned installation of large-scale turbines near the shoreline would result in a continuous industrial presence that would fundamentally change this character, leading to a permanent and irreversible transformation of the landscape.

The application inadequately addresses the magnitude of visual change that would occur. Due to their scale and proximity, the turbines would overpower views from residential areas, historic sites, and popular coastal locations, thus directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. This significant impact has not been properly conveyed, which is particularly concerning given the sensitivity of the landscape in question.

Methodological issues are evident in the selection and presentation of visual viewpoints. There is evidence indicating that these viewpoints may not adequately reflect the most sensitive receptors or potential worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the risk of underestimating the visual impact, thereby compromising the assessment's reliability.

Additionally, the assessment neglects to consider the interconnectedness of the landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments are linked to the broader landscape by visual and spatial relationships with the Atlantic horizon. The evaluation incorrectly treats these assets as isolated, failing to recognise their interdependence, which results in an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape threatens to sever these vital connections, altering the context in which heritage assets are experienced and disrupting their relationship to the natural horizon. This signifies not only a visual impact but also a broader cultural and spatial detriment that has not been thoroughly assessed within the application.

From a policy standpoint, the proposal directly contravenes the National Planning Framework 4 regarding the safeguarding of natural places and historic assets. The anticipated scale of change is incompatible with the mandate to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case scenario assessment further weakens any assertions of policy compliance.

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

In conclusion, the assessment is inadequate in representing the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These deficiencies hinder a reliable evaluation and reinforce the position that the proposal is incompatible with the preservation 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, making it impossible to properly evaluate likely environmental effects. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans provided. Instead, the application relies on mitigation and contingency measures to be created after consent, which hampers any meaningful assessment of their potential adequacy or effectiveness.

This approach raises serious concerns, particularly considering the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and

crucial habitats that are at risk from sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate information on how these issues will be prevented, controlled, or monitored.

Moreover, there is uncertainty about the scale and behaviour of sediment plumes that may result from the disturbance of the seabed and cable installation. Without robust modelling and well-defined management strategies, it remains impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty is further amplified when considering potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment.

The absence of detailed emergency response procedures adds to the risks involved. By postponing the planning of contingency measures until after consent is granted, the application obstructs any evaluation of whether adequate safeguards are in place for responding to pollution incidents. This not only introduces procedural risks but also undermines the competent authority's ability to assess environmental protection measures during the decision-making process.

Regulatory requirements mandate that significant effects and mitigation must be thoroughly assessed prior to granting consent, and the deferral of critical environmental safeguards contradicts these requirements. The application does not demonstrate compliance with policies regarding environmental protection and water quality.

Collectively, the lack of defined mitigation measures, insufficient management plans, and uncertainties about potential impacts render the assessment materially deficient. These issues inhibit a robust evaluation of construction and pollution risks and reinforce 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, yet the application related to this development lacks a thorough assessment of its ecological and socio-economic impacts. A critical flaw is the presumption that fishing activities can be relocated without repercussions. There is no evidence presented that alternative fishing grounds are available, easily accessible, or capable of withstanding additional fishing pressure. This significant gap raises concerns over potential overfishing in other areas, which could adversely affect the local fishing fleet's economic stability. The absence of a clear, evidence-based evaluation makes it impossible to fully understand the implications for fisheries and local livelihoods.

Furthermore, the proposal poses considerable risks to marine species, particularly due to the underwater noise produced during construction activities. The use of high-energy hammer piling for prolonged periods is expected to disturb marine life across extensive areas, impacting species such as dolphins. The predicted disturbance to a considerable portion of the local bottlenose dolphin population is alarming, yet the application minimises these concerns without adequate supporting evidence.

Additionally, there is a notable inconsistency in the application regarding the need for licenses to permit harm to European Protected Species, which is acknowledged while simultaneously stating that the impacts are negligible. This contradiction undermines the assessment's credibility and raises compliance issues with the Habitats Regulations, particularly when anticipating harm that necessitates legal authorisation. The assessment further fails to consider cumulative impacts from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a comprehensive analysis of these compounded effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not align with the requirements of the National Planning Framework 4 or the National Marine Plan. It does not demonstrate how the development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, thus precluding any assertion that the proposal constitutes sustainable development. Collectively, the inadequacies surrounding evidence on fishing displacement, the underestimation of acoustic impacts, and the inconsistencies within the assessment highlight its incompleteness and unreliability, obstructing a thorough evaluation of the implications for marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application raises substantial concerns regarding the integrity of its assessment, particularly in relation to the onshore infrastructure, which remains materially incomplete. This approach treats the offshore turbines and onshore works as separate entities, which obscures the full scope of the environmental and socio-economic effects associated with what is fundamentally a single integrated project.

One of the critical components of the onshore works involves the routing of cabling across protected moorland and the construction of a substation in proximity to Stornoway. This activity necessitates excavation across areas rich in deep peat, notably within Barvas Moor, an ecologically sensitive habitat that serves as a significant carbon store. However, the application fails to provide a thorough assessment of these impacts, thereby inhibiting a complete understanding of the project's environmental footprint.

The omission or postponement of onshore impact assessments results in an inability to accurately evaluate cumulative effects. The Environmental Impact Assessment process mandates that all project components be assessed together; yet, the current separation of offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities remain inadequately understood.

Moreover, there are notable risks posed to sensitive habitats, including machair systems and peatland environments, which receive policy protection. The application does not sufficiently demonstrate that the impacts on these habitats have been thoroughly evaluated or that appropriate avoidance measures have been implemented. This deficiency signifies a significant evidential gap in terms of biodiversity protection.

The proposal also raises important issues related to carbon balance. The disturbance of peatland can lead to the release of stored carbon, potentially creating a carbon debt that contradicts the fundamental goals of renewable energy development. The application does not sufficiently address this concern or prove that the overall carbon balance remains advantageous.

Additionally, the routing of infrastructure through active croft land presents potential conflicts with existing land use and legal rights. The application lacks evidence that the necessary consents or processes have been initiated, which raises doubts about the project's deliverability and lawful implementation.

From a policy perspective, the failure to assess the project comprehensively and to demonstrate protection for 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 compromises the integrity of 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 collectively render this part of the application incomplete and unreliable, ultimately hindering lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is notable for its exceptionally dark skies, which contribute significantly to the area's environmental quality, cultural identity, and tourism value. However, the assessment of dark skies and nocturnal wildlife is entirely missing from the Environmental Impact Assessment, representing a material omission. The proposal introduces permanent red aviation lighting that is visible over long distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon,

fundamentally changing the night-time environment.

The application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This lack of assessment is particularly concerning given the importance of dark skies to the area's identity and the growth of emerging tourism sectors, such as astro-tourism. Such omissions create significant gaps in the overall landscape and environmental assessment.

Furthermore, there is no evaluation of 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 phototaxis, which may cause disorientation and increase the risk of collision. The application does not provide a lighting impact assessment or a phototaxis study, thereby neglecting to assess how the aviation lighting could affect these species or potentially increase mortality rates.

The reliance on daytime survey data within the ornithological assessment further compounds this oversight, as it does not account for nocturnal activity or associated risks. Kittiwakes, for instance, may forage or migrate at night and are also vulnerable to disorientation from artificial lighting; yet, this risk remains unassessed. The absence of site-specific night-time data creates a critical gap in understanding ecological impacts.

In the absence of an evaluation of nocturnal impacts, it becomes impossible to ascertain whether protected species or designated sites would suffer adverse effects. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, which invokes the precautionary principle and prevents a lawful determination.

From a policy standpoint, this omission conflicts with National Planning Framework 4 concerning the protection of natural places and environmental quality. It also undermines the broader assessment of landscape and seascape impacts since night-time character is an integral aspect of the environment.

Overall, the lack of any assessment of dark skies and nocturnal wildlife constitutes a substantial 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 proposed development fails to adequately assess the impacts on tourism, which is a crucial part 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 notes that 86% of visitors are attracted by the scenery, it does not provide a detailed evaluation of how large-scale offshore infrastructure would influence visitor numbers, behaviour, or overall economic contribution.

Tourism on the island has seen significant 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 local economy. The application neglects to analyse how the industrialisation of the seascape and a decline in environmental quality would affect Tourism Gross Value Added or the economic resilience of the area. Without this analysis, it is impossible to determine if the development would provide a net economic benefit or harm this vital and growing sector.

Furthermore, the assessment overlooks the critical role that environmental quality plays in attracting tourists, particularly the significance of unspoiled landscapes and dark skies for visitor experiences. The absence of a Dark Skies Assessment adds to this shortcoming, leaving a considerable gap in understanding the effects on nature-based tourism and astro-tourism, which are emerging markets in the area.

In a community with limited economic diversity, not evaluating the impacts on tourism carries broader implications for employment, local businesses, and overall community sustainability. The lack of a proper Island Communities Impact Assessment means these economic vulnerabilities have not been examined as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not show compliance with National Planning Framework 4, particularly regarding economic impact and the need to demonstrate net benefit. It conflicts with strategic goals that prioritise tourism as a growth sector and fails to provide sufficient evidence for a competent authority to evaluate the economic consequences of the proposal.

Collectively, the inability to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and acknowledge the island's economic dependency leads to a significant gap in evidence. This deficiency hampers a thorough evaluation of economic effects and suggests that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm raises serious concerns about its alignment with sustainable development principles as outlined in statutory duties, national policy, and evidential standards. It mirrors the issues that led to the 2008 rejection of the Lewis Wind Power proposal, where the extent of industrialisation was deemed unacceptable. Despite being presented within a stronger policy framework

that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, the proposal falls short.

Critical gaps in baseline data undermine the evidential basis for decision-making. The reliance on an undefined design envelope, unspecified mitigation measures, and the failure to consider significant impact pathways such as nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects leave the Environmental Impact Assessment incomplete. This lack of thoroughness prevents an understanding of likely significant effects or residual impacts.

Moreover, there are evident procedural shortcomings. The failure to conduct a compliant Island Communities Impact Assessment contravenes statutory duties under the Islands (Scotland) Act 2018, while the non-disclosure of the full Social Impact Assessment is a material omission. These deficiencies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for consideration.

The proposal directly contradicts National Planning Framework 4, as it does not adequately protect biodiversity, natural places, and cultural heritage. It fails to establish that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, primarily due to the absence of tourism impact modelling. Furthermore, the cumulative effects of both offshore and onshore components have not been thoroughly evaluated, masking impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. Incomplete assessments concerning marine ecology, seabirds, protected species, and marine mammals, along with internal inconsistencies, indicate that the evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved. This engages the precautionary principle, thereby preventing a lawful conclusion regarding the acceptability of impacts.

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, the disruption of cultural and visual relationships, and the negative impacts on tourism represent permanent consequences that cannot be effectively mitigated.

In conclusion, the application is fundamentally unfit for determination, both procedurally and substantively. The significant information deficiencies, coupled with policy conflicts and unresolved environmental risks, obstruct a lawful and evidence-based decision-making process. Therefore, it is requested that consent for the Spiorad na Mara Offshore Wind Farm application is refused in its entirety.

Additional Comments

I see zero benefit to islanders from this project. It will be short term employment, most of which will be off island. Once the turbines are built and operational then most jobs will go and even then it will probably be people from the mainland that maintain them.

Islanders will not benefit from lower electricity costs but will put up with all the disruption, inconvenience and damage to our beautiful island.

I regularly look out for the northern lights. Our views of this will be destroyed or greatly reduced by having the flashing lights and huge towers visible.

Wildlife will be disrupted and possible killed by the turbines when in use and during the construction of the bases they stand on.

The turbines are too tall for the distance they are to be placed from shore. They will be visible for miles around and destroy the views we currently have

The only people to benefit are the people who will be raking in the cash, not islanders that's for sure.

Why would tourists want to come to the west side to see what will be left of our environment and wild life. I wouldn't wish to spend money on a holiday to visit an island filled with wind turbines. Income from tourists will be damage by this development.

I'm sure there are many more reason for now allowing this to go ahead but above is just some.

Member of Public 259

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 is fundamentally flawed, failing to deliver a comprehensive, transparent, or dependable account of the potential environmental effects associated with the proposal. The introduction of a flexible Project Design Envelope, which lacks commitment to specific dimensions, layouts, or configurations for turbines, creates considerable uncertainty. This ambiguity obstructs a consistent assessment of worst-case scenarios, compromising the integrity of the evaluation and preventing both the public and the competent authority from fully grasping the true scale of environmental effects that may arise from the development.

Moreover, the application places undue reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent on the premise that environmental harm will be rectified at a later stage hinders any substantial appraisal of the effectiveness of these measures or the assessment of residual impacts. Deferring essential information to post-consent phases is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which necessitates that likely significant effects and mitigation strategies are clearly identified before any determination is made.

There are also critical evidential shortcomings, characterised by gaps in baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. This leads to uncertainty regarding the magnitude and significance of impacts, particularly in cases where conclusions of negligible or non-significant effects are asserted without robust supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that is incompatible with statutory obligations.

As a result, the application does not fulfil the evidential threshold mandated by the Habitats Regulations, which is essential to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not conform to the requirements outlined in National Planning Framework 4, particularly those related to biodiversity protection and environmental integrity, as it fails to establish that impacts have been adequately assessed or that suitable safeguards are in place.

In summary, the combination of an undefined design envelope, unspecified mitigation measures, and significant gaps in baseline data renders the Environmental Impact

Assessment Report unreliable and incomplete. These deficiencies impede a lawful and thorough evaluation of environmental effects, leaving the competent authority unable to make an informed decision based on the information presented.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally inadequate, failing to deliver a complete and reliable understanding of the ecological receptors in the West Lewis coastal environment. This region, known for its sensitivity and biological activity, is not well represented in the baseline data gathered. The methodologies employed do not effectively capture the presence, behaviour, and habitat usage of key species, which compromises the validity of the impact evaluations.

One glaring oversight is the treatment of otters, a species protected under European law. The application neglects to properly identify and assess their active use of coastal areas for foraging and movement. The failure to consider their core foraging range and behavioural habits means that the potential impacts of construction disturbance, noise, and increased activity remain inadequately evaluated. This omission significantly undermines claims regarding the absence of significant effects on otters.

Moreover, the assessment of basking sharks suffers from methodological flaws, particularly due to the reliance on aerial surveys that are prone to significant detection bias, especially under Atlantic conditions. This methodology likely results in an underrepresentation of their presence, in stark contrast to established land-based observations which indicate frequent usage of these waters. The disregard for or improper consideration of this crucial data further contributes to an incomplete baseline, compromising the reliability of the conclusions drawn.

These methodological shortcomings lead to conclusions about negligible or non-significant effects being based more on assumptions than on solid evidence. The lack of adequate baseline data obstructs any meaningful evaluation of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. Consequently, this introduces uncertainty regarding the actual risks faced by marine species and habitats.

From a regulatory standpoint, the application does not comply with the Environmental Impact Assessment requirements or the National Planning Framework 4, as it fails to accurately identify or assess protected species. The degree of uncertainty that arises prevents the possibility of ruling out adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. In light of these issues, it is clear that consent cannot be legally granted.

In summary, the combination of inadequate baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These critical deficiencies hinder a robust evaluation of impacts on marine ecology and protected species, culminating in the conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment is fundamentally flawed, containing significant evidence gaps and internal inconsistencies that compromise its conclusions. The application does not adequately demonstrate, to the necessary evidential standard, that the internationally important seabird populations on the west coast of the Isle of Lewis, many of which are already in decline, will not be adversely affected. This development is situated within crucial foraging areas and migratory pathways, yet the assessment fails to thoroughly evaluate the potential implications of displacement, collision risk, or habitat loss.

There is a critical contradiction within the application; the developer asserts there will be no significant adverse effects while also proposing a Habitats Regulations derogation case, which is applicable only when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment, suggesting that the conclusions presented lack support from the evidence on which they are based. The evidence provided does not sufficiently establish that seabirds connected to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is inadequately acknowledged, and the reliance on modelling introduces uncertainty, particularly for species experiencing severe declines like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, especially where baseline data is lacking and behavioural responses are not fully understood.

The placement of turbines within a recognised migratory corridor poses an additional and serious risk, effectively creating a barrier in a primary flight path utilised by species travelling between the United Kingdom and Iceland. The application does not sufficiently assess the long-term effects of ongoing mortality in this corridor or the potential consequences for species with relatively small 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, along with data deficiencies and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been satisfied. This invokes the precautionary principle, preventing a lawful conclusion in favour of consent.

These identified deficiencies also signify 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.

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The absence of the full Social Impact Assessment significantly compromises the evaluation of social impacts, health, and wellbeing associated with the proposal. Although the developer engaged local residents through focus groups and commissioned a Social Impact Assessment, the complete report remains unpublished. This lack of transparency creates a notable evidential gap, hindering both public understanding and the competent authority's ability to gauge the social risks identified by the developer's own research.

Residents are reported to be experiencing tangible levels of stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts arise from direct engagement and are therefore based on concrete evidence rather than speculation. However, without access to the entire assessment, there is limited capacity for scrutiny of these findings, which undermines their significance in the decision-making process.

Moreover, the proposal is viewed as a potential threat to community identity and cohesion, with “cultural loss” explicitly mentioned in the developer’s findings. Nonetheless, these critical impacts have not been sufficiently integrated into the primary application or given adequate consideration. The failure to disclose the full Social Impact Assessment obscures the genuine human and social costs tied to the development.

This lack of transparency also detrimentally affects the Environmental Impact Assessment process. For developments of this magnitude, a comprehensive understanding of social, economic, and health implications is vital, especially when the character and functioning of the community may be jeopardised. By withholding complete data, the application falls short of providing an adequate evidential basis to weigh benefits against potential harm.

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4 concerning health and wellbeing. Development projects are expected to facilitate positive health outcomes and mitigate harm; however, the existing evidence suggests adverse effects that have not been fully revealed. In the absence of the complete assessment, the application cannot affirm compliance with this policy.

The procedural implications 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 constitutes a material omission within the application, failing to satisfy the evidential requirements of the Environmental Impact Assessment framework.

In summary, 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 deficiency obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is significantly inadequate and does not properly reflect the scale of change or the sensitivity of the environment. The open Atlantic horizon and undeveloped character of the West Lewis coastline contribute to a strong sense of remoteness. The proposed large-scale turbines located near the shoreline would create an overwhelming industrial presence, fundamentally changing this character and resulting in a permanent transformation of the landscape.

The application fails to accurately represent the extent of visual change. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This dominance would negatively affect visual amenity and diminish the qualities of naturalness and remoteness. The assessment does not properly communicate the significance of these impacts within the context of such a sensitive landscape.

There are also concerns about the methodology used to select and present visual viewpoints. Evidence indicates that these viewpoints may not fully capture the most sensitive receptors or the 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 reliability of the assessment.

Another significant shortcoming is the lack of an evaluation of the interconnected relationship between landscape, seascape, and cultural heritage. The Calanais

Standing Stones and other Scheduled Monuments are part of a broader landscape setting that is visually and spatially linked to the Atlantic horizon. The assessment treats these assets as separate entities, failing to acknowledge their interdependence, which results 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 experienced and breaking their connection to the natural horizon. This represents a broader cultural and spatial harm that has not been adequately assessed in the application, in addition to the visual impact.

From a policy perspective, the proposal is in direct conflict with National Planning Framework 4, particularly concerning the protection of natural spaces and historic assets. The scale of proposed changes is incompatible with the requirement to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case assessment further undermines claims 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 unavoidable. The resulting changes are thus fundamental and permanent, rather than reducible to an acceptable level through mitigation.

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 deficiencies hinder a reliable evaluation and support 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 incomplete, lacking the necessary detail to evaluate likely environmental effects. The application does not provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that would be prepared after consent, which hinders any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures raises serious concerns, particularly given the sensitivity of the receiving environment. The West Lewis coastline features clean coastal waters and important habitats that are at risk from sediment disturbance and contamination. While the application does acknowledge risks such as sediment

mobilisation and accidental chemical or oil spills, it fails to offer sufficient detail on how these risks will be prevented, controlled, or monitored.

Furthermore, 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 is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also extends to potential effects on marine species and habitats identified as sensitive within the broader assessment.

Additionally, the absence of detailed emergency response procedures exacerbates these concerns. By deferring contingency planning to a post-consent stage, the application impedes the evaluation of whether appropriate safeguards are in place to address pollution events. This introduces procedural risk and undermines the competent authority's ability to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation be assessed prior to consent, and the lack of such information renders a lawful determination impossible. The application also fails to demonstrate compliance with policy requirements related to environmental protection and water quality.

Overall, the lack of defined mitigation measures, absence of detailed management plans, and uncertainty regarding potential impacts collectively render the assessment materially deficient. These shortcomings prevent a thorough evaluation of construction and pollution risks, further supporting the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment of marine life and fisheries associated with this application is 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 can be safeguarded from significant disruption.

A major concern is the flawed assumption that fishing activities can be relocated without negative effects. The submission does not provide evidence of alternative fishing grounds that are available, accessible, or capable of sustaining increased pressure. This gap is critical; displacement could lead to overfishing in other areas,

potentially resulting in broader economic repercussions for the local fishing fleet. In the absence of a clear, evidence-based assessment, the implications for fisheries and local livelihoods remain poorly understood.

The proposal also poses considerable threats to marine species, particularly due to the underwater noise generated during the construction phase. The use of high-energy hammer piling over an extended duration is expected to cause disturbances across considerable distances, impacting species like dolphins. The anticipated disruption to a significant portion of the local bottlenose dolphin population raises urgent concerns, yet the application minimises the gravity of these effects without adequate supporting evidence.

Moreover, there exists an inconsistency within the application regarding the requirement for licences to permit harm to European Protected Species while simultaneously describing these impacts as negligible. This contradiction undermines the assessment's credibility and raises questions about compliance with the Habitats Regulations, especially where harm is anticipated to necessitate legal authorisation.

The assessment also neglects to evaluate cumulative impacts resulting from various pressures such as habitat disturbance, noise, and fishing displacement. A comprehensive analysis of these combined effects is essential for determining the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate compliance with National Planning Framework 4 and 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, thereby hindering any conclusion that the proposal constitutes sustainable development.

In summary, the shortcomings in evidence regarding fishing displacement, the underestimation of acoustic impacts, and internal contradictions make the assessment incomplete and unreliable. These deficiencies obstruct a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure associated with this project is significantly deficient and does not adequately consider the comprehensive impacts of what constitutes a single integrated project. The offshore turbines and the onshore works are inherently interconnected, yet they are evaluated independently. This fragmented assessment obscures the true magnitude of environmental and socio-economic consequences.

Onshore elements encompass cabling across protected moorland, the construction of a substation in proximity to Stornoway, and the necessary access infrastructure traversing sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, a critical carbon store and ecologically sensitive environment. The application lacks a thorough assessment of these impacts, which hinders a full understanding of the project's overall environmental footprint.

By omitting or postponing the evaluation of onshore impacts, the application obstructs an appropriate analysis of cumulative effects. The Environmental Impact Assessment process stipulates that all components of a project must be considered collectively. However, the disconnection between offshore and onshore elements results in a failure to fully grasp the combined effects on peatlands, habitats, and local communities.

There are also notable risks to vulnerable habitats, including machair systems and peatland environments that are subject to policy protections. The application does not substantiate that impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, indicating a significant evidential gap in relation to biodiversity conservation.

Concerns also arise regarding the carbon balance associated with the proposal. Disturbance of peatland has the potential to release stored carbon, thereby creating a carbon debt that is at odds with the goals of renewable energy development. The application fails to sufficiently address this matter or to demonstrate that the overall carbon balance remains advantageous.

Moreover, the routing of infrastructure through active croft land presents potential conflicts with established land use and legal rights. The application does not provide adequate evidence that the requisite consents or procedures have been initiated, which raises serious concerns regarding the feasibility and lawful execution of the project.

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 in direct 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 project components, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts render this section of the application incomplete and unreliable, thus hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is noted for its exceptionally dark skies, which are crucial for the area's environmental quality, cultural identity, and tourism value. The proposal introduces permanent red aviation lighting that would be visible over long distances, creating a continuous and intrusive "wall of light" effect across the western horizon and fundamentally altering the night-time environment. The application fails to assess the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This oversight is particularly concerning given the growing significance of dark skies to the local identity and emerging tourism sectors, such as astro-tourism.

Moreover, there is a critical absence of evaluation regarding the impacts on nocturnal wildlife. Species like the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting, which can lead to disorientation and increased risk of collision. The lack of a lighting impact assessment or phototaxis study means that there is no understanding of how the proposed aviation lighting could affect these species or increase mortality rates.

Compounding this issue is the reliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activity or the associated risks. For example, 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 evaluated. The absence of site-specific night-time data creates a critical gap in comprehending ecological impacts.

Without assessing the nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would be adversely affected. The evidential standard required to demonstrate no adverse effects beyond reasonable scientific doubt cannot be met, invoking the precautionary principle and preventing a lawful determination.

From a policy standpoint, the omission conflicts with the National Planning Framework 4, which pertains to the protection of natural places and the preservation of environmental quality. This oversight further undermines the overall assessment of landscape and seascape impacts, as the night-time character is an integral part of the environment.

In conclusion, the absence of any assessment related to dark skies and nocturnal wildlife represents a significant evidential gap. The lack of baseline data, impact

modelling, and species-specific analysis results in an incomplete application that cannot support a lawful determination.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fundamentally fails to meet the requirements of sustainable development when evaluated against statutory duties and national policy. This application echoes the core issues that led to the refusal 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 emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it remains inadequate.

There is a notable lack of a complete and reliable evidential basis for determination. Critical gaps in baseline data persist, and the application relies on an undefined design envelope and unspecified mitigation measures. Key impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism, have been omitted. Consequently, the Environmental Impact Assessment is incomplete, preventing a full understanding of likely significant effects or residual impacts.

Procedural failures are also evident. The absence of a compliant Island Communities Impact Assessment breaches statutory duty under the Islands (Scotland) Act 2018, and the failure to disclose the complete Social Impact Assessment is a material omission. Such deficiencies hinder 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 of biodiversity, natural places, and cultural heritage, fails to show acceptable health and wellbeing impacts, and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative effects of offshore and onshore elements have not been assessed properly, obscuring impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. Assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and obstructing any lawful conclusion about the acceptability of impacts.

Substantial and irreversible changes to a highly sensitive landscape would result from

this proposal. The industrialisation of the Atlantic-facing coastline, loss of dark skies, disruption of cultural and visual relationships, and impacts on tourism represent permanent effects that cannot be adequately mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The significant information deficiencies, alongside policy conflicts and unresolved environmental risks, impede a lawful and evidence-based decision. The competent authority must refuse consent on these grounds or invoke relevant regulatory provisions to require submission of the missing information.

A formal request is therefore made for the refusal of the application for the Spiorad na Mara Offshore Wind Farm in its entirety.

Additional Comments

I am objecting to the windfalls, because I think that they inadequately benefit the island and its communities. This will bring a large number of people to the island which is inadequately equipped to deal with them. The infrastructure is just about coping with the current level of habitation.

This will only add to the pressure for the local hospital, and the dentistry. A huge pressure on the ferry system which is failing at present and not ready for an influx of workers taking those essential journeys from those living on the island.

With the highest standing charges and electricity costs, across the United Kingdom. If this does go ahead then at least energy should be provided at a reduced cost to the islanders.

Member of Public 260

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 is submitted under the relevant 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. Concerns arise regarding the scale, proximity, and design of the proposal, which fundamentally question its compatibility with statutory requirements, national policy, and sustainable development principles.

A critical review of the Environmental Impact Assessment Report and supporting documentation reveals significant deficiencies. The application lacks an adequate evidential basis for a lawful determination, with essential environmental data absent, baseline information limited and inconsistent, and key aspects of the proposal left undefined. The reliance on a flexible design framework hinders a clear understanding of likely significant effects, and without specified mitigation measures, their effectiveness remains unassessed. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, with assertions of negligible or non-significant effects lacking robust evidential support.

Furthermore, the proposal exhibits clear and substantive policy conflicts. It appears inconsistent with 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. The application does not demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. Such conflicts are directly relevant to the statutory tests needed for consent and compromise the competent authority's ability to deem the development acceptable in policy terms.

The unprecedented scale of the proposal raises serious concerns, particularly with large turbines positioned in close proximity to the shoreline, leading to significant implications for landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, undefined mitigation measures, evidential weaknesses, and clear policy non-compliance illustrates that the application is incomplete and unable to support a lawful determination. In light of these factors, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is significantly lacking and fails to deliver a complete, transparent, or trustworthy account of the probable environmental effects of the proposal. The introduction of a flexible Project Design Envelope, without clear commitments to specific turbine dimensions, layouts, or configurations, leads to considerable uncertainty. This uncertainty obstructs a consistent application of a worst-case scenario, undermining the integrity of the assessment. Consequently, the impacts presented may not accurately reflect the development that will ultimately be constructed, which inhibits both the public and the competent authority from fully grasping the true extent of environmental effects.

Moreover, the application places substantial reliance on mitigation measures, monitoring strategies, and management plans that have yet to be defined. Seeking consent on the premise that environmental harm will be addressed at a later stage hampers any meaningful evaluation of effectiveness or assessment of residual impacts. This postponement of critical information to post-consent stages is procedurally unacceptable and contradicts the purpose of the Environmental Impact Assessment regime, which necessitates that significant effects and mitigation measures are clearly established before determination.

In addition, significant evidential deficiencies are present, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This results in uncertainty regarding the scale and significance of impacts, particularly where conclusions of 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, introducing a level of scientific uncertainty that cannot be reconciled with statutory requirements.

As a result, the application does not meet the evidential threshold required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate compliance with National Planning Framework 4, including aspects related to biodiversity protection and environmental integrity, as it cannot be shown that impacts have been thoroughly assessed or that appropriate safeguards exist.

When considered collectively, the dependence on 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 hinder a lawful and rigorous assessment of environmental effects and mean that the competent authority cannot make a determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application fails to provide a structured and evidence-based assessment of alternatives, which is a critical requirement of the Environmental Impact Assessment regime. Instead of offering a reasoned comparison of feasible alternatives based on their environmental effects, it presents a narrative of project evolution that does not adequately demonstrate that less harmful options have been identified, evaluated, and chosen over more damaging solutions.

There is a clear absence of transparent comparison regarding alternative offshore sites, development scales, and design configurations. The application notably does not show that the developer has seriously considered placing turbines further offshore, where potential visual, ecological, and coastal impacts would likely diminish. The West Lewis coastline's sensitivity and the importance of proximity to shore in assessing impact render this lack of analysis particularly concerning, as it prevents any conclusions that the proposed siting is the least damaging option available.

Moreover, the deficiencies extend to the assessment of cable routing and landfall, where the evidence provided is insufficient to suggest that alternative routes have been adequately explored to avoid or reduce impacts on sensitive receptors. This includes significant cultural and spiritual sites like Barvas Cemetery. The absence of a clear strategy for avoidance and the lack of comparative analysis highlight that mitigation by design has not been considered, leading to a reliance on post-design mitigation measures instead.

Consequently, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This represents a significant failure to adhere to the established mitigation hierarchy, obstructing the competent authority's ability to ascertain whether more suitable and less harmful alternatives exist. Without a comprehensive assessment of alternatives, it cannot be determined that the proposal is sustainable or compliant with relevant policies.

From a policy standpoint, this deficiency raises serious concerns regarding adherence to National Planning Framework 4, especially in terms of protecting natural environments, cultural heritage, and community wellbeing. The absence of a systematic and comparative assessment constitutes a material omission that reinforces the conclusion that the application has not undergone adequate evaluation and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species is significantly flawed. It does not deliver a complete understanding of the ecological receptors in the West Lewis coastal area. This marine environment is sensitive and biologically vibrant, yet the baseline data used is lacking. The methodologies employed do not effectively capture the presence, behaviour, and habitat usage of various species. Consequently, the assessment fails to provide a reliable basis for understanding potential impacts.

A significant oversight is found in the treatment of otters, which are a European Protected Species. The application does not adequately recognise or assess their active use of coastal zones for foraging and movement. The failure to consider their core foraging range and behavioural patterns means that the possible effects of disturbances from construction, noise, and increased activity have not been thoroughly evaluated. This lack of attention to otters undermines any claims about the absence of significant impacts on this species.

The assessment of basking sharks also shows notable deficiencies. The reliance on aerial surveys creates considerable detection bias, particularly in Atlantic conditions. Such an approach is likely to underestimate the presence of these sharks, especially when compared with established land-based observations that indicate frequent usage of these waters. Neglecting to incorporate or adequately assess this data leads to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings result in conclusions about negligible or non-significant effects being based more on assumptions than on sound evidence. The insufficient baseline data also obstructs a meaningful examination of cumulative and indirect effects, including variations by season and interactions within the broader ecosystem. This results in uncertainty regarding the true extent of 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 it fails to identify or assess protected species properly. The uncertainty introduced by these deficiencies prevents the reasonable exclusion of adverse effects, thus necessitating the application of the precautionary principle. Under these conditions, granting consent would not be lawful.

In summary, the combination of incomplete baseline data, inadequate methodologies, and unfounded conclusions leads to an unreliable assessment. These issues hinder a thorough evaluation of the impacts on marine ecology and protected species and result in the overall determination that the application does not have a solid evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents significant methodological weaknesses and internal inconsistencies that undermine its conclusions regarding the ornithological assessment. It fails to demonstrate, to the necessary evidential standard, that internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already in decline, will remain unaffected. This development is situated within crucial foraging areas and migratory pathways; however, the assessment inadequately evaluates the potential implications of displacement, collision risk, and habitat loss.

There exists a fundamental contradiction within the application, as it asserts that there will be no significant adverse effects while simultaneously proposing a Habitats Regulations derogation case, which is only warranted when significant harm is anticipated. This inconsistency raises serious concerns about the reliability of the assessment and casts doubt on the validity of the conclusions drawn from the available evidence.

Furthermore, the assessment does not sufficiently account for the seabird species associated with protected sites such as the Lewis Peatlands and St Kilda. The critical nature of these feeding grounds is not fully recognised, and the dependence on modelling approaches introduces uncertainty, particularly concerning species facing severe decline, including Kittiwakes and Fulmars. Methodologies employed are likely to underestimate potential mortality, particularly in light of incomplete baseline data and inadequate understanding of species' behavioural responses.

The placement of turbines within a recognised migratory corridor presents an additional significant risk, effectively obstructing 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 sustained mortality within this corridor or its potential impact on species with relatively small global populations.

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, alongside data deficiencies and modelling constraints, indicates that the standard of beyond reasonable scientific doubt has not been satisfied. This situation engages the precautionary principle, precluding a lawful conclusion in support of consent.

Moreover, the identified deficiencies signify non-compliance with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets.

The failure to demonstrate that internationally significant seabird populations will not be adversely impacted directly conflicts with national policy.

Collectively, the assessment lacks reliability due to its internal contradictions, methodological flaws, and inadequate evidence. These deficiencies obstruct a thorough evaluation of impacts and substantiate the overall conclusion that the application does not meet the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the West Lewis coastline's cultural heritage and community identity is severely lacking, failing to recognise the area as a living cultural landscape where environment, language, tradition, and community are deeply intertwined. Instead of acknowledging the ongoing social, cultural, and spiritual significance of heritage, the application adopts a narrow perspective, treating it as a collection of isolated, static assets.

There is a notable deficiency in how culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are approached. These locations serve as active places of burial and spiritual practice; however, they are inaccurately categorised as mere static features. This oversight neglects their continued usage and the implications that development may have on their surroundings, leading to an incomplete understanding of cultural effects and disregarding their integral role in community life.

Moreover, the assessment overlooks intangible cultural heritage, including the Gaelic language, local traditions, and the enduring relationship between the community and its coastal environment. These vital components are essential to the identity of the area and are inexplicably absent from the evaluation, representing a significant gap. The lack of consideration for these aspects hinders a proper understanding of the cultural impact of the proposed development.

Concerns regarding community rights and engagement are also prevalent. The Gaelic-speaking population embodies a distinct cultural identity akin to an Indigenous People, yet no process of Free, Prior and Informed Consent has been observed. This lack of meaningful engagement severely undermines the validity of the assessment and fails to adhere to established principles of participation in decisions that affect cultural and environmental interests.

A crucial procedural flaw is the absence of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. The lack of this assessment prevents the competent authority from fulfilling 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 perspective, these significant deficiencies place the proposal at odds with the National Planning Framework 4, particularly regarding the protection of historic assets and places. The disregard for both tangible and intangible heritage, along with the failure to recognise living cultural practices, marks a clear deviation from policy requirements.

Ultimately, the collective failure to assess living heritage, intangible cultural value, community rights, and statutory obligations has created a substantial evidential gap. The cultural impacts of the proposed development have not been properly evaluated, and the application fails to provide an adequate basis for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The current evaluation of social impacts, health, and wellbeing is lacking in transparency and is materially deficient. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents, but the full report has not been published. This omission creates a significant evidential gap, making it difficult for both the public and the competent authority to grasp the full range of social risks identified by the developer's research.

Available summaries suggest that residents are facing measurable levels of stress, anxiety, and concern related to the scale and proximity of the proposed development. These impacts arise from direct engagement with the community and are not speculative in nature. Nonetheless, the failure to release the complete assessment inhibits thorough scrutiny of the findings and restricts the ability to evaluate their significance in the decision-making process.

Moreover, the proposal is seen as a threat to community identity and cohesion, with concerns about "cultural loss" highlighted in the developer's findings. Despite this, these social impacts have not been adequately integrated into the application or afforded the necessary weight. The absence of the full Social Impact Assessment clouds the understanding of the genuine human and social costs associated with the development.

This lack of transparency adversely affects the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health implications is critical for developments of this magnitude, especially when community character and functionality are at stake. The failure to provide complete data means that the application does not offer a thorough evidential basis to assess the balance of

benefits and harm.

From a policy viewpoint, the application does not show adherence to National Planning Framework 4 regarding health and wellbeing. It is essential for developments to support positive health outcomes and mitigate harm; however, the evidence available indicates that adverse effects already exist and have not been fully revealed. Without the complete assessment, demonstrating compliance with this policy is not achievable.

The procedural consequences are notable. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This lack of information constitutes a material omission within the application and fails to meet the evidential standards required by the Environmental Impact Assessment framework.

In conclusion, the failure to disclose the complete Social Impact Assessment, along with evidence of existing adverse effects, results in an incomplete and unreliable assessment. This undermines the ability to make a lawful determination and strengthens the argument that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the proposed development lacks sufficient detail regarding the impacts on seascape, landscape, and visual elements, failing to appropriately address the extent of change and the sensitivity of the local environment. The West Lewis coastline is characterised by its expansive Atlantic horizon, its undeveloped nature, and a strong sense of remoteness. The planned introduction of large-scale turbines near the shoreline would result in a continuous industrial presence that fundamentally alters this character and leads to a permanent transformation of the landscape.

The application inadequately conveys the scale of the visual change that would occur. Due to the size and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations. This would directly undermine visual amenity and diminish the naturalness and remoteness that define the area. The assessment does not effectively communicate the significance of this impact within the context of such a sensitive landscape.

There are notable methodological flaws concerning how visual viewpoints are selected and presented. Evidence indicates that these viewpoints may not fully account for the most sensitive receptors or the worst-case scenarios, especially concerning important cultural heritage sites and valued landscapes. This raises the risk that the assessment has understated the magnitude of visual impacts, thus compromising its reliability.

Another significant shortcoming is the failure to consider the interconnected nature of landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are linked to the broader landscape through visual and spatial relationships with the Atlantic horizon. The assessment treats these heritage assets as isolated rather than recognising their interdependence, which leads to an incomplete evaluation of the impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would disrupt these relationships, changing the context in which heritage assets are experienced and their connection to the natural horizon. This represents not merely a visual impact but also a wider cultural and spatial harm that has not been properly assessed in the application.

From a policy standpoint, the proposal directly contravenes the principles outlined in National Planning Framework 4 regarding the safeguarding of natural environments and historic assets. The anticipated changes are inconsistent with the obligation to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case scenario assessment further calls into question any claims of adherence to policy requirements.

It is evident that the identified impacts cannot be effectively mitigated. Given the size, height, and proximity of the turbines, their presence would be overwhelming and unavoidable. Therefore, the resulting changes are fundamental and permanent, not amenable to reduction through mitigation efforts.

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 deficiencies hinder a reliable evaluation and strongly suggest that the proposal is incompatible with the necessary protections for this landscape.

CONSTRUCTION AND POLLUTION RISKS

The absence of detailed management plans and defined mitigation measures leads to a materially deficient assessment of construction and pollution risks. The proposal, which entails substantial seabed preparation and installation works within a high-energy Atlantic environment, does not present fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are set to be prepared after consent, thereby hindering a meaningful evaluation of their adequacy or effectiveness.

There is significant uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and

clearly defined management strategies in place, 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, which have already been identified as sensitive in the wider assessment.

The proposal also acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, yet it fails to provide sufficient details on how these risks will be prevented, controlled, or monitored. The sensitivity of the receiving environment, including the West Lewis coastline that supports clean coastal waters and important habitats vulnerable to sediment disturbance and contamination, further heightens these concerns.

Furthermore, the absence of detailed emergency response procedures compounds the issues raised. By deferring contingency planning to a post-consent stage, the application obstructs the evaluation of whether appropriate safeguards are in place to address pollution events. This introduces procedural risk and undermines the competent authority's ability to assess environmental protection measures at the point of determination.

From a regulatory perspective, this deferral of critical environmental safeguards is inconsistent with the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation measures must be assessed prior to consent; if such information is lacking, a lawful determination cannot be made. Additionally, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

In summary, the deficiencies identified within the assessment, including the lack of detailed management plans, uncertainty regarding potential impacts, and absence of defined mitigation measures, collectively illustrate that the evaluation of construction and pollution risks is inadequate and further support the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application lacks a robust evaluation of the ecological and socio-economic impacts on fisheries and marine life. The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the proposal fails to adequately demonstrate how these habitats and activities can be protected or maintained without significant disruption.

One major concern is the assumption that fishing activities can be displaced without negative consequences. The application does not provide evidence that alternative

fishing grounds are available, accessible, or capable of supporting any additional pressure. This is a critical omission, as such displacement poses a risk of overfishing in other areas and could have broader economic repercussions for the local fishing fleet. Without a clear, evidence-based assessment, the potential impacts on fisheries and the livelihoods dependent on them remain unclear.

The proposal also poses considerable risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over an extended period is likely to cause significant disturbance over large distances, affecting species such as dolphins. The anticipated disturbance to a considerable portion of the local bottlenose dolphin population is particularly concerning, yet the application appears to downplay the significance of these effects without adequate supporting evidence.

There is a notable inconsistency in the application regarding the need for licences to permit harm to European Protected Species, acknowledged while simultaneously claiming the impacts are negligible. This contradiction raises doubts about the credibility of the assessment and raises issues of compliance with the Habitats Regulations, especially where harm is anticipated to the extent that legal authorisation would be necessary.

Moreover, the assessment does not consider cumulative impacts resulting from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, it is impossible to determine 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 establish that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thereby preventing any conclusion that the proposal represents sustainable development.

In summary, the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the application all contribute to an assessment that is incomplete and unreliable. These shortcomings hinder a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the proposed onshore infrastructure is inadequate and does not fully address the impacts of what constitutes a singular integrated project. The offshore turbines and onshore activities are interconnected, yet they are evaluated

independently, leading to a disjointed assessment that fails to reveal the comprehensive scale of environmental and socio-economic consequences.

Significant elements of the onshore works comprise cabling across protected moorland, the construction of a substation in proximity to Stornoway, and the necessary access routes through fragile landscapes. These construction activities involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as an important carbon store and is an ecologically sensitive habitat. The application lacks a thorough examination of these impacts, obstructing a complete understanding of the project's overall environmental footprint.

By omitting or delaying the assessment of onshore impacts, the application hinders the accurate evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all project components be evaluated collectively. However, the division of offshore and onshore elements prevents a full comprehension of the combined impacts on peatlands, habitats, and local communities.

Additionally, there are significant risks posed to sensitive habitats, including machair systems and peatland environments that are protected by policy measures. The application fails to show that the impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, leading to a clear evidential gap in the context of biodiversity protection.

Concerns also arise regarding the carbon balance implications of the proposal. Disturbance of peatland may release stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy initiatives. The application does not sufficiently tackle this concern or prove that the overall carbon balance remains advantageous.

Furthermore, the routing of infrastructure through active croft land could lead to conflicts with established land use and legal rights. There is a lack of evidence that the essential consents or processes have been initiated, raising doubts about the project's feasibility and lawful execution.

From a policy standpoint, the failure to evaluate the project in its 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 prove that impacts can be avoided or mitigated further compromises the integrity of the application.

Collectively, the disjunction of project components, the absence of comprehensive

assessments, and the lack of substantiation regarding environmental and land use impacts render this section of the application incomplete and untrustworthy, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal 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 along the West Lewis coastline, which is known for its exceptionally dark skies. These dark skies are vital to the area’s environmental quality, cultural identity, and tourism value.

The Environmental Impact Assessment notably lacks an evaluation of how this lighting will impact visual amenity, landscape character, and the experience of residents and visitors. Given the significance of dark skies to the local identity and the emerging sector of astro-tourism, this omission represents a substantial gap in the overall landscape and environmental assessment.

Furthermore, there is no analysis of the impacts on nocturnal wildlife, including species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel, which are highly sensitive to artificial lighting. The absence of any lighting impact assessment or phototaxis study means that the potential effects of aviation lighting on these species, including disorientation and increased collision risk, have not been addressed.

The ornithological assessment relies solely on daytime survey data, which fails to capture nocturnal activity and associated risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been assessed. The lack of site-specific night-time data creates a critical gap in understanding the ecological impacts of the proposal.

Without an assessment of these nocturnal impacts, it is impossible to ascertain whether protected species or designated sites could be adversely affected. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt cannot be met, invoking the precautionary principle and obstructing a lawful determination.

From a policy standpoint, the absence of these assessments conflicts with the National Planning Framework 4 regarding the protection of natural places and environmental quality. Additionally, it undermines the overall assessment of landscape and seascape impacts, as the night-time character is an integral aspect of the environment.

In summary, the complete lack of assessment concerning dark skies and nocturnal

wildlife creates a significant evidential gap. The deficiencies in baseline data, impact modelling, and species-specific analysis render the application incomplete and unsuitable for a lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development as outlined in statutory duties, national policy, and evidential standards. It mirrors the central issues that led to the 2008 rejection of the Lewis Wind Power proposal, which found the level of industrialisation unacceptable. This new application is presented within a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and the wellbeing of communities.

There are significant gaps in the evidential basis necessary for proper determination of the application. The use of an undefined design envelope, reliance on unspecified mitigation measures, and the absence of crucial impact pathways, including those related to nocturnal wildlife, full onshore infrastructure, and tourism, have resulted in an incomplete Environmental Impact Assessment. This inadequacy hinders a comprehensive understanding of the likely significant effects or residual impacts.

Procedural shortcomings are also evident, notably the lack of a compliant Island Communities Impact Assessment, which breaches statutory obligations under the Islands (Scotland) Act 2018. The failure to provide a complete Social Impact Assessment represents a serious omission that prevents the competent authority from evaluating the effects on community wellbeing, cultural identity, and economic resilience. These deficiencies render the application unfit for determination.

The proposal is at odds with the National Planning Framework 4, failing to prove the protection of biodiversity, natural spaces, and cultural heritage. It does not demonstrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to missing tourism impact modelling. The cumulative effects of offshore and onshore components have not been adequately assessed, obscuring their implications for peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal are uncertain and potentially significant. Evaluations of marine ecology, seabirds, protected species, and marine mammals remain incomplete and inconsistent in places. The evidence presented does not meet the threshold required to eliminate adverse effects beyond reasonable scientific doubt, thus engaging the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

Moreover, the proposal would lead to substantial and irreversible changes in a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, loss of dark skies, disruption of cultural and visual relationships, and adverse impacts on tourism are permanent effects 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 obstructs a lawful and evidence-based decision. It is imperative that the competent authority either refuse consent on these grounds or invoke the appropriate regulatory measures to request the submission of the missing information.

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

Additional Comments

No matter which direction i will look in I will see them.

There will be noise, there will be lights all having an impact on health.

The environmental impact on land and sea will be catastrophic with no going back. The damage will be untold.

Stornoway will be made into Industrial town.