

Member of Public 261

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 pertinent marine licensing and Environmental Impact Assessment frameworks. The objection arises from a thorough examination of the Environmental Impact Assessment Report alongside supplementary documents, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. Situated off the west coast of the Isle of Lewis, the area is characterised by its Atlantic-facing coastline, a largely untouched environment, and a strong cultural presence. The proposal's scale, its proximity to the shore, and its design evoke serious concerns regarding adherence to statutory obligations, national policy, and sustainable development principles.

There is a lack of adequate evidence provided for a lawful decision. Important environmental data is absent, baseline information is both limited and inconsistent, and essential components of the proposal remain unspecified. The adoption of a flexible design framework hinders a precise understanding of potential significant effects, while the dependence on unspecified mitigation strategies renders their efficacy unassessable. Consequently, the provided documentation fails to offer a comprehensive understanding of the environmental, cultural, and community impacts involved, and claims suggesting negligible or non-significant effects lack solid supporting evidence.

Substantial conflicts with policy are evident. The proposal appears to diverge from the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural areas, cultural heritage, and public health and wellbeing. It does not sufficiently demonstrate compliance with national obligations to safeguard biodiversity, climate considerations, and environmental integrity. These discrepancies are critical as they directly relate to the statutory tests necessary for consent and compromise the capability of the competent authority to affirm that the development aligns with policy standards.

The unprecedented scale of this proposal poses additional challenges, with large turbines situated in close proximity to the coastline, raising significant issues regarding landscape capacity, visual dominance, and environmental repercussions. Collectively, the lack of adequate information, reliance on undefined mitigation measures, evidential

shortcomings, and clear non-compliance with policies illustrate that the application is incomplete and cannot facilitate a lawful decision. In light of these factors, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary transparency and reliability, failing to fully account for the potential environmental effects of the proposal. The flexible Project Design Envelope approach, which does not commit to specific turbine dimensions, layouts, or configurations, introduces a substantial level of uncertainty. This uncertainty hampers the ability to apply a worst-case scenario consistently, ultimately undermining the integrity of the assessment. Consequently, the information provided may not accurately represent the impacts of the eventual construction, leaving both the public and competent authority without a clear understanding of the actual environmental consequences.

Moreover, the application is overly reliant on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent under these conditions means that environmental harm is expected to be addressed later, making it impossible to meaningfully evaluate the effectiveness of these measures or to assess residual impacts. This postponement of crucial information to post-consent phases is procedurally unacceptable and runs counter to the objectives of the Environmental Impact Assessment process, which necessitates that significant effects and mitigation strategies are clearly defined before any determination can occur.

There are also considerable evidential shortcomings, characterised by gaps in baseline data, methodological limitations, and an over-reliance on assumptions instead of site-specific evidence. Such deficiencies create uncertainty regarding the magnitude and significance of impacts, especially in cases where claims of negligible or non-significant effects are made without adequate supporting data. The lack of comprehensive information obstructs a clear understanding of cumulative and worst-case impacts, leading to scientific uncertainties that are incompatible with statutory obligations.

Ultimately, the application does not satisfy the evidential standards set forth by the Habitats Regulations, which require the exclusion of adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate alignment with the National Planning Framework 4, particularly in relation to the protection of biodiversity and environmental integrity, as it has not been shown that impacts have been fully assessed or that adequate safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specified mitigation measures, and significant gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings hinder a lawful and thorough assessment of environmental effects, leaving the competent authority without the necessary information to make an informed decision regarding the application.

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.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment is fundamentally flawed, characterised by significant evidence gaps and internal inconsistencies that jeopardise its conclusions. The development site lies within key foraging areas and migratory pathways for seabirds, particularly along the west coast of the Isle of Lewis, which supports internationally important seabird populations that are already in decline. Yet, the application fails to provide the evidential standard required to demonstrate that these species will not be adversely affected.

A crucial contradiction arises in the application, where the developer claims no significant adverse effects while also pursuing a Habitats Regulations derogation case, which is only necessary in instances where significant harm is anticipated. This inconsistency undermines the credibility of the assessment, indicating that the conclusions drawn lack support from the underlying evidence. Furthermore, the assessment does not adequately demonstrate that seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not thoroughly addressed, and the reliance on modelling methodologies introduces uncertainty, especially concerning species facing severe declines like Kittiwakes and Fulmars.

The siting of turbines within a recognised migratory corridor poses an additional significant risk, as it effectively creates a barrier in a primary flight path used by birds migrating between the United Kingdom and Iceland. There is an insufficient evaluation of 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 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 conflicting conclusions, alongside data deficiencies and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This engages the precautionary principle, thwarting a lawful conclusion in favour of consent.

Moreover, the identified deficiencies indicate a failure to comply 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 adversely affected places the proposal in direct contradiction to national policy. Collectively, these weaknesses render the assessment unreliable due to its internal inconsistencies, methodological flaws, and insufficient evidence. These issues obstruct a thorough evaluation of impacts and contribute to the overarching conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is fundamentally inadequate, failing to recognise the West Lewis coastline as a living cultural landscape where environment, language, tradition, and community are intrinsically connected. The application adopts a reductive approach, treating heritage as isolated, static assets rather than acknowledging their ongoing social, cultural, and spiritual function within the community.

A significant deficiency arises from the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet the assessment categorises them merely as static features, neglecting their continued use and the impact of development on their setting. This mischaracterisation leads to an incomplete evaluation of cultural effects and disregards their integral role within community life.

Moreover, the application fails to consider intangible cultural heritage, which includes the Gaelic language, traditions, and the long-standing relationship between the community and the coastal environment. These elements are central to the identity of the area but are entirely absent from the assessment, representing a significant omission. Without addressing these factors, the cultural impact of the development cannot be fully understood.

Concerns about community rights and engagement further exacerbate the situation. The Gaelic-speaking population has a distinct cultural identity recognised as characteristic of Indigenous Peoples; however, no process of Free, Prior and Informed Consent has been undertaken. This lack of meaningful engagement undermines the legitimacy of the assessment and fails to reflect established principles of participation in decisions affecting cultural and environmental interests.

A critical procedural failure is the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone

prevents a lawful determination.

From a policy standpoint, these deficiencies place the proposal in direct conflict with National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to consider both tangible and intangible heritage, alongside the neglect of living cultural practices, signifies a clear departure from policy requirements.

In summary, the lack of assessment regarding living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential gap. The cultural impacts of the development have not been properly assessed, leading to an application that does not provide a sufficient basis for evaluating the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The evaluation of social impacts, health, and wellbeing associated with the proposed development is fundamentally inadequate and lacks the necessary transparency for a lawful review. Although the developer has commissioned a Social Impact Assessment, including focus group discussions with local residents, the full report remains unpublished. This creates a critical evidential gap, hindering both public understanding and the competent authority's ability to assess the social risks identified by the developer's own investigation.

Residents are already reporting measurable levels of stress, anxiety, and concern linked to the scale and proximity of the proposal, as derived from direct engagement and therefore not speculative in nature. However, the absence of the complete assessment limits proper scrutiny of these findings and curtails the capacity to assess their implications during the decision-making process.

Moreover, there is evidence indicating that the proposal is viewed as a threat to community identity and cohesion, with the developer acknowledging the potential for "cultural loss" in its findings. Despite this recognition, the impacts have not been sufficiently incorporated into the main application or afforded the appropriate weight in consideration. The failure to release the full Social Impact Assessment obscures the real human and social costs tied to the development.

This lack of transparency undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health consequences is critical for developments of this magnitude, especially when community character and functionality may be at risk. The omission of the full dataset prevents the application from presenting a robust evidential foundation for weighing the benefits against the potential harms.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Developments are expected to promote positive health outcomes and mitigate harm; however, the available evidence reveals existing adverse effects that have not been adequately disclosed. Without access to the complete assessment, demonstrating compliance with this policy remains impossible.

The procedural ramifications are considerable. The competent authority is unable to carry out a thorough socio-economic and health evaluation in the absence of the full Social Impact Assessment. This represents a significant shortcoming within the application and fails to satisfy the evidential requirements stipulated by the Environmental Impact Assessment framework.

In summary, the non-disclosure of the complete Social Impact Assessment, alongside evidence of current adverse impacts, results in an incomplete and unreliable assessment. This ultimately obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development poses serious shortcomings in its evaluation of seascape, landscape, and visual impacts. It does not sufficiently capture the extent of change or the delicate nature of the surrounding environment. The character of the West Lewis coastline is marked by its expansive Atlantic horizon, its undeveloped landscape, and a profound sense of remoteness. The addition of large-scale turbines near the shoreline would create a continuous industrial presence that fundamentally alters this character and results in a permanent transformation of the landscape.

Moreover, the application fails to adequately reflect the magnitude of the visual changes that would occur. The size and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and diminishing the qualities that define naturalness and remoteness. The assessment lacks a proper depiction of this impact and its significance in light of the landscape's sensitivity.

There are significant methodological issues concerning the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not accurately represent the most sensitive receptors or the worst-case scenarios, especially regarding culturally important sites and high-value landscapes. This leads to the risk of underestimating the magnitude of visual impacts, which undermines the assessment's credibility.

Additionally, the assessment does not consider the interconnectedness of landscape, seascape, and cultural heritage. Key sites such as the Calanais Standing Stones and other Scheduled Monuments are intrinsically linked to their landscape setting, united by visual and spatial relationships with the Atlantic horizon. Treating these heritage assets in isolation overlooks their interdependence, leading to an incomplete evaluation of the impacts on their settings and cultural significance.

The industrialisation of the seascape would disrupt these connections, altering how heritage assets are perceived and their links to the natural horizon. This represents not merely a visual impact but a broader cultural and spatial detriment that has not been adequately addressed in the application.

From a policy standpoint, the proposal is at odds with the National Planning Framework 4, particularly concerning the safeguarding of natural areas and historic assets. The scale of the proposed changes is incompatible with the imperative to protect landscape character, visual amenity, and the integrity of culturally significant sites. The lack of a rigorous worst-case assessment further calls into question any assertions of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. Given the turbines' scale, height, and proximity, their presence would be unavoidable and dominant. The changes are therefore fundamental and permanent, rather than amenable to reduction through mitigation measures.

In summary, the assessment falls short in accurately portraying the scale 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 preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal raises significant concerns regarding the assessment of construction and pollution risks, which is both incomplete and lacking the necessary detail to properly evaluate likely environmental effects. There is a substantial undertaking involved in seabed preparation and installation works within the challenging high-energy Atlantic environment. However, the application fails to provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it leans on vague mitigation and contingency measures to be established after consent, which obstructs any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures is particularly alarming, especially in light of

the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and vital 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 offer sufficient information on how these issues will be prevented, controlled, or monitored.

Furthermore, there is uncertainty surrounding the scale and behaviour of sediment plumes generated from seabed disturbance and cable installation. Without robust modelling and well-defined management strategies, it remains impossible to ascertain the extent, duration, or ecological effects of such impacts. This uncertainty also extends to the potential effects on marine species and habitats already identified as sensitive in the broader assessment.

Compounding these concerns is the absence of detailed emergency response procedures. By deferring contingency planning until after consent has been granted, the application hampers the ability to evaluate whether adequate safeguards are in place to address pollution events. This introduces procedural risk and undermines the capacity of the competent authority to assess environmental protection measures prior to determination.

From a regulatory standpoint, deferring critical environmental safeguards stands in direct conflict with the requirements of the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation are assessed before consent is granted; without this information, a lawful determination cannot be made. The application also fails to demonstrate adherence to policy requirements concerning environmental protection and water quality.

In conclusion, the combination of undefined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts results in a materially deficient assessment. These deficiencies hinder a thorough evaluation of construction and pollution risks, further reinforcing the view that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal concerning the waters off the West Lewis coast is fundamentally flawed, as it neglects to provide a thorough assessment of fisheries and marine life. This area is home to a rich marine ecosystem and supports an active fishing industry, yet the application fails to show how these vital uses and habitats will be safeguarded from significant disruption.

A major concern lies in the unfounded assumption that fishing activities can simply be

displaced without adverse effects. There is no evidence presented that alternative fishing grounds are available, accessible, or able to accommodate increased pressure from displaced fishing efforts. This lack of information is critical, as such displacement could lead to overfishing in other areas and would have broader economic repercussions for the local fishing fleet. Without a clear, evidence-backed evaluation, the implications for fisheries and local livelihoods remain vague and concerning.

Moreover, the application raises significant risks to marine species, particularly due to the underwater noise generated during construction activities. The high-energy hammer piling anticipated over a prolonged period is likely to disturb marine life across large distances, notably impacting species such as dolphins. The projected disruption to a substantial portion of the local bottlenose dolphin population is alarming, yet the application minimizes the seriousness of these effects without adequate supporting evidence.

The document also exhibits glaring contradictions; it acknowledges the necessity for licenses to permit harm to European Protected Species while simultaneously stating that the anticipated impacts are negligible. This inconsistency severely undermines the assessment's credibility and raises questions about adherence to the Habitats Regulations, particularly when harm is expected to an extent that necessitates legal authorisation.

Furthermore, the assessment lacks consideration of cumulative impacts stemming from various pressures such as habitat disruption, noise pollution, and the displacement of fishing activities. Without an all-encompassing evaluation of these combined effects, it is impossible to accurately ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not convincingly demonstrate compliance with the National Planning Framework 4 or the National Marine Plan. It fails to prove that the development can coexist with current marine users or avoid unacceptable repercussions on marine biodiversity, which hinders any determination that the proposal aligns with sustainable development principles.

In summary, the absence of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions throughout the application culminate in an incomplete and unreliable assessment. These shortcomings impede 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 is a significant oversight within the Environmental Impact Assessment. The West Lewis coastline is renowned for its exceptionally dark skies, which are vital for the area's environmental quality, cultural identity, and tourism value. The introduction of permanent red aviation lighting, visible over considerable distances, would create a persistent and disruptive "wall of light" effect across the western horizon, drastically 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 consideration is especially troubling given the significance of dark skies to the area's identity and the emerging sectors of tourism, such as astro-tourism. The omission represents a clear gap in the overall assessment of landscape and environmental impacts.

Furthermore, there is no examination of the effects on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can result in disorientation and a heightened risk of collision. The application lacks any lighting impact assessment or phototaxis study, failing to address how aviation lighting might affect these species or contribute to increased mortality rates.

The reliance on daytime survey data for the ornithological assessment exacerbates this issue, as it does not capture nocturnal activities or the associated risks. Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this potential hazard remains unassessed. The lack of site-specific night-time data creates a critical deficiency in understanding ecological impacts.

Without an evaluation of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites may be adversely affected. The required evidential standard to exclude any adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and preventing a lawful determination.

From a policy standpoint, the omission contradicts the National Planning Framework 4 concerning the protection of natural environments and overall environmental quality. It also compromises the broader assessment of landscape and seascape impacts, as the character of night-time is a fundamental aspect of the environment.

In summary, the failure to assess dark skies and nocturnal wildlife represents a considerable 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 proposal for the Spiorad na Mara Offshore Wind Farm exemplifies a significant failure to meet the principles of sustainable development, as it fails to align with statutory duties, national policy, and evidential standards. This application revisits the core concerns that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was highlighted. The current proposal is put forward within a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

The application lacks a complete and reliable evidential basis for assessment, with significant gaps in baseline data. It employs an undefined design envelope and depends on unspecified mitigation measures while failing to address critical impact pathways, including nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is inadequate, hindering a full understanding of the likely significant effects and residual impacts.

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

The proposal contradicts the National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural environments, and cultural heritage, fails to show that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit owing to the absence of tourism impact modelling. Moreover, the cumulative effects of both offshore and onshore components have not been adequately assessed, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

The 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 sometimes contradictory. The evidential standard required to rule out adverse effects beyond reasonable scientific doubt has not been fulfilled, invoking the precautionary principle and precluding a lawful determination that impacts are acceptable.

Furthermore, the proposal would cause substantial and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the

loss of dark skies, disruption of cultural and visual relationships, and negative effects on tourism represent permanent changes that cannot be adequately mitigated.

In summary, the application is procedurally and substantively unfit for determination. The extent of information deficiencies, combined with policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority must either refuse consent on these grounds or invoke the necessary 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

Places globally are shrinking in terms of cultural and biodiversity. It is important that we protect the existing parts of the world that offer cultural consistency in terms of Gaelic language and lifeways. Once the places that honour these endangered languages are altered beyond repair, the language also shifts and becomes obsolescent. Furthermore, this area of the world has some of the most biodiversity anywhere, especially in terms of mammals and sea life in the depths of the Atlantic and the Minch. Tampering with this ecosystem could have disastrous impacts for hundreds of years. If we only think about the contemporary impact, we lose the chance to plan for a 250-300 year plan where we consider the impacts these choices will have on our children, their children, and their children's children. This is true for human and non human species. It is imperative that we slow down and think holistically about these types of choices which cannot be undone once they are built. The future counts on us taking the proper time, consultation, and culturally and biodiversity into account. Money will not feed and sustain our lifeways and waterways.

Member of Public 262

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. A comprehensive review of the Environmental Impact Assessment Report and associated documentation reveals significant deficiencies in planning, environmental considerations, cultural impacts,

and procedural compliance. 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.

Concerns arise primarily due to the unprecedented scale and design of the proposal, which raises questions about its compatibility with statutory requirements, national policy, and sustainable development principles. The application does not establish a sufficient evidential basis for a lawful determination. Critical environmental data is lacking, baseline information is inconsistent and limited, and several key aspects of the proposal remain undefined. The flexible design framework employed does not facilitate a clear assessment of likely significant effects, and the reliance on unspecified mitigation measures renders the evaluation of their effectiveness impossible. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, undermining claims of negligible or non-significant effects due to the absence of robust supporting evidence.

Moreover, there are evident and substantive conflicts with established policies. The proposal seems to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural landscapes, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements for the protection of biodiversity, climate interests, and environmental integrity. Such conflicts directly affect the statutory tests necessary for consent and impair the competent authority's ability to determine the proposal's acceptability in policy terms.

The proximity of large turbines to the shoreline introduces significant concerns regarding landscape capacity, visual dominance, and environmental impact. In light of the absence of adequate information, dependence on undefined mitigation strategies, evidential inadequacies, and clear policy non-compliance, it is evident that the application is incomplete and cannot support a lawful determination. Thus, the application must invoke the precautionary principle.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application is fundamentally flawed due to its reliance on an undefined Project Design Envelope, which lacks specific commitments regarding turbine dimensions, layouts, or configurations. This introduces substantial uncertainty that hinders the application of a worst-case scenario analysis. Consequently, the integrity of the Environmental Impact Assessment Report is compromised, failing to accurately reflect the potential environmental impacts of the proposed development. As a result, both the public and the competent authority are left without a clear understanding of the actual extent of these impacts.

Furthermore, the application depends heavily on unestablished mitigation measures, monitoring strategies, and management plans. This approach seeks consent under the premise that any environmental harm will be addressed at a later date, thereby obstructing a thorough evaluation of the effectiveness of such measures and the assessment of any residual impacts. The deferral of critical information to post-consent stages is procedurally unacceptable, contradicting the fundamental aims of the Environmental Impact Assessment framework, which mandates that significant effects and corresponding mitigation strategies be clearly delineated prior to the determination of applications.

Significant evidential deficiencies are evident, including gaps in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. This situation gives rise to uncertainty regarding both the scale and significance of the impacts, particularly in cases where conclusions of negligible or non-significant effects are asserted without adequate supporting data. Such a lack of sufficient information obstructs a clear comprehension of cumulative and worst-case impacts, thereby introducing a degree of scientific uncertainty that cannot be aligned with statutory requirements.

As a result, the application fails to satisfy the evidential standards necessitated by the Habitats Regulations, particularly regarding the exclusion of adverse effects beyond reasonable scientific doubt. This situation necessitates the invocation of the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, especially regarding biodiversity protection and environmental integrity, as it cannot substantiate that impacts have been fully assessed or that adequate safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specified mitigation measures, and the significant gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These serious deficiencies impede a lawful and rigorous assessment of environmental effects, leaving the competent authority unable to make an informed decision based on the information submitted.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species lacks completeness and reliability, failing to provide a full understanding of the ecological receptors in the West Lewis coastal environment. This area is sensitive and biologically active, yet the baseline data remains inadequate. The methodologies used do not effectively capture

the presence, behaviour, and habitat use of species in this marine system. Consequently, the assessment does not establish a solid evidential basis for impact evaluation.

A significant shortcoming is the omission of otters, which are a European Protected Species. The application does not adequately recognise their active foraging and movement within coastal areas. By neglecting their core foraging range and behavioural patterns, the potential impacts of construction disturbance, noise, and increased activity have not been properly assessed. This lack of assessment undermines conclusions regarding the absence of significant effects on otters.

The assessment of basking sharks also exhibits deficiencies, particularly due to reliance on aerial surveys that introduce considerable detection bias, especially under Atlantic conditions. This approach likely leads to an underestimation of their presence, especially when compared to established land-based observations indicating frequent use of these waters. The failure to include or appropriately consider such data results in an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological flaws mean that the conclusions of negligible or non-significant effects are based on assumptions rather than solid evidence. The insufficient baseline data limits the ability to meaningfully assess cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty regarding the actual level of risk to marine species and habitats.

From a regulatory standpoint, the application does not comply with the Environmental Impact Assessment requirements and National Planning Framework 4, as it has not properly identified or assessed protected species. The uncertainty introduced means that adverse effects cannot be excluded beyond reasonable scientific doubt, engaging the precautionary principle. Therefore, consent cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These issues hinder a robust evaluation of the impacts on marine ecology and protected species and highlight that the application does not have a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment conducted lacks reliability due to significant internal inconsistencies and methodological weaknesses, which result in a failure to provide adequate evidence. The application does not meet the evidential threshold required to demonstrate that the integrity of protected sites will remain unaffected. Notably, the assessment fails to robustly evaluate the implications of displacement, collision risk, or

habitat loss within key foraging areas and migratory pathways located on the west coast of the Isle of Lewis, which supports internationally important seabird populations that are already in decline.

There exists a fundamental contradiction in the application. The developer asserts that no significant adverse effects will occur while simultaneously proposing a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This inconsistency raises questions about the reliability of the assessment and the validity of its conclusions, which are not substantiated by the evidence presented.

Furthermore, the assessment does not sufficiently account for the importance of feeding grounds associated with protected sites, such as the Lewis Peatlands and St Kilda. The reliance on modelling approaches creates uncertainty, particularly for species experiencing severe decline, including Kittiwakes and Fulmars. The methodologies employed may underestimate mortality rates, especially where baseline data is lacking and behavioural responses remain inadequately understood.

The placement of turbines within a recognised migratory corridor introduces a notable risk, as it effectively creates a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor are not adequately addressed in the application, nor are the potential effects on species with relatively small global populations considered.

In light of these deficiencies, the application stands in direct conflict 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 face adverse effects undermines compliance with national policy.

Collectively, these factors contribute to the conclusion that the assessment does not fulfil the statutory requirements necessary to support a determination. The standard of beyond reasonable scientific doubt has not been achieved, thereby engaging the precautionary principle and precluding a lawful conclusion in favour of consent.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment presented fails to adequately recognise the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply intertwined. Rather than appreciating the dynamic social, cultural, and spiritual roles that heritage plays, the application reduces heritage to isolated, static elements, overlooking their ongoing significance within the community.

A notable shortcoming is the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, which serve as active sites of burial and spiritual practice. The assessment incorrectly categorises these as static features, neglecting their continuous use and the implications of development on their surrounding environment. This misunderstanding leads to an incomplete appraisal of cultural effects, disregarding their integral part in community life.

The absence of consideration for intangible cultural heritage, which encompasses the Gaelic language, traditions, and the community's enduring connection to the coastal environment, further compounds these issues. These aspects are vital to the area's identity yet are entirely overlooked in the assessment, representing a considerable gap. Without addressing these essential elements, the true cultural impact of the development remains misunderstood.

Concerns also arise regarding community rights and participation. The Gaelic-speaking population, which embodies a distinct cultural identity akin to that of Indigenous Peoples, has not been involved in a Free, Prior and Informed Consent process. This lack of genuine engagement calls into question the validity of the assessment and neglects established principles that govern participation in matters affecting cultural and environmental interests.

Moreover, a critical procedural oversight is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The failure to conduct this assessment prevents the competent authority from fulfilling its legal obligations to evaluate the social, cultural, and economic impacts on the island community, rendering a lawful determination impossible.

From a policy standpoint, these shortcomings place the proposal at odds with National Planning Framework 4, particularly regarding the safeguarding of historic assets and locations. The neglect of both tangible and intangible heritage, along with the failure to recognise living cultural practices, signifies a clear deviation from established policy requirements.

Ultimately, the disregard for living heritage, intangible cultural values, community rights, and statutory obligations culminates in a significant evidential gap. The cultural impacts of the proposed development have not been sufficiently assessed, and the application lacks the necessary foundation for an accurate evaluation of the genuine cultural cost associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The full report of the Social Impact Assessment commissioned by the developer remains unpublished, leading to a significant evidential gap. This lack of transparency not only inhibits the public's understanding but also hinders the competent authority's ability to fully assess the social risks identified through the developer's own engagement with local residents. Summaries suggest that community members are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These findings are drawn from direct community engagement, which underscores their relevance and validity. However, without the complete assessment, proper scrutiny of these impacts is not possible, limiting the determination of their significance within the overall decision-making process.

Additionally, the proposal is viewed as a potential threat to community identity and cohesion, with references to "cultural loss" highlighted in the developer's findings. Despite this, such impacts have not been adequately considered or given sufficient weight in the application. The omission of the full Social Impact Assessment obscures the genuine human and social costs associated with the development, undermining the integrity of the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this scale, particularly in relation to community character and functioning.

From a policy standpoint, the application fails to align with National Planning Framework 4 regarding health and wellbeing. Developments must promote positive health outcomes and mitigate harm, yet the evidence currently available points to adverse effects that have not been disclosed. Without the full assessment, it is impossible to demonstrate compliance with these policy requirements.

The procedural implications are substantial. The competent authority is unable to conduct a comprehensive socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a material omission in the application, failing to meet the evidential standards set by the Environmental Impact Assessment regime. Collectively, the non-disclosure of the full Social Impact Assessment, combined with the evidence of existing adverse impacts, renders the assessment incomplete and unreliable, ultimately preventing a lawful determination and underscoring that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment concerning the seascape, landscape, and visual impacts associated with the proposal is significantly lacking and does not sufficiently reflect the extent of change or the sensitivity of the surrounding environment. The West Lewis coastline is characterised by its open Atlantic horizon, its undeveloped nature, and a pronounced sense of remoteness. Introducing large-scale turbines near the shoreline would result in

a continuous industrial presence, fundamentally transforming this character and leading to a permanent and irreversible alteration of the landscape.

Moreover, the application fails to accurately depict the magnitude of the visual changes that would occur. Given the scale and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations, thereby directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment does not adequately convey the significance of this impact within the context of such a sensitive landscape.

Methodological issues also arise concerning the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not fully capture the most sensitive receptors or represent worst-case scenarios, especially in relation to important cultural heritage sites and high-value landscapes. This raises concerns that the actual magnitude of visual impact has been understated, thereby compromising the assessment's reliability.

Additionally, there is a failure to assess the interconnected relationship between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments form part of a broader landscape that is visually and spatially linked to the Atlantic horizon. The assessment treats these as isolated assets and does not recognise their interdependence, leading to 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 severing their connection to the natural horizon. This constitutes not just a visual impact, but also a broader cultural and spatial harm that has not been adequately evaluated in the application.

From a policy standpoint, the proposal contradicts National Planning Framework 4, particularly concerning the protection of natural spaces and historic assets. The extent of change is at odds with the necessity to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertions of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and inescapable. Consequently, the 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 reflect the scale of impact, the

sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal has significant deficiencies regarding the assessment of construction and pollution risks, which ultimately hampers the evaluation of potential environmental effects. The absence of detailed Construction Environmental Management Plans and Pollution Prevention Plans is alarming, particularly given the high-energy Atlantic environment in which substantial seabed preparation and installation works are to occur. Instead of providing a thorough analysis, the application defers key mitigation and contingency measures to a post-consent stage, which prevents any meaningful evaluation of their sufficiency or effectiveness.

The concerns are amplified by the sensitivity of the receiving environment along the West Lewis coastline, which hosts clean coastal waters and vital habitats that are susceptible to sediment disturbance and contamination. Although the application recognises potential risks such as sediment mobilisation and accidental spills of chemicals or oil, it fails to adequately outline how these threats will be prevented, controlled, or monitored.

Moreover, there is considerable uncertainty regarding the extent 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 potential ecological effects or the duration and extent of these impacts. This uncertainty extends to marine species and habitats identified as sensitive within the wider assessment.

The lack of detailed emergency response procedures further exacerbates these issues. By postponing the development of contingency planning until after consent is granted, the application undermines the ability to assess whether sufficient safeguards are in place for pollution events. This introduces significant procedural risks and limits the competent authority's ability to evaluate environmental protection measures at the time of decision-making.

From a regulatory standpoint, the deferment of essential environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime, which mandates that significant effects and necessary mitigations be assessed prior to consent. The absence of critical information means that a lawful determination cannot be reached. Additionally, the application does not demonstrate compliance with existing policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, insufficient management plans, and the uncertainty regarding potential impacts collectively render the environmental assessment inadequate. These shortcomings obstruct a thorough examination of construction and pollution risks and support the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment concerning fisheries and marine life is inadequate, resulting in a failure to provide a solid evaluation of the ecological and socio-economic impacts associated with the proposal. The waters off the West Lewis coast are home to a vibrant marine ecosystem and support an active fishing industry. However, the application does not adequately demonstrate that these vital uses and habitats can be preserved or maintained without experiencing significant disruption.

A significant concern is the flawed assumption that fishing activities can be relocated without negative consequences. The application lacks evidence to prove that alternative fishing grounds are available, accessible, or capable of withstanding additional pressures. This oversight is critical, as displacing fishing activity 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 assessment, the potential impacts on fisheries and the livelihoods reliant on them remain unclear.

Furthermore, the proposal poses notable risks to marine species, particularly due to the underwater noise generated during construction activities. The use of high-energy hammer piling over an extended timeframe is likely to disturb a wide range of marine life, notably impacting species such as dolphins. The projected disturbances to a considerable portion of the local bottlenose dolphin population raise urgent concerns; yet, the application minimizes the significance of these effects without presenting sufficient supporting evidence.

The application also reveals a contradiction, as it acknowledges the necessity for licenses to allow harm to European Protected Species, while simultaneously downplaying the anticipated impacts as negligible. This inconsistency undermines the credibility of the assessment and raises doubts about compliance with the Habitats Regulations, especially in cases where harm is expected to a level that necessitates legal permission.

Moreover, the assessment neglects to consider cumulative impacts resulting from multiple pressures, such as habitat disturbance, noise, and the displacement of fishing activities. In the absence of a comprehensive evaluation of these combined effects, it is

impossible to ascertain the overall impact on marine ecosystems and the socio-economic landscape.

From a policy standpoint, the application fails to demonstrate compliance with the National Planning Framework 4 and the National Marine Plan. It does not illustrate that the development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity, which obstructs any conclusion that the proposal represents sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application does not provide evidence that the necessary consents or processes for routing infrastructure through active croft land have been initiated, which raises significant questions about deliverability and lawful implementation. This issue highlights the potential for conflicts with existing land use and legal rights, further complicating the project's viability.

The assessment of onshore infrastructure remains materially incomplete, failing to consider the full extent of impacts arising from what constitutes a single integrated project. The offshore turbines and onshore works are intrinsically linked yet assessed separately, leading to a fragmented approach that obscures the true scale of environmental and socio-economic effects.

There are significant risks posed to sensitive habitats, including machair systems and peatland environments, which are subject to policy protection. The application does not demonstrate that impacts on these habitats have been fully assessed or that appropriate avoidance measures have been applied, creating a clear evidential gap in relation to biodiversity protection.

Concerns regarding carbon balance are also prominent in this proposal. Disturbance of peatland releases stored carbon, potentially resulting in a carbon debt that contradicts the objectives of renewable energy development. The application fails to adequately address this issue or to demonstrate that the overall carbon balance remains beneficial.

By excluding or deferring the assessment of onshore impacts, the application undermines the ability to evaluate cumulative effects properly. The Environmental Impact Assessment process mandates that all components of a project be considered

together; however, the separation of offshore and onshore elements results in a failure to fully understand the combined impacts on peatlands, habitats, and communities.

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

Ultimately, 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, hindering a lawful determination. The need for immediate action in addressing these critical issues cannot be overstated.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which play a vital role in the area's environmental quality, cultural identity, and tourism value. The proposed project 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. This change would fundamentally alter the night-time environment, yet the application fails to assess the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. Given the significance of dark skies to the region's identity and the emerging tourism sector of astro-tourism, this omission is especially troubling.

Moreover, there is no evaluation of how this lighting would affect nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are highly sensitive to artificial lighting due to phototaxis, which can result in disorientation and increased collision risk. The application lacks a lighting impact assessment or a phototaxis study, failing to examine how aviation lighting might impact these species or contribute to mortality rates.

Additionally, the ornithological assessment relies on daytime survey data, which does not capture nocturnal activity or the associated risks. Other species, such as Kittiwakes, which may forage or migrate at night, are also vulnerable to disorientation caused by artificial lighting, yet this risk remains unassessed. Without site-specific night-time data, there is a critical gap in understanding the ecological impacts.

The failure to consider nocturnal impacts raises significant concerns about whether protected species or designated sites could be adversely affected. The evidential standard required to demonstrate the absence of adverse effects beyond reasonable

scientific doubt is not met, invoking the precautionary principle and thereby obstructing a lawful determination.

From a policy standpoint, the absence of this assessment conflicts with the National Planning Framework 4 regarding the protection of natural places and the quality of the environment. Furthermore, 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 assessment concerning dark skies and nocturnal wildlife creates a substantial evidential gap. The absence of baseline data, impact modelling, and species-specific analysis means the application is incomplete and cannot support a lawful determination.

SUMMARY

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

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

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

The proposal stands in direct opposition to the National Planning Framework 4, failing to demonstrate adequate protection for biodiversity, natural places, and cultural heritage.

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

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

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

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

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

Additional Comments

The destruction and impact on the island and its flora and fauna is totally unacceptable. The only winners will be the huge overseas corporations cashing in on a farcical development.

Why are the Scottish government selling us off without due care and diligence? They should be ashamed of this monstrosity if it goes ahead on their watch. Please see sense and don't give approval.

Thank you

Member of Public 263

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 application is situated off the west side of the Isle of Lewis, an area distinguished by its Atlantic-facing coastline and a strong cultural identity, as well as its near-pristine environment. A thorough review of the Environmental Impact Assessment Report and supporting documents reveals significant planning, environmental, cultural, and procedural deficiencies that cannot be overlooked.

The proposed development raises serious concerns regarding its compatibility with statutory requirements, national policy, and the principles of sustainable development. The application lacks an adequate evidential basis for lawful determination. Critical

environmental data is absent, with baseline information being limited and inconsistent. Furthermore, key aspects of the proposal remain undefined, which obscures the potential significant effects of the development. The reliance on a flexible design framework, alongside mitigation measures that have yet to be specified, prevents an accurate assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, leaving unsupported claims regarding negligible or non-significant effects.

There are also clear and serious conflicts with established policy. The proposal 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. 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 and hinder the competent authority's ability to deem the development acceptable in policy terms.

The unprecedented scale of the proposal presents major challenges, with large turbines situated close to the shoreline. This proximity raises significant concerns related to 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 incapable of supporting a lawful determination. In this context, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presented is inadequate and fails to deliver a comprehensive, transparent, or dependable evaluation of the likely environmental consequences of the proposed development. The approach utilising a flexible Project Design Envelope, devoid of specific turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This situation obstructs the consistent application of a worst-case scenario analysis and compromises the integrity of the assessment. Consequently, the impacts detailed may not accurately represent the development that may ultimately be constructed, hindering both public understanding and the competent authority's ability to grasp the true magnitude of the environmental effects.

Moreover, the application places substantial reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. The request for consent is predicated on the assumption that environmental harm will be resolved at a later date, which precludes any meaningful assessment of the effectiveness of these

measures or evaluation of residual impacts. This deferral of essential information to stages following consent is procedurally unacceptable, undermining the objective of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies must be clearly established prior to determination.

Significant evidential deficiencies exist within the assessment, including gaps in baseline data, methodological limitations, and the reliance on assumptions rather than site-specific evidence. This results in uncertainty surrounding the scale and significance of impacts, particularly when conclusions of negligible or non-significant effects are posited without robust supporting evidence. The insufficiency of information obstructs a clear comprehension of cumulative and worst-case impacts, fostering scientific uncertainty that contravenes statutory obligations.

As a result of these issues, the application does not satisfy the evidential standard set forth under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate adherence to National Planning Framework 4, including mandates related to biodiversity protection and environmental integrity, as it cannot establish that impacts have been thoroughly assessed or that appropriate safeguards are in place.

Collectively, the reliance on an ill-defined design envelope, the lack of specified mitigation measures, and the existence of gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings obstruct a lawful and rigorous assessment of environmental effects, leaving the competent authority unable to make a determination based on the information supplied.

MARINE ECOLOGY AND PROTECTED SPECIES

The application demonstrates significant deficiencies in the assessment of marine ecology and protected species, particularly concerning its understanding of ecological receptors in the sensitive and biologically active environment of West Lewis coastal waters. The methodologies employed are inadequate, leading to an incomplete baseline that fails to capture crucial details such as species presence, behaviour, and habitat use.

Notably, the assessment neglects to properly recognise otters, a European Protected Species, in their active utilisation of coastal areas for foraging and movement. This oversight extends to an inadequate consideration of their core foraging range and behavioural patterns, resulting in an insufficient evaluation of potential impacts from construction disturbances, noise, and increased human activity. Consequently, the

assessment's conclusions regarding the absence of significant effects on otters lack a solid evidential basis.

Further issues arise in the evaluation of basking sharks, where the reliance on aerial surveys leads to a substantial detection bias, particularly in the challenging conditions of the Atlantic. This method is prone to underestimating the presence of basking sharks when juxtaposed with well-documented land-based observations that demonstrate their frequent use of these waters. The failure to adequately incorporate or consider such pertinent data results in an incomplete baseline and undermines the validity of the conclusions drawn.

These methodological shortcomings result in determinations of negligible or non-significant effects that rely more on assumptions than on robust evidence. Additionally, the lack of comprehensive baseline data hinders meaningful assessments of cumulative and indirect impacts, including variations due to seasonal changes and broader ecosystem interactions. This uncertainty raises concerns about the true risks faced by marine species and their habitats.

From a regulatory standpoint, the application does not align with the stipulations of the Environmental Impact Assessment regime and the National Planning Framework 4, as there has been an inadequate identification and assessment of protected species. The uncertainty introduced by these deficiencies prevents the exclusion of potential adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Thus, the issuance of consent cannot be justified within the legal framework.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions collectively renders the assessment unreliable. These shortcomings impede a thorough evaluation of impacts on marine ecology and protected species, ultimately leading to the conclusion that the application is unsupported by a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment related to the proposed development is profoundly inadequate, exhibiting numerous internal inconsistencies and significant evidence gaps that undermine its findings. 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 convincingly demonstrate that these species will not suffer adverse effects. This development is situated in key foraging areas and migratory paths, yet the assessment does not thoroughly explore the implications of displacement, collision risk, or habitat loss.

A striking contradiction arises within the application itself, where the developer claims that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is necessary only when significant harm is anticipated. Such inconsistencies cast doubt on the reliability of the assessment, suggesting that the conclusions drawn are not supported by adequate evidence. Furthermore, the assessment lacks sufficient proof that seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, will be unaffected. The critical importance of these feeding grounds has not been fully recognised, and the reliance on modelling techniques introduces further uncertainty, particularly concerning species in severe decline, such as Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality rates, especially when baseline data is incomplete and the behavioural responses of the species are not well understood.

The placement of turbines within a recognised migratory corridor presents an additional, significant risk, as it effectively creates a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The application fails to adequately assess the long-term consequences 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 criteria necessary to ascertain that there will be no adverse effects on the integrity of protected sites. The presence of contradictory findings, combined with 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, hindering any lawful conclusion that might support consent.

The identified deficiencies further indicate a failure to comply with the National Planning Framework 4, specifically 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 contradiction with national policy.

Collectively, these issues render the assessment unreliable, characterised by internal inconsistencies, methodological flaws, and insufficient evidence. These shortcomings obstruct a thorough evaluation of the impacts and lead to the conclusion that the application does not fulfil the statutory requirements essential for determination.

CONSTRUCTION AND POLLUTION RISKS

The proposal entails substantial seabed preparation and installation works within a high-energy Atlantic environment. However, the assessment of construction and pollution risks is incomplete, lacking the detail necessary to evaluate potential

environmental effects. The application does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans, instead relying on mitigation and contingency measures that will be prepared post-consent. This approach obstructs any meaningful assessment of their adequacy or effectiveness.

Particularly alarming is this reliance on undefined future measures, given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. While the application does acknowledge risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate information on how these risks will be prevented, controlled, or monitored.

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, 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 been previously identified as sensitive within the wider assessment.

The absence of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning until after consent, the application impedes the evaluation of whether appropriate safeguards are in place to address pollution events. This creates procedural risk and undermines the competent authority's capacity to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards is inconsistent with the requirements of the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation measures are assessed prior to consent; without this information, a lawful determination cannot be made. The application also fails to demonstrate compliance with policy requirements relating to environmental protection and water quality.

Taken as a whole, the lack of defined mitigation measures, inadequate management plans, and uncertainty concerning potential impacts render the assessment materially deficient. These shortcomings hinder a thorough evaluation of construction and pollution risks and further reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal presents significant deficiencies in the assessment of fisheries and marine life, failing to offer a thorough evaluation of the ecological and socio-economic impacts on the waters off the West Lewis coast. This area supports a vibrant marine

ecosystem and an active fishing industry, yet the application does not adequately demonstrate how these vital uses and habitats will be protected or maintained without facing substantial disruption.

A critical concern is the flawed assumption that fishing activities can be easily displaced without any repercussions. The application lacks evidence to suggest that alternative fishing grounds are available or capable of accommodating additional pressure. This significant omission raises the risk of overfishing in other areas and could have broader economic implications for the local fishing fleet. Without a clear, evidence-based assessment, the potential impacts on fisheries and the livelihoods of those dependent on them remain poorly understood.

Furthermore, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated by construction activities. The anticipated high-energy hammer piling over an extended period is likely to cause disturbances over vast distances, adversely affecting species such as dolphins. The forecasted impact on a significant portion of the local bottlenose dolphin population is alarming; however, the application minimises these effects without providing sufficient supporting evidence.

The application reveals an inconsistency regarding the necessity for licences to permit harm to European Protected Species while simultaneously describing those impacts as negligible. This contradiction seriously undermines the credibility of the assessment and raises concerns about compliance with the Habitats Regulations, especially where potential harm necessitates legal authorisation.

Additionally, the assessment neglects to address cumulative impacts resulting from multiple pressures, such as habitat disturbance, noise, and displacement of fishing activities. The failure to comprehensively evaluate these combined effects means that the overall impact on marine ecosystems and socio-economic conditions cannot be accurately determined.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 or the National Marine Plan. It does not prove that the development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, thus hindering any conclusion regarding the proposal's sustainability.

Overall, the lack of evidence related to fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the assessment render it incomplete and unreliable. These shortcomings obstruct a proper evaluation of the potential impacts on marine life and fisheries.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is renowned for its exceptionally dark skies, which are integral to the environmental quality, cultural identity, and tourism value of the area. However, the Environmental Impact Assessment lacks any evaluation of dark skies and nocturnal wildlife, which constitutes a material omission. The proposal incorporates permanent red aviation lighting that is visible over extensive distances, resulting in a disruptive "wall of light" effect across the western horizon that would significantly alter the night-time environment.

There has been no assessment of how this lighting would affect visual amenity, landscape character, or the experiences of residents and visitors. This is particularly concerning given the significance of dark skies to the region's identity and the growing tourism sector focused on astro-tourism. The absence of consideration for these factors leads to a clear deficiency in the overall landscape and environmental assessment.

Moreover, there is a lack of analysis regarding the impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can lead to disorientation and heightened collision risks. The application does not present any lighting impact assessment or phototaxis study, failing to investigate how aviation lighting may influence these species or contribute to increased mortality rates.

This gap is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which does not account for nocturnal activity or the associated risks. For instance, Kittiwakes, which may forage or migrate during the night, are also susceptible to disorientation from artificial lighting. However, this risk has not been evaluated. The lack of site-specific night-time data creates a significant void in understanding the ecological impacts.

Without an assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites may be adversely affected. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt cannot be fulfilled, thereby invoking the precautionary principle and obstructing a lawful determination.

From a policy standpoint, these omissions conflict with the National Planning Framework 4 regarding the protection of natural places and environmental quality. Furthermore, they undermine the comprehensive assessment of landscape and seascape impacts, as the night-time character is a vital aspect of the environment.

In conclusion, the failure to assess 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 unable to support a lawful determination.

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.

Member of Public 264

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 marine licensing and Environmental Impact Assessment regimes. The proposal raises serious concerns regarding its alignment with statutory requirements, national policy, and sustainable development principles. It 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 lacks an adequate evidential basis for lawful determination, as it omits critical environmental data, and baseline information is both limited and inconsistent. Key elements of the proposal remain undefined, and the use of a flexible design framework obscures an understanding of likely significant effects. Furthermore, the reliance on unspecified mitigation measures prevents an assessment of their effectiveness. This results in documentation that fails to provide a comprehensive understanding of environmental, cultural, or community impacts, with claims of negligible or non-significant effects unsupported by robust evidence.

There are also substantial policy conflicts to address. 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 for protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly impact the statutory tests needed for consent and impede the competent authority's ability to deem the development acceptable in policy terms.

The proposal's scale is unprecedented for this region, with large turbines positioned close to the shoreline, raising significant concerns about landscape capacity, visual dominance, and environmental impacts. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance illustrates that the application is incomplete and does not support a lawful determination. In light of these issues, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presented is inadequate and fails to deliver a comprehensive, transparent, or dependable evaluation of the likely environmental consequences of the proposed development. The approach utilising a flexible Project Design Envelope, devoid of specific turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This situation obstructs the consistent application of a worst-case scenario analysis and compromises the integrity of the assessment. Consequently, the impacts detailed may not accurately represent the development that may ultimately be constructed, hindering both public understanding and the competent authority's ability to grasp the true magnitude of the environmental effects.

Moreover, the application places substantial reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. The request for consent is predicated on the assumption that environmental harm will be resolved at a later date, which precludes any meaningful assessment of the effectiveness of these measures or evaluation of residual impacts. This deferral of essential information to stages following consent is procedurally unacceptable, undermining the objective of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies must be clearly established prior to determination.

Significant evidential deficiencies exist within the assessment, including gaps in baseline data, methodological limitations, and the reliance on assumptions rather than site-specific evidence. This results in uncertainty surrounding the scale and significance of impacts, particularly when conclusions of negligible or non-significant effects are posited without robust supporting evidence. The insufficiency of information obstructs a clear comprehension of cumulative and worst-case impacts, fostering scientific uncertainty that contravenes statutory obligations.

As a result of these issues, the application does not satisfy the evidential standard set forth under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate adherence to National Planning Framework 4, including mandates related to biodiversity protection and environmental integrity, as it cannot establish that impacts have been thoroughly assessed or that appropriate safeguards are in place.

Collectively, the reliance on an ill-defined design envelope, the lack of specified mitigation measures, and the existence of gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings obstruct a lawful and rigorous assessment of environmental effects,

leaving the competent authority unable to make a determination based on the information supplied.

ASSESSMENT OF ALTERNATIVES

The application's assessment of alternatives is fundamentally lacking and does not satisfy the statutory requirements set forth by the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives in terms of their environmental impacts, the documentation provides a narrative on the project's evolution. This method does not adequately demonstrate that less harmful options have been properly identified, assessed, and selected over more damaging alternatives.

There is no transparent or evidence-based evaluation of alternative offshore locations, development scales, or design configurations. Notably, the application fails to show that the developer has seriously explored the possibility of placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be mitigated. Considering the sensitivity of the West Lewis coastline and the significant role that proximity to shore plays in assessing impact, the lack of such an analysis precludes any determination that the proposed siting is the least damaging option.

These shortcomings also extend to the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly examined to avoid or lessen impacts on sensitive receptors, including areas of cultural and spiritual significance, such as Barvas Cemetery. The absence of a clear strategy for avoidance and the lack of comparative analysis reveal that mitigation by design has not been implemented, with reliance instead on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through site selection, layout, and infrastructure routing. This signifies a failure to adhere to the established mitigation hierarchy and hinders the competent authority's ability to ascertain whether less harmful and more suitable alternatives exist. In the absence of a comprehensive alternatives assessment, it cannot be concluded that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this inadequacy compromises adherence to National Planning Framework 4, particularly regarding the protection of natural places, cultural heritage, and community wellbeing. The failure to conduct a structured and comparative assessment is a significant omission that contributes to the overall conclusion that the application has not been sufficiently evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species reveals significant deficiencies that undermine its reliability and effectiveness. This coastal environment of West Lewis is particularly sensitive and biologically rich, yet the baseline data presented is inadequate. The methodologies used fail to comprehensively capture the presence, behaviour, and habitat usage of key species. Consequently, this shortfall renders any assessment of impacts to be speculative rather than grounded in solid evidence.

Otters, classified as a European Protected Species, are notably overlooked in this assessment. The application neglects to properly evaluate their active foraging and movement patterns along the coast. The absence of an assessment of their core foraging range means that potential disturbances from construction activities, noise, and increased human presence have not been sufficiently evaluated. This oversight fundamentally weakens any claims made regarding the lack of significant effects on otters.

In addition, the evaluation of basking sharks suffers from methodological flaws. The reliance on aerial surveys, particularly in challenging Atlantic weather conditions, introduces a significant bias in detection rates. This approach is likely to underestimate the actual presence of basking sharks in the area, especially when juxtaposed with established land-based observations that highlight their frequent utilisation of these waters. Such omissions further compromise the baseline data and diminish the credibility of the conclusions drawn.

The inadequacies in methodology result in conclusions of negligible or non-significant effects that are more reliant on assumptions than on robust scientific evidence. Furthermore, the lack of adequate baseline data hampers the ability to assess cumulative and indirect impacts, seasonal variations, and interactions within the wider ecosystem. This creates a substantial degree of uncertainty regarding the real risks posed to marine species and their habitats.

From a regulatory standpoint, the application does not fulfil the obligations set out in the Environmental Impact Assessment regime and National Planning Framework 4. The failure to appropriately identify and assess protected species leads to heightened uncertainty, making it impossible to exclude adverse effects beyond reasonable scientific doubt. The application thus engages the precautionary principle, indicating that consent cannot be granted lawfully.

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

unsupported conclusions renders the assessment untrustworthy. These significant deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species, reinforcing the conclusion that the application lacks a solid evidential foundation.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment concerning social impacts, health, and wellbeing is significantly inadequate and lacks the transparency necessary for a lawful evaluation. Although the developer has commissioned a Social Impact Assessment that included focus groups with local residents, the complete report has not been made available. This creates a substantial evidential gap, hindering both public understanding and that of the competent authority regarding the full range of social risks identified in the developer's own research.

There is evidence suggesting that residents are currently facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement and are thus not conjectural. However, the non-disclosure of the full assessment inhibits proper scrutiny of the findings, limiting the capacity to evaluate their significance in the decision-making process.

Moreover, the proposal is perceived as a direct threat to community identity and cohesion, with "cultural loss" acknowledged in the developer's findings. Despite this, such impacts have not been adequately incorporated into the main application or given the necessary consideration. The failure to disclose the complete Social Impact Assessment obscures the genuine human and social costs associated with the development.

This lack of transparency detracts from the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health impacts is vital for developments of this magnitude, especially where community character and functionality may be compromised. By not providing the complete dataset, the application does not offer a thorough evidential foundation for assessing the balance between benefits and harms.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Developments must foster positive health outcomes and mitigate harm, yet the available evidence suggests existing adverse effects that remain partially undisclosed. Without the full assessment, compliance with this policy cannot be verified.

The procedural implications of this situation 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 significant 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, coupled with evidence of existing adverse impacts, results in an assessment that is both incomplete and unreliable. This situation hinders a lawful determination and reinforces the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The application fails to adequately convey the scale of impact on the seascape, landscape, and visual amenity, which is a critical oversight given the sensitivity of the 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 close to the shoreline, would introduce an industrial presence that would permanently and irreversibly alter the landscape's character.

The visual change resulting from the introduction of these turbines is not sufficiently represented in the assessment. Their scale and proximity would dominate views from residential areas, historic sites, and popular coastal locations, thereby eroding the defining qualities of naturalness and remoteness. The assessment neglects to properly articulate the significance of this impact within the context of such a sensitive landscape.

Methodological issues are evident in the selection and presentation of visual viewpoints. It appears that these viewpoints do not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the concern that the visual impact may be understated, thus compromising the reliability of the overall assessment.

Furthermore, there is a failure to assess the interconnected relationship between the landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments exist within a wider landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these sites in isolation, neglecting their interdependence and leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would sever these vital relationships, altering how heritage assets are perceived and disrupting their connection to the natural horizon. This represents a significant cultural and spatial harm that has not been

adequately evaluated in the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, specifically regarding the protection of natural places and historic assets. The magnitude of change is incompatible with the obligations to protect landscape character, visual amenity, and the settings of culturally significant sites. Moreover, the absence of a rigorous worst-case assessment further undermines any assertions of compliance with policy requirements.

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, resulting in a fundamental and permanent change that cannot be reduced to an acceptable level through mitigation measures.

In summary, the assessment is deficient in accurately representing the scale of impact, the sensitivity of the environment, and the interrelated nature of landscape and heritage. These shortcomings hinder a reliable evaluation and strengthen the argument that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline is home to clean coastal waters and important habitats that are particularly vulnerable to sediment disturbance and contamination. 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 potential environmental effects.

The application does not provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on unspecified mitigation and contingency measures to be prepared after consent, which hinders any meaningful assessment of their adequacy or effectiveness. This reliance on undefined future measures is troubling, especially given the sensitive nature of the receiving environment.

There are acknowledged risks such as sediment mobilisation and accidental chemical or oil spills, but the application 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 determine the extent, duration, or ecological effects of these potential impacts. This uncertainty also extends to the likely effects on marine species and habitats identified as sensitive in the broader assessment.

The absence of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning to a post-consent phase, the application impedes the assessment of whether appropriate safeguards are in place to manage pollution events. This introduces procedural risk and undermines the capacity of the competent authority to evaluate environmental protection measures during the determination process.

From a regulatory standpoint, deferring critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and the related mitigation must be evaluated prior to consent; without such information, a lawful determination cannot be achieved. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The application presents significant shortcomings in its assessment of fisheries and marine life, which fails to offer a thorough evaluation of both ecological and socio-economic impacts. It has been established that 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 how these crucial uses and habitats can be preserved or maintained without considerable disruption.

A notable concern lies in the assumption that fishing activities can be displaced without negative repercussions. The application lacks evidence to support the claim that alternative fishing grounds are both available and capable of withstanding additional pressure. This gap in information is critical, as such displacement could lead to overfishing in other areas and may have broader economic implications for the local fishing fleet. The absence of a clear, evidence-based assessment means that the potential impacts on fisheries and local livelihoods remain poorly understood.

Moreover, the proposal poses significant risks to marine species, especially through the underwater noise generated during construction activities. The anticipated high-energy hammer piling, conducted over an extended duration, is expected to disturb marine life over large distances, particularly affecting species like dolphins. The predicted

disruption to a substantial portion of the local bottlenose dolphin population raises grave concerns, yet the application seems to downplay the significance of these potential effects, lacking sufficient evidence to support such minimisation.

There is also a striking inconsistency within the application, as it acknowledges the necessity for licenses to permit harm to European Protected Species while simultaneously characterising the impacts as negligible. This contradiction raises doubts about the credibility of the assessment and raises alarm over compliance with the Habitats Regulations, particularly concerning anticipated harm that would require legal authorisation.

Additionally, the assessment neglects to consider the cumulative impacts that arise from various pressures, including habitat disturbance, noise, and the displacement of fishing activity. 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 alignment 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 consequences for marine biodiversity, thus undermining any conclusion that the proposal constitutes sustainable development.

In summary, the deficiencies concerning evidence on fishing displacement, the underestimation of acoustic impacts, and internal inconsistencies render the assessment incomplete and unreliable. These flaws ultimately inhibit a robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the project's onshore infrastructure is fundamentally flawed and does not account for the full range of impacts stemming from what constitutes a single integrated project. The offshore turbines are intrinsically connected to the onshore works, yet the assessment treats them separately, leading to a disjointed approach that conceals the true extent of environmental and socio-economic consequences.

The proposed onshore elements involve significant activities such as cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure traversing sensitive landscapes. These activities entail excavation in deep peat areas, particularly within Barvas Moor, an important carbon store and ecologically sensitive habitat. The application fails to provide a thorough assessment of these impacts, which obstructs a complete understanding of

the project's overall environmental footprint.

Moreover, the application excludes a comprehensive evaluation of onshore impacts, hindering the proper assessment of cumulative effects. The Environmental Impact Assessment framework necessitates that all parts of a project be considered collectively; however, the disjunction between offshore and onshore components results in an insufficient understanding of combined impacts on peatlands, habitats, and local communities.

There are considerable risks posed to sensitive habitats, including machair systems and peatland environments that are subject to policy protection. The application does not adequately demonstrate that impacts on these habitats have been thoroughly assessed, nor does it show that appropriate avoidance measures have been enacted, creating a significant evidential gap concerning biodiversity protection.

Concerns regarding carbon balance are also paramount. Disturbing peatland releases sequestered carbon, which could lead to a carbon debt that contradicts the goals of renewable energy initiatives. The application does not sufficiently address this matter or prove that the overall carbon balance is advantageous.

Additionally, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application lacks evidence that the necessary consents or processes have been pursued, casting doubt on its deliverability and legal viability.

From a policy standpoint, the failure to evaluate the project holistically 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 erodes the application's credibility.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal fails to include any assessment of nocturnal wildlife, which is critical given that species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly vulnerable to artificial lighting. The impacts of this lighting, specifically its potential to disorient these species and increase the risk of collision, have not been evaluated. Additionally, the ornithological assessment is based solely on

daytime survey data, neglecting nocturnal activity and the associated risks. Kittiwakes, which may forage or migrate at night, are also at risk of disorientation due to artificial lighting, yet this has not been considered. The lack of site-specific night-time data creates a significant gap in understanding the ecological impacts.

The introduction of permanent red aviation lighting visible over long distances would create a continuous and intrusive “wall of light” across the western horizon, fundamentally altering the night-time environment of the West Lewis coastline. This area is characterised by exceptionally dark skies, which play a vital role in environmental quality, cultural identity, and tourism value. The application does not address the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. The omission of such assessments is significant, particularly as dark skies are important for the area’s identity and for emerging sectors such as astro-tourism.

This lack of assessment leads to a clear gap in the overall landscape and environmental evaluation. Without understanding the nocturnal impacts, it is impossible to determine if protected species or designated sites may be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt cannot be achieved, which engages the precautionary principle and complicates lawful determination.

Moreover, from a policy standpoint, the absence of this assessment conflicts with National Planning Framework 4, which emphasises the protection of natural places and environmental quality. The oversight also undermines the broader assessment of landscape and seascape impacts since the night-time character is an integral aspect of the environment.

In summary, the lack of any assessment regarding dark skies and nocturnal wildlife presents a significant 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 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.

Member of Public 265

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 regimes. A thorough review of the Environmental Impact Assessment Report and accompanying documentation reveals significant planning, environmental, cultural, and procedural deficiencies associated with the development. Located off the west side of the Isle of Lewis, the area is characterised by its Atlantic-facing coastline, near-pristine environment, and robust cultural identity. The proposal's scale, proximity to the shoreline, and design raise serious concerns about its compliance with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for a lawful determination. It presents critical gaps in environmental data, and baseline information is both limited and inconsistent. Many key aspects of the proposal remain undefined, leading to ambiguity regarding likely significant effects. The flexible design framework employed complicates the assessment further, as it relies on unspecified mitigation measures, rendering it impossible to evaluate their effectiveness. Consequently, the documentation fails to provide a complete understanding of potential environmental, cultural, or community impacts, and assertions of negligible or non-significant effects are unsupported by credible evidence.

Moreover, the application shows clear conflicts with established policies. 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 applicant has not sufficiently demonstrated compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These policy conflicts are directly relevant to the statutory tests required for consent and weaken the competent authority's ability to conclude that the development is acceptable in policy terms.

The unprecedented scale of the proposal, with large turbines situated close to the shoreline, raises substantial concerns about landscape capacity, visual dominance, and overall environmental impact. The combination of insufficient information, reliance 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 should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and does not deliver a full, transparent, or dependable account of the potential environmental effects associated with the proposal. The flexible Project Design Envelope employed in the application, which does not commit to specific turbine dimensions, layouts, or configurations, creates substantial uncertainty. This uncertainty obstructs the consistent application of a worst-case scenario, thereby undermining the integrity of the assessment. Consequently, the impacts outlined may not accurately represent the development that will ultimately be constructed, hindering both public understanding and that of the competent authority regarding the true extent of the environmental effects.

Furthermore, the application is predominantly dependent on mitigation measures, monitoring strategies, and management plans that are not yet defined. Seeking consent on the premise that environmental harm will be addressed at a later stage obstructs any substantial evaluation of the effectiveness of these measures or assessment of residual impacts. This postponement of crucial information to post-consent stages is procedurally unacceptable, contradicting the intent of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be clearly established before determination.

Additionally, there are significant evidential gaps, including deficiencies in baseline data, limitations in methodology, and a reliance on assumptions rather than site-specific evidence. This results in uncertainty regarding the magnitude and significance of impacts, especially in cases where negligible or non-significant effects are presented without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, leading to scientific uncertainty that cannot be aligned with statutory requirements.

As a result, the application does not meet the evidential threshold stipulated under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. The proposal also fails to demonstrate adherence to National Planning Framework 4, including stipulations regarding biodiversity protection and environmental integrity, as it remains unclear whether impacts have been thoroughly assessed or appropriate safeguards implemented.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings preclude a lawful and robust assessment of environmental effects, leaving the competent authority unable to make a determination based on the information available.

ASSESSMENT OF ALTERNATIVES

The proposed application fails to adequately assess alternatives in accordance with the Environmental Impact Assessment requirements. It does not offer a structured comparison of realistic alternatives based on their environmental effects. Instead, it provides a narrative of project development that does not show that less harmful options have been properly identified or considered in favour of more damaging solutions.

There is a significant lack of transparent, evidence-based comparisons regarding alternative offshore locations, scales of development, or design configurations. Specifically, the application does not indicate that the developer has seriously evaluated the possibility of placing turbines further offshore, which could potentially lessen visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline and the critical role of proximity to shore in determining impact mean that this lack of analysis precludes any conclusion that the proposed site is the least damaging option.

The shortcomings also apply to cable routing and landfall assessments, as there is inadequate evidence that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors, such as Barvas Cemetery, which holds cultural and spiritual significance. The absence of a clear avoidance strategy, alongside the lack of comparative analysis, suggests that mitigation by design has not been adequately considered, with an overreliance on post-design mitigation measures instead.

Consequently, the application does not demonstrate that environmental harm has been minimised through site selection, layout, and infrastructure routing. This reflects a failure to adhere to the established mitigation hierarchy, leaving the competent authority unable to assess whether less harmful and more suitable alternatives are available. A thorough alternatives assessment is essential; without it, the sustainability and policy compliance of the proposal cannot be confirmed.

From a policy standpoint, this inadequacy compromises alignment with National Planning Framework 4, particularly regarding the protection of natural areas, cultural heritage, and community well-being. The absence of a systematic and comparative assessment represents a significant omission that supports the conclusion that the application has not been sufficiently evaluated and is unable to warrant a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species demonstrates significant deficiencies, failing to deliver a complete understanding of the ecological receptors in the West Lewis coastal environment. This area is a biologically active marine system, yet the baseline data provided is incomplete. Moreover, the methodologies employed do not adequately capture the presence, behaviour, and habitat use of various species, resulting in an assessment that lacks a solid evidential basis for evaluating potential impacts.

Notably, the application neglects to properly recognise and assess the active use of coastal areas by otters, a European Protected Species, for foraging and movement. The absence of consideration for their core foraging range and behavioural patterns leads to an inadequate assessment of the potential effects of construction disturbance, noise, and increased activity. Consequently, this undermines the conclusions drawn regarding the absence of significant effects on this species.

Additionally, the assessment of basking sharks is flawed due to a reliance on aerial surveys, which introduces substantial detection bias, particularly under Atlantic conditions. This method is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that indicate their frequent use of these waters. The failure to incorporate or properly consider such critical data results in an incomplete baseline and undermines the reliability of the conclusions presented.

These methodological shortcomings mean that conclusions regarding negligible or non-significant effects are based on assumptions rather than robust evidence. The lack of sufficient baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty casts doubt on 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 fails to properly identify or assess protected species. The uncertainty introduced precludes the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Given 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 obstruct a robust evaluation of impacts on marine ecology and protected species, leading to the overall conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application contains significant deficiencies that compromise its reliability, stemming from internal inconsistencies, methodological weaknesses, and a lack of sufficient evidence. Notably, the application does not meet the required evidential standard to demonstrate that internationally important seabird populations, particularly those associated with protected sites such as the Lewis Peatlands and St Kilda, will not be adversely affected. The assessment overlooks the importance of these feeding grounds and relies on modelling approaches that introduce uncertainty, especially for declining species like Kittiwakes and Fulmars. Furthermore, there is a fundamental contradiction in the developer's conclusions, as they assert no significant adverse effects while simultaneously presenting a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated.

The site for the development is situated within key foraging areas and migratory pathways, yet the assessment inadequately evaluates the implications of displacement, collision risk, and habitat loss. The placement of turbines within a recognised migratory corridor raises additional concerns, as it poses a significant risk by creating a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term consequences of potential sustained mortality in this corridor have not been adequately addressed, particularly for species with relatively small global populations.

From a regulatory standpoint, the application fails to satisfy the evidential threshold required to conclude that there will be no adverse effect on the integrity of protected sites. The combination of contradictory conclusions, data gaps, and limitations in the modelling process indicates that the necessary standard of beyond reasonable scientific doubt has not been met. This engages the precautionary principle and obstructs a lawful conclusion that would support consent.

Moreover, the identified deficiencies represent non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that important seabird populations will not face adverse effects places the proposal in direct conflict with national policy. Collectively, these factors culminate in a conclusion that the assessment is unreliable and that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline embodies a living cultural landscape, where community, environment, language, and tradition are interwoven. However, the assessment of cultural heritage and community identity is severely lacking. It approaches heritage as

isolated, unchanging assets, neglecting their dynamic social, cultural, and spiritual significance to the community.

Cemeteries at Dalmore, Bragar, and Barvas serve as vital places of burial and spiritual practice. Instead of acknowledging their ongoing use and importance, the assessment misclassifies them as static features, overlooking the impact that development could have on their surroundings. This incorrect interpretation leads to a partial understanding of cultural effects and dismisses their integral role in community life.

Moreover, the evaluation overlooks intangible cultural heritage, such as the Gaelic language and traditions that define the area's identity. These essential elements are conspicuously absent from the assessment, resulting in a critical oversight. Without addressing these factors, the true cultural implications of the development cannot be accurately gauged.

Community rights and engagement also raise concerns. The Gaelic-speaking population maintains a distinct cultural identity, characterised as an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of genuine engagement questions the assessment's validity and ignores established principles of participation regarding cultural and environmental issues.

Additionally, there is a notable procedural failure due to the absence of an Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. This missing evaluation prevents the competent authority from fulfilling its legal obligation to assess the social, cultural, and economic impacts on the island community, rendering the determination unlawful.

From a policy standpoint, these shortcomings directly contravene National Planning Framework 4, especially concerning the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage, alongside the failure to acknowledge living cultural practices, demonstrates a clear divergence from policy expectations.

Overall, the disregard for living heritage, intangible cultural values, community rights, and legal obligations culminates in a significant evidential gap. The cultural impacts of the proposed development remain inadequately assessed, leaving the application without a solid foundation for understanding the true cultural costs involved.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The evaluation of social impacts, health, and wellbeing associated with the proposed development is fundamentally inadequate and lacks the necessary transparency for a lawful appraisal. While the developer has commissioned a Social Impact Assessment

that included focus groups with local residents, the complete report has not been made available. This omission creates a significant evidential gap, hindering both public awareness and the competent authority's understanding of the social risks identified in the developer's own research.

Evidence suggests that residents are currently experiencing tangible stress, anxiety, and concern due to the scale and proximity of the proposal. These concerns arise from direct engagement with the community and are thus grounded in reality rather than speculation. However, the failure to release the full assessment limits proper scrutiny of these findings and restricts the ability to evaluate their significance in the decision-making process.

Furthermore, the proposal is perceived as a threat to community identity and cohesion, with "cultural loss" cited in the developer's own findings. Despite the acknowledgment of these impacts, they have not been adequately incorporated into the primary application nor afforded the necessary weight in the decision-making process. The lack of availability of the full Social Impact Assessment obscures the genuine human and social costs of the proposed development.

This deficiency in transparency undermines the Environmental Impact Assessment process, as a comprehensive understanding of the social, economic, and health implications is vital for developments of this nature, particularly in relation to community character and functionality. The absence of the complete dataset means that the application does not provide a thorough evidential basis for weighing benefits against potential harm.

From a policy standpoint, the application falls short of demonstrating compliance with National Planning Framework 4 regarding health and wellbeing. Developments are required to promote positive health outcomes and mitigate harm; however, the evidence at hand indicates existing adverse effects that remain undisclosed. Without access to the full assessment, it is impossible to verify compliance with this policy.

The procedural consequences are considerable. The competent authority is unable to conduct a comprehensive socio-economic and health evaluation without the complete Social Impact Assessment, marking a significant omission within the application and a failure to fulfill the evidential demands of the Environmental Impact Assessment regime.

In conclusion, the non-disclosure of the full Social Impact Assessment, in conjunction with documented evidence of current adverse impacts, renders the overall assessment

incomplete and unreliable. This situation precludes a lawful determination and underlines the assertion that the application is unsupported by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts and the relationship between landscape, seascape, and cultural heritage is fundamentally flawed, leading to an inadequate representation of the true scale of change and the sensitivity of the receiving environment. The West Lewis coastline is characterised by its open Atlantic horizon and a strong sense of remoteness, both of which would be severely compromised by the introduction of large-scale turbines near the shoreline. This would create a pervasive industrial presence that fundamentally alters the existing character of the landscape, resulting in a permanent transformation.

The application fails to capture the significant visual changes that would occur. The size and proximity of the turbines would dominate views from residential areas and historic sites, as well as from popular coastal locations. Such domination would have a direct negative effect on visual amenity and would erode the essential qualities of naturalness and remoteness. The assessment does not adequately communicate the severity of these impacts or their importance within the context of this sensitive landscape.

Concerns also arise regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that these viewpoints may not adequately reflect the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This suggests the potential for the visual impact to be understated, calling into question the assessment's overall reliability.

Another significant oversight is the lack of consideration for the interconnected nature of the landscape and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are integral to a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment erroneously treats these sites as isolated elements, failing to acknowledge their interdependence and resulting in a partial evaluation of the impacts on their settings and cultural significance.

The industrialisation of the seascape would disrupt these vital relationships, changing the context in which heritage assets are perceived and severing their connection to the natural horizon. This constitutes not only a visual impact but also a wider cultural and spatial harm that has not been sufficiently assessed in the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, particularly regarding the safeguarding of natural places and historic

assets. The extent of the proposed change is incompatible with the obligation 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, it is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and inescapable. This results in changes that are both fundamental and permanent, incapable of being reduced to an acceptable level through mitigation measures.

Collectively, these shortcomings in the assessment fail to reflect the true scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These deficiencies hinder a dependable evaluation and underscore the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The current proposal is deficient in its assessment of construction and pollution risks, lacking the necessary detail to adequately evaluate the likely environmental effects. Notably, the application involves significant seabed preparation and installation activities within a high-energy Atlantic environment, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are to be formulated post-consent, thereby hindering any meaningful assessment of their potential adequacy or effectiveness.

The reliance on undefined measures for future implementation is particularly troubling due to the sensitivity of the surrounding environment. The West Lewis coastline is characterised by clean coastal waters and vital habitats that are susceptible to disturbances from sediment and contamination. Although the application recognises risks such as sediment mobilisation and potential chemical or oil spills, it fails to provide sufficient detail regarding the preventative, control, or monitoring measures that would be employed.

Furthermore, there is significant uncertainty regarding the scale and behaviour of sediment plumes that may result from seabed disturbances and cable installations. The absence of robust modelling and clearly articulated management strategies makes it impossible to ascertain the extent, duration, or ecological consequences of these potential impacts. This uncertainty also applies to the possible effects on marine species and habitats that have already been identified as sensitive in the broader assessment context.

Additionally, the lack of detailed emergency response procedures exacerbates these issues. By postponing the establishment of contingency planning until after consent is granted, the application obstructs the evaluation of whether adequate safeguards are in place to respond to any pollution incidents. This introduces procedural risks and compromises the capacity 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 stipulations of the Environmental Impact Assessment regime. It is mandated that likely significant effects and mitigation measures be evaluated prior to granting consent, and the absence of such information impedes a lawful determination. Furthermore, the application does not demonstrate compliance with policy requirements pertaining to environmental protection and water quality.

In conclusion, the combination of undefined mitigation measures, the lack of detailed management plans, and the uncertainty regarding potential environmental impacts renders the assessment materially deficient. These shortcomings prevent a thorough evaluation of construction and pollution risks and strongly suggest that the application remains incomplete.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure linked to the offshore turbines is incomplete and does not fully capture the impacts of what is essentially a single integrated project. The offshore and onshore components are assessed independently, leading to a fragmented analysis that fails to reveal the true scale of the environmental and socio-economic consequences.

The onshore works involve cabling through protected moorland, the construction of a substation near Stornoway, and the development of access routes through sensitive landscapes. Notably, excavation is planned in areas of deep peat, particularly in Barvas Moor, which serves as a significant carbon store and is an ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, which limits understanding of the overall environmental footprint of the project.

By not fully considering onshore impacts, the application undermines the assessment of cumulative effects. The Environmental Impact Assessment process mandates that all project components be evaluated together; however, the separation of offshore and onshore elements obscures the combined effects on peatlands, habitats, and local communities.

Moreover, there are considerable risks posed to sensitive habitats, including machair systems and peatland environments that enjoy policy protection. The application does not convincingly demonstrate that impacts on these vital habitats have been comprehensively assessed or that appropriate avoidance measures are in place. This results in a significant gap concerning biodiversity protection.

Concerns also arise around carbon balance due to the disturbance of peatland, which could release stored carbon and potentially create a carbon debt that contradicts renewable energy development goals. The application fails to adequately tackle this critical issue or to show that the overall carbon balance remains favourable.

Furthermore, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application does not provide sufficient evidence that necessary consents or processes have been initiated, which brings into question the project's deliverability and lawful implementation.

From a policy standpoint, the inability to evaluate the project holistically and demonstrate the protection of peatlands, habitats, and land use interests contradicts the National Marine Plan and National Planning Framework 4. The lack of evidence that impacts can be avoided or mitigated further weakens the application.

In summary, the division of project components, the absence of comprehensive impact assessment, and the insufficient evidence regarding environmental and land use implications render this section of the application both incomplete and unreliable, hindering lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment fails to include any evaluation of dark skies and nocturnal wildlife, which represents a significant omission. The coastline of West Lewis is known for its exceptionally dark skies, an essential aspect of its environmental quality, cultural identity, and tourism potential. The proposed development introduces permanent red aviation lighting that is visible over extensive distances, resulting in a continuous and intrusive “wall of light” effect on the western horizon that would drastically change the night-time environment.

There is no consideration of how this lighting would impact visual amenity, landscape character, or the experiences of both residents and visitors. This lack of assessment is particularly concerning given the significance of dark skies to the area's identity and the emerging tourism sector focused on astro-tourism. The failure to address these factors highlights a clear gap in the overall landscape and environmental assessment.

Moreover, the application neglects to evaluate the impacts of this lighting on nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to their phototactic responses, which can result in disorientation and a higher risk of collisions. Without a dedicated lighting impact assessment or phototaxis study, the application does not assess how the proposed aviation lighting could affect these species or potentially increase their mortality rates.

This issue is exacerbated by the reliance on daytime survey data within the ornithological assessment, which fails to capture nocturnal activities and associated risks. Kittiwakes, for example, may forage or migrate at night and are susceptible to disorientation from artificial lighting; however, this risk has not been evaluated. The absence of site-specific night-time data creates a significant 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 may face adverse effects. The evidential standard necessary to eliminate adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and hindering lawful determination.

From a policy standpoint, this omission contravenes the National Planning Framework 4, which emphasises the protection of natural places and environmental quality. It also undermines the comprehensive evaluation of landscape and seascape impacts, as the night-time character is a vital component of the environment.

In summary, the absence of any assessment regarding dark skies and nocturnal wildlife represents 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 application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed and fails to meet the criteria for sustainable development as set out by statutory duties, national policy, and evidential standards. It mirrors the core issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. Despite being presented under a policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application does not offer a comprehensive or reliable evidential basis for assessment.

There are significant deficiencies in the baseline data, the use of an undefined design

envelope, and reliance on unspecified mitigation measures. Additionally, it omits crucial impact pathways concerning nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete and fails to provide a full understanding of the likely significant effects or residual impacts.

Procedural shortcomings are also evident. The lack of a compliant Island Communities Impact Assessment is a breach of the Islands (Scotland) Act 2018, and the failure to disclose the complete Social Impact Assessment is a material omission. These failures hinder the competent authority from properly assessing impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

In direct opposition to National Planning Framework 4, the proposal does not demonstrate adequate 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, as it does not include tourism impact modelling. Furthermore, the cumulative effects of offshore and onshore components have not been sufficiently evaluated, obscuring impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The evidential threshold necessary to demonstrate that adverse effects can be excluded beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and impeding 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, loss of dark skies, disruption of cultural and visual relationships, and adverse impacts on tourism would result in permanent effects that cannot be mitigated to an acceptable level.

In summary, the application is both procedurally and substantively unfit for determination. The breadth of information deficiencies, coupled with policy conflicts and unresolved environmental risks, prohibits a lawful and 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. Therefore, a formal request is made for the application for the Spiorad na Mara Offshore Wind Farm to be refused in its entirety.

Additional Comments

Please stop N4. It is far too big and far too close to the shore. It will destroy the unique scenery and nature. I would have to move away not only because I do not want to risk my health but also it would make me utterly sad to see the destroying of this peaceful environment.

So please stop N4.

Member of Public 266

Objection To Spiorad na Mara Offshore Wind Farm

References: MD-00011742 & MD-00011743

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The proposal raises significant concerns, particularly regarding its compatibility with statutory requirements, national policy, and sustainable development principles. It 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.

A critical issue with the application is its lack of an adequate evidential basis for lawful determination. The Environmental Impact Assessment Report and accompanying documents show that essential environmental data is missing, baseline information is limited and inconsistent, and important aspects of the proposal remain undefined. The flexible design framework employed prevents a clear understanding of the likely significant effects. Furthermore, the reliance on unspecified mitigation measures means that their effectiveness cannot be properly assessed. Consequently, the documentation does not allow for a full understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust evidence.

There are substantial policy conflicts evident in the application. 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 proposal fails to demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. These conflicts directly undermine the statutory tests necessary for consent and jeopardise the ability of the competent authority to deem the development acceptable in policy terms.

The unprecedented scale of the proposal introduces additional concerns, with large turbines positioned close to the shoreline raising issues related to landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear non-compliance with policy guidelines demonstrates that the application is incomplete and cannot support a lawful determination. Under these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report demonstrates substantial deficiencies, failing to deliver a comprehensive, transparent, and trustworthy evaluation of the anticipated environmental impacts associated with the proposal. Notably, the absence of specific turbine dimensions, layouts, or configurations due to the reliance on a

flexible Project Design Envelope creates considerable uncertainty. This lack of clarity undermines the assessment's integrity, leading to the potential that the impacts delineated may not accurately mirror the eventual development, thus obstructing both public and competent authority comprehension of the true nature of environmental effects.

Consent for the application is predicated on the assumption that environmental harm will be addressed through unspecified mitigation measures, monitoring strategies, and management plans, which remain undefined. This approach defers critical information to stages following consent, rendering it impossible to evaluate the effectiveness or assess residual impacts meaningfully. Such deferral contravenes the Environmental Impact Assessment framework's intent, which mandates that significant effects and mitigation be clearly established prior to determination.

The report further reveals considerable evidential shortcomings, including notable gaps in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. Consequently, this engenders uncertainty concerning the magnitude and significance of impacts, especially in instances where findings of negligible or non-significant effects are presented without adequate supporting data. This insufficiency obstructs a thorough understanding of cumulative and worst-case impacts, while introducing scientific uncertainties that stand in conflict with statutory obligations.

As a direct result of these inadequacies, the application fails to satisfy the evidential standard stipulated under the Habitats Regulations, which demands the exclusion of adverse effects beyond reasonable scientific doubt. The precautionary principle is thus invoked, particularly regarding protected species and sensitive habitats. Moreover, the proposal does not demonstrate adherence to National Planning Framework 4, particularly in terms of biodiversity protection and environmental integrity, as it cannot substantiate that impacts have been comprehensively assessed or that appropriate safeguards exist.

Collectively, the reliance on an undefined design envelope, the absence of specific mitigation measures, and the gaps in baseline data culminate in an unreliable and incomplete Environmental Impact Assessment Report. These deficiencies preclude a lawful and rigorous appraisal of environmental effects, thereby placing the competent authority in a position where it cannot make an informed decision based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is inadequate and does not furnish a comprehensive or dependable understanding of the ecological receptors present in the West Lewis coastal environment. This area is characterised as a highly sensitive and biologically rich marine system, yet the baseline data provided is insufficient and the methodologies utilised do not effectively capture the presence, behaviour, and habitat usage of various species. Consequently, the assessment falls short of providing a solid evidential foundation for evaluating the impacts of the proposed developments.

A significant oversight involves otters, which are classified as a European Protected Species. The application inadequately acknowledges and evaluates the active utilisation of coastal areas by otters for foraging and movement. Without a proper assessment of their core foraging ranges and behavioural patterns, the potential consequences of construction disturbances, noise, and increased activity have not been thoroughly examined. This lack of consideration undermines any conclusions drawn regarding the absence of significant effects on this species.

Furthermore, the assessment of basking sharks is compromised by the reliance on aerial surveys, which introduce considerable detection bias, particularly under Atlantic conditions. This methodology is likely to lead to an underestimation of their presence, especially when compared to established land-based observations that indicate frequent utilisation of these waters. By failing to incorporate or adequately evaluate such data, the assessment produces an incomplete baseline, which diminishes the reliability of its conclusions.

The methodological shortcomings result in conclusions about negligible or non-significant effects being based more on assumptions than on solid evidence. The lack of sufficient baseline data also hampers any meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates significant uncertainty regarding the actual scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it has not accurately identified or assessed protected species. The level of uncertainty introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these conditions, it is clear that consent cannot be lawfully granted.

In summary, the combination of insufficient baseline data, flawed methodologies, and unsupported conclusions collectively undermines the reliability of the assessment.

These deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species, leading to the overarching conclusion that the application lacks an adequate evidential basis.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is not merely a geographical area; it embodies a living cultural landscape where environment, language, tradition, and community interlink deeply. The assessment of cultural heritage and community identity is fundamentally inadequate, treating heritage as a series of isolated, static assets instead of recognising their ongoing social, cultural, and spiritual roles within the community. This reductive approach fails to acknowledge the integral nature of these cultural elements.

A significant shortcoming is evident in the treatment of important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet the assessment incorrectly categorises them as static features. This oversight neglects their continuous use and meaning, resulting in an incomplete understanding of the cultural effects and disregarding their significance within community life.

The application also neglects to assess intangible cultural heritage, including the Gaelic language and traditions that form the foundation of community identity in the area. This omission is notable as these elements are vital to understanding the cultural impact of the development. Without their inclusion, the assessment remains deficient and fails to capture the true cultural cost of the proposed development.

Additionally, there are critical concerns regarding community rights and engagement. The Gaelic-speaking population, recognised as having the characteristics of 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 does not adhere to established principles of participation concerning cultural and environmental interests.

Moreover, a significant procedural failure exists due to the absence of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. This omission prevents the competent authority from fulfilling its legal duty to evaluate the social, cultural, and economic impacts on the island community, rendering a lawful determination impossible.

From a policy perspective, these deficiencies place the proposal at odds with the National Planning Framework 4, particularly regarding the protection of historic assets and places. The failure to consider both tangible and intangible heritage, along with a

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

In summary, the lack of assessment concerning living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development remain inadequately assessed, and the application fails to provide a sufficient basis for evaluating the genuine cultural implications of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The evaluation of social impacts, health, and wellbeing associated with the proposed development is fundamentally inadequate and lacks the necessary transparency for a lawful appraisal. While the developer has commissioned a Social Impact Assessment that included focus groups with local residents, the complete report has not been made available. This omission creates a significant evidential gap, hindering both public awareness and the competent authority's understanding of the social risks identified in the developer's own research.

Evidence suggests that residents are currently experiencing tangible stress, anxiety, and concern due to the scale and proximity of the proposal. These concerns arise from direct engagement with the community and are thus grounded in reality rather than speculation. However, the failure to release the full assessment limits proper scrutiny of these findings and restricts the ability to evaluate their significance in the decision-making process.

Furthermore, the proposal is perceived as a threat to community identity and cohesion, with "cultural loss" cited in the developer's own findings. Despite the acknowledgment of these impacts, they have not been adequately incorporated into the primary application nor afforded the necessary weight in the decision-making process. The lack of availability of the full Social Impact Assessment obscures the genuine human and social costs of the proposed development.

This deficiency in transparency undermines the Environmental Impact Assessment process, as a comprehensive understanding of the social, economic, and health implications is vital for developments of this nature, particularly in relation to community character and functionality. The absence of the complete dataset means that the application does not provide a thorough evidential basis for weighing benefits against potential harm.

From a policy standpoint, the application falls short of demonstrating compliance with National Planning Framework 4 regarding health and wellbeing. Developments are

required to promote positive health outcomes and mitigate harm; however, the evidence at hand indicates existing adverse effects that remain undisclosed. Without access to the full assessment, it is impossible to verify compliance with this policy.

The procedural consequences are considerable. The competent authority is unable to conduct a comprehensive socio-economic and health evaluation without the complete Social Impact Assessment, marking a significant omission within the application and a failure to fulfill the evidential demands of the Environmental Impact Assessment regime.

In conclusion, the non-disclosure of the full Social Impact Assessment, in conjunction with documented evidence of current adverse impacts, renders the overall assessment incomplete and unreliable. This situation precludes a lawful determination and underlines the assertion that the application is unsupported by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts and the relationship between landscape, seascape, and cultural heritage is fundamentally flawed, leading to an inadequate representation of the true scale of change and the sensitivity of the receiving environment. The West Lewis coastline is characterised by its open Atlantic horizon and a strong sense of remoteness, both of which would be severely compromised by the introduction of large-scale turbines near the shoreline. This would create a pervasive industrial presence that fundamentally alters the existing character of the landscape, resulting in a permanent transformation.

The application fails to capture the significant visual changes that would occur. The size and proximity of the turbines would dominate views from residential areas and historic sites, as well as from popular coastal locations. Such domination would have a direct negative effect on visual amenity and would erode the essential qualities of naturalness and remoteness. The assessment does not adequately communicate the severity of these impacts or their importance within the context of this sensitive landscape.

Concerns also arise regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that these viewpoints may not adequately reflect the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This suggests the potential for the visual impact to be understated, calling into question the assessment's overall reliability.

Another significant oversight is the lack of consideration for the interconnected nature of the landscape and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are integral to a broader landscape context

that is visually and spatially linked to the Atlantic horizon. The assessment erroneously treats these sites as isolated elements, failing to acknowledge their interdependence and resulting in a partial evaluation of the impacts on their settings and cultural significance.

The industrialisation of the seascape would disrupt these vital relationships, changing the context in which heritage assets are perceived and severing their connection to the natural horizon. This constitutes not only a visual impact but also a wider cultural and spatial harm that has not been sufficiently assessed in the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, particularly regarding the safeguarding of natural places and historic assets. The extent of the proposed change is incompatible with the obligation 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, it is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and inescapable. This results in changes that are both fundamental and permanent, incapable of being reduced to an acceptable level through mitigation measures.

Collectively, these shortcomings in the assessment fail to reflect the true scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These deficiencies hinder a dependable evaluation and underscore 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 lacks the necessary detail to evaluate likely environmental effects adequately. Notably, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans presented. Instead, the application relies on mitigation and contingency measures that are to be developed post-consent, hindering 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 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 fails to provide adequate detail on the strategies for prevention, control, or monitoring of these risks.

Additionally, there is uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it becomes impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also applies to the potential effects on marine species and habitats, which have already been identified as sensitive within the broader assessment.

Moreover, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application restricts the evaluation of whether adequate safeguards exist to address pollution events. This not only introduces procedural risk but also undermines the ability of the competent authority to assess environmental protection measures at the determination stage.

From a regulatory standpoint, deferring essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation strategies are assessed prior to consent, and the absence of such information precludes a lawful determination. 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 regarding potential impacts result in a materially deficient assessment. These shortcomings impede a thorough evaluation of construction and pollution risks, reinforcing the conclusion 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 when evaluated against statutory obligations, national policies, and evidential standards. The application revisits core issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This new proposal is being considered under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant deficiencies in the evidential basis provided for the determination of this application. Critical gaps in baseline data exist, alongside the continued use of an undefined design envelope, reliance on unspecified mitigation measures, and the

exclusion of essential impact pathways, including effects on nocturnal wildlife, comprehensive onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, preventing a thorough understanding of the likely significant effects or any residual impacts.

Furthermore, procedural shortcomings are evident. The lack of a compliant Island Communities Impact Assessment breaches statutory duties outlined in the Islands (Scotland) Act 2018, and the failure to present a complete Social Impact Assessment constitutes a significant omission. Such deficiencies 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 contradicts the National Planning Framework 4 by failing to demonstrate the protection of biodiversity, natural spaces, and cultural heritage. It does not adequately address health and wellbeing impacts and lacks evidence of a net economic benefit, primarily due to the absence of tourism impact modelling. Additionally, the cumulative effects of both offshore and onshore components have not been appropriately assessed, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertain and potentially significant environmental risks persist, as assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt remains unmet, invoking the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

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, the disruption of cultural and visual connections, and the effects on tourism represent permanent alterations that cannot be mitigated effectively.

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

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

Additional Comments

Dear Sir/Madam

I am writing to you not just as a resident, but as a custodian of a coastline that has shaped my family for generations.

The sea off the West Coast, Isle of Lewis is more than a resource; it's the rhythm of our lives and the very Soul of our community.

The proposed N4 project feels less like progress and more like a scar on a sacred horizon. To place industrial turbines in these waters is to silence the wildness that draws us home and sustains our Spirit.

I ask you to look beyond the blueprints and see the living heritage you are being asked to overlook.

Please do not let our children be the first generation to know a horizon defined by steel rather than our Sea and all the mammals within.

I implore you to protect this sanctuary and tell Northland and ESB to seek a path for energy that does not cost us our identity.

Member of Public 267

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 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.

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 268

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.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposal under consideration lacks a comprehensive assessment of marine ecology and protected species, which is essential for understanding the ecological receptors within the West Lewis coastal environment. This region is recognised as a highly sensitive and biologically active marine system. However, the data available is incomplete, and the methodologies employed do not adequately capture the presence, behaviour, or habitat use of various species. Consequently, the assessment does not provide a reliable evidential basis for evaluating potential impacts.

Notably, the assessment fails to properly identify and assess otters, which are a European Protected Species. There is insufficient recognition of their active use of coastal areas for foraging and movement, and the core foraging range and behavioural patterns of otters have not been adequately considered. This lack of detail means that the potential impacts of construction disturbance, noise, and increased activity on otters have not been thoroughly assessed, undermining any conclusions about the absence of significant effects on this species.

Additionally, there are substantial deficiencies in the assessment of basking sharks, as the reliance on aerial surveys introduces considerable detection bias, particularly in Atlantic conditions. This methodology is likely to lead to an underestimation of their presence, especially when compared to established land-based observations that indicate frequent use of these waters. The failure to incorporate or adequately consider such relevant data results in an incomplete baseline and weakens the reliability of the conclusions drawn.

The methodological limitations present mean that conclusions suggesting negligible or non-significant effects are based more on assumptions than on solid evidence. The lack of adequate baseline data also hampers the ability to conduct meaningful assessments of cumulative and indirect impacts, including seasonal variations and interactions within the wider ecosystem. This situation creates uncertainty about the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime and the National Planning Framework 4, as there has been a failure to properly identify or assess protected species. The uncertainty introduced by these deficiencies prevents the conclusion that adverse effects can be excluded beyond reasonable scientific doubt, thus engaging the precautionary principle. In light of these circumstances, consent cannot be lawfully granted.

In summary, the assessment is rendered unreliable due to the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions. These deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species, leading to the overall determination that the application lacks a sufficient evidential foundation.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity in the application is fundamentally flawed, neglecting to recognise the West Lewis coastline as a dynamic cultural landscape where the environment, language, tradition, and community are interwoven. Instead, the assessment adopts a simplistic perspective, viewing heritage merely as isolated, static features, thus failing to account for their ongoing social, cultural, and spiritual relevance within the community.

A significant oversight pertains to 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 the assessment categorises them as mere static features, overlooking their continual use, significance, and the development's impact on their surroundings. Such mischaracterisation leads to an inadequate evaluation of cultural effects and ignores their importance to community life.

Moreover, the application does not address intangible cultural heritage, which encompasses the Gaelic language, traditions, and the longstanding connection between the community and the coastal environment. These aspects are crucial to the area's identity but are notably absent from the assessment, marking a substantial

omission. Without acknowledging these elements, the cultural implications of the development cannot be fully comprehended.

Concerns extend to community rights and engagement as well. The Gaelic-speaking population embodies a distinct cultural identity recognised as that of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. The lack of meaningful engagement diminishes the legitimacy of the assessment and fails to uphold established principles regarding participation in matters impacting cultural and environmental interests.

Another critical shortcoming is the absence of a compliant Island Communities Impact Assessment, a 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 hinders a lawful determination.

From a policy standpoint, these shortcomings place the proposal in direct opposition to the National Planning Framework 4, especially concerning the protection of historic assets and places. The failure to consider both tangible and intangible heritage, as well as living cultural practices, signifies a clear deviation from policy standards.

In summary, the inadequacies in assessing living heritage, intangible cultural value, community rights, and statutory responsibilities create a substantial evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application does not offer a sound foundation for assessing the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The application presents significant procedural implications due to the non-disclosure of the complete Social Impact Assessment. This omission prevents the competent authority from conducting a thorough socio-economic and health evaluation, which is essential for compliance with the evidential requirements of the Environmental Impact Assessment regime.

Furthermore, the assessment of health, social impacts, and wellbeing is significantly deficient, lacking the necessary transparency for a lawful evaluation. Although the developer engaged local residents through focus groups as part of the Social Impact Assessment, the full report remains unpublished. This represents a critical evidential gap, obstructing both public understanding and the competent authority's grasp of the social risks identified by the developer's own research.

Available summaries reveal that residents are already experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement with the community and are thus not speculative. Nevertheless, the absence of the full assessment limits the potential for proper scrutiny of these findings, making it challenging to ascertain their significance in the decision-making process.

Moreover, there is evidence indicating that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite this, the application has not fully integrated these impacts or afforded them appropriate weight, thereby obscuring the true human and social costs associated with the development.

The lack of transparency in disclosing the full dataset undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health impacts is paramount for developments of this magnitude, particularly when community character and functioning may be at stake.

From a policy perspective, the application fails to demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. While development should promote positive health outcomes and avoid harm, available evidence indicates pre-existing adverse effects that remain undisclosed. Therefore, without the complete assessment, adherence to this policy cannot be adequately evidenced.

Taken together, the non-disclosure of the complete Social Impact Assessment, alongside existing evidence of adverse impacts, renders the assessment incomplete and unreliable. This situation precludes a lawful determination and reinforces the assertion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, seascape, and landscape associated with the proposal is insufficient and does not capture the extent of change or the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by an open Atlantic horizon, an undeveloped landscape, and a strong sense of remoteness. The proposed large-scale turbines, positioned near the shoreline, would create a continuous industrial presence that would significantly alter this character, leading to a permanent and irreversible transformation of the landscape.

Furthermore, the application inadequately represents the magnitude of the anticipated visual change. The size and proximity of the turbines are such that they would dominate views from residential areas, historic sites, and popular coastal locations. This would

have a direct effect on visual amenity and undermine the landscape's defining qualities of naturalness and remoteness. The assessment fails to adequately articulate the level of impact or its significance within the context of this sensitive landscape.

There are also critical methodological issues regarding how visual viewpoints have been selected and presented. It appears that these viewpoints may not fully represent the most sensitive receptors or worst-case scenarios, especially concerning significant cultural heritage sites and valuable landscapes. This raises concerns that the actual visual impact has been underestimated, thereby compromising the assessment's reliability.

Additionally, there is a significant oversight in failing to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these sites as isolated entities, neglecting their interdependence, which results in an incomplete evaluation of impacts on their cultural significance and setting.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and severing their connection to the natural horizon. This denotes not just a visual impact but a more extensive cultural and spatial damage that has not been sufficiently assessed within the proposal.

From a policy standpoint, the application contravenes National Planning Framework 4 concerning the safeguarding of natural spaces and historic assets. The extent of change proposed is at odds with the need to protect landscape character, visual amenity, and the settings of culturally significant locations. The lack of a thorough worst-case impact assessment further weakens any assertions of policy adherence.

Moreover, the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would ensure their presence remains dominant and unavoidable. Consequently, the resultant changes are fundamental and permanent, and cannot be reduced to an acceptable level through mitigation measures.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The evaluation of the onshore infrastructure associated with this project is fundamentally flawed and fails to capture the full range of impacts from what constitutes a single, integrated initiative. The offshore turbines are closely linked to the onshore works, yet these elements are assessed in isolation. This disjointed analysis obscures the true scale of environmental and socio-economic consequences.

Key onshore components include the installation of cabling across protected moorland, the construction of a substation in proximity to Stornoway, and the creation of access routes through sensitive landscapes. Significant excavation across deep peat areas, especially within Barvas Moor, which serves as an important carbon store and ecologically fragile habitat, is also part of these works. The lack of a thorough assessment of these impacts hinders a comprehensive understanding of the project's overall environmental footprint.

The omission of onshore impact assessments prevents an accurate evaluation of cumulative effects. According to the Environmental Impact Assessment process, all elements of a project should be examined collectively. However, the distinct separation of offshore and onshore aspects leads to a lack of clarity regarding the combined effects on peatlands, habitats, and local communities.

Moreover, there are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are safeguarded by policy. The proposal does not sufficiently demonstrate that impacts on these habitats have been thoroughly evaluated or that suitable avoidance strategies have been implemented, resulting in a clear evidential void concerning biodiversity protection.

Additionally, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application fails to provide proof that the requisite consents or processes are underway, which calls into question the feasibility and lawful execution of the project.

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

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

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm fails to meet the requirements of sustainable development as outlined by statutory duties, national policy, and evidential standards. This proposal echoes the central issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. It is now put forward under a policy framework that places heightened emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

The evidential basis provided in the application is both incomplete and unreliable. There are significant gaps in baseline data, the design envelope remains undefined, and there is a reliance on unspecified mitigation measures. Furthermore, important impact pathways are omitted, such as those affecting nocturnal wildlife, the full extent of onshore infrastructure, and the implications for tourism. As a result, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of likely significant effects or residual impacts.

Procedural failings are also evident. The lack of a compliant Island Communities Impact Assessment represents a breach of statutory duty under the Islands (Scotland) Act 2018, while the failure to provide a full Social Impact Assessment constitutes a notable omission. These shortcomings impede the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

In addition, the proposal contradicts the principles laid out in National Planning Framework 4. It does not sufficiently demonstrate the protection of biodiversity, natural spaces, and cultural heritage, fails to show that health and wellbeing impacts are acceptable, and cannot evidence a net economic benefit due to the lack of tourism impact modelling. The cumulative impact of both offshore and onshore elements has not been adequately assessed, masking effects on peatlands, carbon balance, habitats, and crofting land.

The environmental risks associated with the proposal remain uncertain and potentially significant. The assessments regarding marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also inconsistently documented. The requisite evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been achieved, which engages the precautionary principle and prevents a lawful conclusion that the impacts are acceptable.

Furthermore, 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, disruption of cultural and visual relationships, and negative impacts on tourism represent enduring effects that cannot be mitigated to an acceptable level.

Taken as a whole, the application is procedurally and substantively inadequate for determination. The numerous information deficiencies, coupled with policy conflicts and unresolved environmental risks, hinder a lawful and evidence-based decision. The competent authority should refuse consent on these grounds or utilise the relevant regulatory provisions to mandate the submission of the missing information.

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

Additional Comments

The long and short term effects of a wind farm on this scale are beyond imagination. The Hebrides are fragile, our young leave and there are little prospect for those who live here long term. Much work will be provided for those who are being housed to come in and build them. This is of grave concern, given we are already seeing the effects of current workers in our town (targeting women and drunk outside of work hours) with little to no accountability. It makes future prospects for locals appear very bleak indeed.

Member of Public 269

Objection To Spiorad na Mara Offshore Wind Farm

References: MD-00011742 & MD-00011743

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a review of the Environmental Impact Assessment Report and supporting documents. It highlights deficiencies in planning, environmental considerations, cultural aspects, and procedural matters. The development is situated off the west side of the Isle of Lewis, an area notable for its Atlantic-facing coastline, nearly pristine environment, and strong cultural identity. The proposal's scale, proximity, and design 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 lawful determination. Missing critical environmental data, limited and inconsistent baseline information, and undefined key aspects of the proposal all contribute to this inadequacy. The use of a flexible design framework obscures a clear understanding of the likely significant effects, and the reliance on unspecified mitigation measures prevents assessment of their effectiveness. Consequently, the documentation does not facilitate a complete or informed understanding of the environmental, cultural, or community impacts. The claims of negligible or non-significant effects are not backed by robust evidence.

There are significant conflicts with established policy. The proposal does not appear to align with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural spaces, cultural heritage, and health and wellbeing. It fails to demonstrate that it can meet national requirements to protect biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests needed for consent and impair the competent authority's ability to determine that the development is policy-compliant.

The scale of the proposal is unprecedented for this area, with large turbines sited in close proximity to the shoreline, raising significant concerns about landscape capacity, visual impact, and environmental repercussions. The combination of insufficient information, reliance on undefined mitigation measures, evidential weaknesses, and clear non-compliance with policy demonstrates that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The deficiencies within the Environmental Impact Assessment Report are significant, rendering it unreliable and incomplete. Notably, the assessment relies on a flexible Project Design Envelope, which lacks definitive turbine dimensions, layouts, or configurations. This ambiguity introduces considerable uncertainty and hinders a consistent application of a worst-case scenario. Consequently, the impacts reported may not accurately represent the development that will ultimately be constructed, leading to a failure in understanding the true environmental effects for both the public and the competent authority.

Additionally, the application heavily depends on mitigation measures, monitoring strategies, and management plans that are yet to be clearly defined. This approach seeks consent under the premise that environmental harm will be addressed post-consent, which obstructs any meaningful evaluation of effectiveness and the assessment of residual impacts. The postponement of vital information to later stages is procedurally unacceptable and contravenes the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly outlined prior to determination.

Moreover, the report exhibits critical evidential deficiencies, including substantial gaps in baseline data and limitations in methodology, relying excessively on assumptions rather than site-specific evidence. This leads to uncertainty concerning the scale and significance of impacts, particularly where conclusions of negligible or non-significant effects are put forth without sufficient supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, resulting in scientific uncertainty that cannot align with statutory requirements.

Furthermore, the proposal does not meet the evidential threshold outlined under the Habitats Regulations, failing to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. It also does not demonstrate compliance with National Planning Framework 4, as it cannot be shown that impacts have been thoroughly assessed or that appropriate safeguards exist.

In conclusion, the combination of an undefined design envelope, unspecified mitigation strategies, and significant gaps in baseline data culminates in an Environmental Impact Assessment Report that lacks reliability and completeness. These inadequacies obstruct a lawful and robust assessment of environmental effects, leaving the competent authority unable to make an informed determination based on the information presented.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species within the West Lewis coastal environment is fundamentally inadequate, lacking a thorough and dependable understanding of the ecological receptors present in this sensitive marine area. The baseline data is insufficient, and the methodologies employed do not effectively capture the presence, behaviours, and habitat utilisation of various species. Consequently, the assessment fails to establish a credible evidential basis for understanding potential impacts.

Particularly concerning is the oversight regarding otters, classified as a European Protected Species. The application does not appropriately acknowledge or assess their active usage of coastal regions for foraging and movement. This oversight neglects critical factors such as their core foraging range and behavioural patterns, leading to an inadequate assessment of the potential impacts stemming from construction activities, noise, and increased human activity. Such gaps significantly undermine any assertions regarding the lack of significant effects on this species.

Additionally, the assessment of basking sharks suffers from deficiencies, primarily due to an over-reliance on aerial surveys that introduce substantial detection bias, especially under Atlantic conditions. This methodological approach is likely to underreport the presence of these sharks, particularly when compared to established land-based observations that indicate their frequent utilisation of these waters. The failure to integrate or properly consider such data culminates in an incomplete baseline, thus diminishing the reliability of the conclusions drawn.

These methodological shortcomings result in findings of negligible or non-significant effects being based on conjectures instead of robust evidence. The lack of adequate baseline data hinders a meaningful assessment of cumulative and indirect impacts, encompassing seasonal variations and broader ecosystem interactions. This uncertainty raises questions about the genuine level of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the stipulations of the Environmental Impact Assessment framework and National Planning Framework 4, given that protected species have not been sufficiently identified or evaluated. The uncertainty generated prevents the exclusion of adverse effects beyond reasonable scientific doubt, necessitating the application of the precautionary principle. Under these circumstances, lawful consent cannot be granted.

In summary, the combination of insufficient baseline data, flawed methodologies, and unsupported conclusions renders the assessment untrustworthy. These inadequacies obstruct a thorough evaluation of the potential impacts on marine ecology and

protected species, leading to the overarching conclusion that the application is devoid of 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. However, the ornithological assessment associated with the development fails to convincingly demonstrate that these species will not be adversely affected, despite the crucial location within key foraging areas and migratory pathways. It does not adequately evaluate the implications of potential displacement, collision risk, or habitat loss, resulting in significant gaps in evidence and internal inconsistencies that undermine its conclusions.

A critical contradiction exists within the application, as the developer concludes that there will be no significant adverse effects while also advancing a Habitats Regulations derogation case. This case is only necessary when significant harm is expected, which raises doubts about the reliability of the assessment and indicates that the conclusions reached are not substantiated by the evidence provided. Furthermore, the assessment lacks sufficient evidence to assure that seabirds associated with 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 introduces uncertainty, particularly for species like Kittiwakes and Fulmars, which are experiencing severe declines. The methodologies employed are likely to underestimate mortality, especially where baseline data is lacking and the behavioural responses of the birds are not fully understood.

The siting of turbines within a recognised migratory corridor poses an additional and significant risk, creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor are not adequately assessed, nor are the potential effects on species with small global populations considered.

From a regulatory standpoint, the application does not meet the evidential threshold required to conclude no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, combined with data gaps and limitations in the modelling approach, means that the standard of beyond reasonable scientific doubt has not been achieved. This situation engages the precautionary principle and prevents 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.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is fundamentally flawed. It fails to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are interconnected. Instead, the application adopts a simplistic view, treating heritage as isolated, static assets while neglecting their ongoing social, cultural, and spiritual roles within the community.

Particularly concerning is the inadequate treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice; however, they have been categorised as static features in the assessment. This oversight disregards their continued significance, use, and the development's potential impact on their setting, leading to an incomplete evaluation of cultural effects and a failure to acknowledge their importance to community life.

Furthermore, the application does not take into account intangible cultural heritage aspects, such as the Gaelic language, local traditions, and the longstanding relationship between the community and the coastal environment. These factors are integral to the area's identity and their absence from the assessment represents a major shortcoming. The lack of consideration for these elements prevents a proper understanding of the cultural impact of the proposed development.

There are additional concerns regarding community rights and engagement. The Gaelic-speaking population possesses a distinct cultural identity recognised as characteristic of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This failure to engage meaningfully undermines the legitimacy of the assessment and does not reflect established principles of participation in decisions affecting cultural and environmental interests.

A critical procedural oversight is the absence of a compliant Island Communities Impact Assessment, required under the Islands (Scotland) Act 2018. This omission hinders the competent authority's ability to fulfil its legal duty to evaluate the social, cultural, and economic impacts on the island community, thereby preventing a lawful determination.

From a policy standpoint, these deficiencies conflict with National Planning Framework 4, particularly regarding the protection of historic assets and places. The failure to consider both tangible and intangible heritage, along with the disregard for living cultural practices, clearly departs from policy requirements.

In summary, the lack of assessment of living heritage, intangible cultural value, community rights, and adherence to statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application does not offer a sufficient basis to assess the true cultural cost of the proposal.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the standards of sustainable development in relation to statutory duties, national policy, and evidential requirements. This proposal echoes the fundamental concerns that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. It is now presented with a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing more strongly than before.

There are major deficiencies in the evidential basis necessary for determination. Critical gaps in baseline data exist, alongside the continued use of an undefined design envelope, and reliance on unspecified mitigation measures. Additionally, key impact pathways, such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism, are omitted. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of potential significant effects or residual impacts.

The application also exhibits clear procedural deficiencies. A compliant Island Communities Impact Assessment is lacking, which breaches the statutory obligations set forth in the Islands (Scotland) Act 2018. Furthermore, the non-disclosure of a complete Social Impact Assessment is a material omission. Such failings inhibit the competent authority from adequately assessing impacts on community wellbeing, cultural identity, and economic resilience, making the application unsuitable for determination.

In terms of policy compliance, the proposal contradicts National Planning Framework 4. It does not adequately protect biodiversity, natural spaces, and cultural heritage. Health and wellbeing impacts are not demonstrated as acceptable, and there is no evidence of a net economic benefit due to the lack of tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore elements is insufficient, leading to

obscured effects on 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 not only incomplete but, in some areas, inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and rendering a lawful conclusion regarding the acceptability of impacts impossible.

Furthermore, the proposal would lead to substantial and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruptions to cultural and visual relationships, and negative impacts on tourism would result in permanent effects that cannot be adequately mitigated.

When considered as a whole, the application is both procedurally and substantively unfit for determination. The extent of information gaps, alongside policy conflicts and unresolved environmental risks, precludes a lawful, evidence-based decision. The competent authority must either refuse consent on these grounds or utilise the relevant regulatory provisions to require the submission of the necessary missing information.

Therefore, it is formally requested that the application for the Spiorad na Mara Offshore Wind Farm is refused in its entirety.

Member of Public 270

Dear Marine Directorate Licensing Operations Team,

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 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.

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:

The application represents a deficient EIAR because it contains significant gaps in baseline data regarding local species. (National Marine Plan; NPF4 Policy 1)

The developer’s own Habitats Appraisal Derogation Case proves that the project cannot be completed without damaging protected nature sites. (Habitats Regulations; NPF4 Policy 3)

The proposal fails the Precautionary Principle, as there is no evidence beyond reasonable scientific doubt that local bird populations will survive. (National Marine Plan Policy GEN 9)

I object on the grounds that the project poses an unacceptable risk to SPA-integrity (Special Protection Areas). (NPF4 Policy 4; Birds Directive)

The project fails the NPF4 Policy 3 mandate, which requires a measurable net gain for biodiversity, not just mitigation. (NPF4 Policy 3)

The proposal offers no genuine biodiversity enhancement and fails to contribute to our local Nature Network. (NPF4 Policy 3(a))

Failure to provide detailed CEMPs or Pollution Prevention Plans prevents a robust assessment.

An Appropriate Assessment cannot conclude 'no adverse effect' given that high-energy piling will disturb 28% of the local bottlenose dolphin population." (NPF4 Policy 4; Habitats Regulations)

The developer has failed to establish a proper nocturnal baseline, ignoring the lethal risk to nocturnal species. (NPF4 Policy 3; Marine Policy Statement).

The impact of phototaxis (fatal attraction to aviation lighting) on migrating birds has been dangerously underestimated. (NPF4 Policy 4)

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 271

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 objection arises from a thorough examination of the Environmental Impact Assessment Report and accompanying documents, highlighting significant planning, environmental, cultural, and procedural deficiencies. The proposed site is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and a strong cultural identity. Concerns regarding the scale, proximity, and design of the project raise fundamental questions about its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application does not establish a sufficient evidential basis for a lawful determination. There is a lack of critical environmental data, with baseline information being limited and inconsistent. Many key aspects of the proposal remain undefined. The employment of a flexible design framework obscures the understanding of potentially significant effects, while the reliance on unspecified mitigation measures renders their effectiveness impossible to evaluate. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, with claims of negligible or non-significant effects lacking robust evidence.

There are evident and substantial conflicts with policy. The proposal does not align with

the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. These conflicts directly impact the statutory tests required for consent, compromising the capacity of the competent authority to determine the proposal's acceptability in policy terms.

The unprecedented scale of the project, with large turbines positioned near the shoreline, generates serious concerns regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance illustrates that the application is incomplete and unable to support a lawful determination. In light of these issues, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed, lacking a comprehensive, transparent, and dependable account of the probable environmental consequences of the proposed project. The report's reliance on a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, introduces significant uncertainty. This lack of clarity hampers the ability to consistently apply a worst-case scenario, undermining the assessment's integrity and resulting in the potential for the impacts described not to align with the development ultimately executed. This deficiency hampers both public understanding and that of the competent authority regarding the true extent of the environmental effects.

Moreover, the application leans heavily on unspecified mitigation measures, monitoring strategies, and management plans, which remain undeveloped at this stage. Seeking consent under these conditions means that environmental harm will ostensibly be addressed later, thereby obstructing any meaningful evaluation of the effectiveness of these measures or the assessment of residual impacts. Such deferral of critical information to post-consent phases is procedurally improper, contravening the intent of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation measures be clearly defined prior to determination.

Additionally, significant evidential gaps are present, including inadequacies in baseline data and methodological limitations, alongside a reliance on assumptions rather than site-specific evidence. This leads to uncertainty concerning the magnitude and significance of impacts, especially where conclusions of negligible or non-significant effects are made without robust supporting data. The lack of adequate information

hinders a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty incompatible with statutory obligations.

Consequently, the application does not satisfy the evidential threshold stipulated by the Habitats Regulations necessary to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate alignment with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it remains unproven that impacts have been thoroughly assessed or that suitable safeguards are in place.

In summary, the combination of reliance on an undefined design envelope, the absence of specified mitigation strategies, and the gaps in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings inhibit a lawful and thorough assessment of environmental effects, placing the competent authority in a position where it cannot make an informed determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The proposed application lacks a rigorous assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a well-structured comparison of realistic alternatives based on their environmental effects, it provides a narrative that reflects the project's evolution. This approach does not adequately show that less harmful options have been identified, assessed, and chosen over more damaging solutions.

Furthermore, there is an absence of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not convincingly show that the developer has seriously contemplated positioning turbines further offshore, where potential visual, ecological, and coastal impacts could be diminished. The West Lewis coastline's sensitivity and the critical nature of proximity to shore in assessing impact highlight the significance of this analysis. The lack of such investigation prevents any justification that the proposed siting represents the least damaging option.

The shortcomings also extend to cable routing and landfall assessments, where there is inadequate evidence that alternative routes have been thoroughly considered to minimise impacts on sensitive receptors, including culturally and spiritually significant sites such as Barvas Cemetery. The failure to establish a clear avoidance strategy, coupled with the absence of comparative analysis, indicates that mitigation by design has not been implemented; rather, the application seems to rely on post-design

mitigation measures. Consequently, the proposal does not demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This represents a significant deviation from the established mitigation hierarchy, preventing the competent authority from assessing whether less harmful and more suitable alternatives are available.

From a policy standpoint, these inadequacies undermine compliance with National Planning Framework 4, especially concerning the protection of natural places, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment constitutes a material omission, contributing to the overall conclusion that the application has not been adequately evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of the marine ecology and protected species is inadequate and fails to provide a reliable understanding of the ecological receptors in the West Lewis coastal environment. This area is biologically active and sensitive, yet the baseline data is lacking, and the methodologies used do not capture the presence, behaviour, and habitat use of species effectively. Consequently, the assessment does not provide a solid evidential basis for evaluating potential impacts.

One significant oversight is the assessment of otters, a European Protected Species. The application does not adequately recognise and assess their active use of the coastal areas for foraging and movement. Without considering their core foraging range and behavioural patterns, the potential impacts of construction disturbance, noise, and increased activity have not been fully evaluated. This shortcoming undermines conclusions regarding the absence of significant effects on this species.

Furthermore, there are deficiencies in the assessment of basking sharks due to reliance on aerial surveys, which introduce considerable detection bias, particularly under Atlantic conditions. This method is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that show these waters are frequently used by the species. The failure to include or properly consider such data leads to an incomplete baseline and diminishes the reliability of the conclusions drawn.

The methodological flaws result in conclusions of negligible or non-significant effects being based on assumptions rather than solid evidence. The lack of adequate baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This leads to uncertainty regarding the actual risks to 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 has not properly identified or assessed protected species. The uncertainty introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt and necessitates the application of the precautionary principle. In light of this, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents a fundamentally flawed ornithological assessment that is riddled with significant gaps and internal inconsistencies, ultimately undermining its conclusions. Key foraging areas and migratory pathways along the west coast of the Isle of Lewis, which supports internationally important seabird populations, are not adequately addressed. Many of these seabird species are already in decline, yet the application does not demonstrate to the necessary evidential standard that they will remain unaffected by the proposed development.

There exists a stark contradiction in the application, where the developer claims there will be no significant adverse effects while also making a case for Habitats Regulations derogation, which is only applicable when significant harm is anticipated. This inconsistency raises serious questions about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the evidence presented. Furthermore, the assessment lacks sufficient evidence regarding the impact on seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, and fails to fully account for the importance of these feeding grounds. The reliance on modelling approaches further introduces uncertainty, particularly concerning vulnerable species like Kittiwakes and Fulmars, as the methodologies used are likely to underestimate mortality risks due to incomplete baseline data and limited understanding of behavioural responses.

The decision to site turbines within a recognised migratory corridor poses an additional significant risk, effectively creating a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The assessment does not adequately consider the long-term implications of potential sustained mortality within this corridor or the 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 findings, 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 inhibits a lawful conclusion supporting consent. Moreover, the identified deficiencies signify a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to show that internationally significant seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

Collectively, these issues render the assessment unreliable due to methodological weaknesses, internal inconsistencies, and a lack of sufficient evidence. Such shortcomings hinder a robust evaluation of impacts and lead to the conclusion that the application fails to meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The inadequacy of the assessment regarding cultural heritage and community identity is glaring, as it does not recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. Instead of understanding heritage as an evolving part of community life, the application adopts a simplistic view, reducing it to isolated, static assets.

A significant oversight is apparent in the treatment of sites of cultural importance, particularly the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active locations for burial and spiritual practice, yet they are incorrectly categorised as mere static features. This mischaracterisation neglects their ongoing significance and the implications of development on their surroundings, leading to an incomplete assessment of cultural effects and overlooking their vital role in community life.

Equally troubling is the failure to consider intangible cultural heritage, including the Gaelic language, traditions, and the enduring relationship between the local community and the coastal environment. These aspects are fundamental to the area's identity but have been disregarded in the assessment, marking a substantial omission that prevents a comprehensive understanding of the development's cultural impact.

Concerns regarding community rights and engagement further complicate the situation. The Gaelic-speaking population embodies a unique cultural identity with recognised characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of genuine engagement casts doubt on the legitimacy of the assessment and contravenes established principles of participation in

matters affecting cultural and environmental interests.

Moreover, a critical procedural failure lies in the absence of a compliant Island Communities Impact Assessment, a statutory requirement mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot adequately fulfil its legal obligation to assess the social, cultural, and economic ramifications on the island community, resulting in a significant legal gap.

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

In summary, the lack of assessment concerning living heritage, intangible cultural value, community rights, and adherence to statutory obligations culminates in a significant evidential gap. The cultural impacts of the proposed development have not been sufficiently evaluated, leaving the application lacking a robust foundation for assessing the true cultural costs involved.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment concerning seascape, landscape, and visual impacts is significantly lacking. It does not capture the extent of change or the sensitivity of the environment surrounding the West Lewis coastline. This area is characterised by its open Atlantic horizon, its undeveloped nature, and a strong sense of remoteness. The placement of large-scale turbines near the shoreline would result in a continuous industrial presence, fundamentally changing this character and causing a permanent transformation of the landscape.

The application fails to represent the extent of visual change accurately. The size and closeness of the turbines would dominate the views from residential areas, historic sites, and popular coastal locations. This would impact visual amenity and diminish the qualities of naturalness and remoteness. The assessment does not properly convey the significance of these impacts within the context of such a sensitive landscape.

Methodological issues also arise concerning the choice and presentation of visual viewpoints. It appears that these viewpoints may not fully represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and valued landscapes. This raises concerns that the scale of visual impact has been understated, which undermines the reliability of the assessment.

Additionally, there is a failure to evaluate the interconnectedness of landscape, seascape, and cultural heritage. Significant sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape that is visually and spatially linked to the Atlantic horizon. Instead of acknowledging their interdependence, the assessment treats these as separate entities, leading to an incomplete analysis of impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are perceived and their connection to the natural horizon. This constitutes not just a visual impact but a broader cultural and spatial harm that has not been sufficiently addressed in the application.

From a policy standpoint, the proposal contradicts National Planning Framework 4 concerning the safeguarding of natural places and historic assets. The scale of change is at odds 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 assertions of compliance with policy.

Moreover, it is evident that the identified impacts cannot be mitigated effectively. Given the scale, height, and proximity of the turbines, their presence would be both dominant and unavoidable. Consequently, the resulting change would be fundamental and permanent, rather than reducible 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 reliable evaluation and reinforce the conclusion that the proposal is inconsistent with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal raises significant concerns due to its incomplete assessment of construction and pollution risks, which lacks the necessary detail to understand the potential environmental impacts. It involves extensive seabed preparation and installation activities within a challenging Atlantic environment, yet there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans provided. Instead, the application suggests relying on mitigation and contingency measures that are to be formulated after consent, which makes it impossible to evaluate their sufficiency or effectiveness.

This approach is particularly alarming considering the vulnerability of the receiving environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are at risk from sediment disturbance and contamination. While the

application does acknowledge certain risks, including sediment mobilisation and possible chemical or oil spills, it fails to outline adequate strategies to prevent, control, or monitor these issues.

There is further ambiguity about the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without rigorous modelling and well-defined management strategies, it is impossible to gauge the extent, duration, or ecological implications of these impacts. This uncertainty extends to the potential effects on already sensitive marine species and habitats highlighted in the broader assessment.

Moreover, the lack of detailed emergency response procedures exacerbates these issues. By postponing the planning for contingencies until after consent is granted, the application compromises the ability to evaluate whether proper safeguards are established to handle pollution incidents. This introduces procedural risks and weakens the capacity of the competent authority to make informed decisions regarding environmental protection measures at the point of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements set out by the Environmental Impact Assessment framework. Significant effects and mitigation strategies must be appraised before consent can be granted, and the absence of this information means a lawful determination cannot be achieved. Additionally, the application does not demonstrate adherence to policy standards concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, detailed management plans, and clarity regarding potential impacts significantly undermines the assessment's validity. These deficiencies prevent a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application is fundamentally 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 application fails to provide a comprehensive assessment of the onshore infrastructure, which is crucial as it is part of a single integrated project along with the offshore turbines. The distinct separation in the assessment of these components leads to a fragmented understanding of the environmental and socio-economic impacts, obscuring the overall scale of the project's footprint.

Onshore elements involve significant undertakings, including cabling across protected moorland and the construction of a substation near Stornoway, along with access infrastructure that traverses sensitive landscapes. Excavation activities in deep peat areas, notably within Barvas Moor, pose serious risks, as this location is a vital carbon store and ecologically sensitive habitat. The assessment does not adequately cover these impacts, which hampers a full evaluation of the environmental consequences of the project.

By excluding or delaying the assessment of onshore impacts, the application fails to allow for a thorough understanding of cumulative effects. The Environmental Impact Assessment process mandates that all elements of a project be considered in conjunction; however, the separation of offshore and onshore assessments results in a lack of clarity regarding the combined impacts on peatlands, habitats, and local communities.

Moreover, the proposal raises substantial concerns about the integrity of sensitive habitats, such as machair systems and peatland environments, which are protected under policy. The application does not convincingly demonstrate that impacts on these ecosystems have been thoroughly evaluated or that effective avoidance measures have been put in place, creating a significant evidential gap related to biodiversity protection.

There are also pressing concerns regarding carbon balance. Disturbance to peatland can release stored carbon, potentially resulting in a carbon debt that is at odds with the intentions behind renewable energy development. The application inadequately addresses this matter or provides assurance that the overall carbon balance remains positive.

Additionally, routing infrastructure through active croft land presents potential conflicts with existing land use and legal rights. The application lacks evidence of initiation of the necessary consents or processes, raising doubts about both the feasibility and lawful implementation of the proposal.

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

In summary, the separation of project components, lack of thorough assessment, and insufficient evidence regarding environmental and land use impacts render this part of

the application incomplete and unreliable, ultimately obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The omission of any assessment regarding dark skies and nocturnal wildlife represents a significant evidential gap within the Environmental Impact Assessment. The exceptionally dark skies along the West Lewis coastline are integral to the area's environmental quality, cultural identity, and tourism value. The proposal includes the introduction of permanent red aviation lighting, which would be visible over considerable distances, thereby creating a continuous and intrusive "wall of light" across the western horizon that fundamentally alters 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 oversight is particularly significant in light of the importance of dark skies to the identity of the area and the growth of tourism sectors such as astro-tourism. The failure to consider these impacts reflects a clear deficiency in the overall landscape and environmental assessment.

Moreover, there is a critical lack of evaluation regarding the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting due to phototaxis, which can lead to disorientation and an increased risk of collision. The absence of a lighting impact assessment or a phototaxis study means that the application does not adequately assess how aviation lighting might affect these species or contribute to increased mortality rates.

This issue is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal activity or related risks. Kittiwakes, for example, may forage or migrate at night and are similarly vulnerable to disorientation caused by artificial lighting; however, this risk has not been addressed. The lack of site-specific night-time data results in a crucial gap in understanding the ecological impacts of the proposal.

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

In terms of policy, this omission contravenes the National Planning Framework 4,

particularly regarding the protection of natural places and the maintenance of environmental quality. Additionally, it undermines the comprehensive assessment of landscape and seascape impacts, as the night-time character is a fundamental aspect of the environment.

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

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal is fundamentally flawed in its ability to meet the criteria for sustainable development as required by statutory obligations, national policies, and evidential standards. This application echoes the principal concerns that resulted in the rejection of the Lewis Wind Power proposal in 2008, when the extent of industrialisation was deemed unacceptable. It is presented now under a policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing even more strongly.

The evidential basis for the proposal is both incomplete and unreliable. There are significant gaps in baseline data, and it relies on an undefined design envelope along with unspecified mitigation measures. Key impact pathways, particularly concerning nocturnal wildlife, the full extent of onshore infrastructure, and effects on tourism, are missing. As a result, the Environmental Impact Assessment fails to provide a complete understanding of likely significant effects or any residual impacts.

There are evident procedural shortcomings as well. The lack of a compliant Island Communities Impact Assessment breaches the statutory requirements set out in the Islands (Scotland) Act 2018, while the failure to provide a full Social Impact Assessment constitutes a significant omission. These shortcomings inhibit the competent authority from evaluating the potential impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal stands in direct opposition to National Planning Framework 4. It fails to adequately protect biodiversity, natural areas, and cultural heritage, does not demonstrate acceptable health and wellbeing impacts, and lacks evidence of any net economic benefit, particularly due to the absence of tourism impact modelling. Furthermore, the cumulative effects of both offshore and onshore elements have not been properly evaluated, obscuring the impacts on peatlands, carbon balance, habitats, and crofting land.

There are uncertainties and potentially significant environmental risks associated with the proposal. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and contain inconsistencies. The evidential standard required to rule out adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and obstructing a lawful conclusion regarding the acceptability of impacts.

This 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 connections, and negative impacts on tourism represent enduring effects that cannot be mitigated to an acceptable standard.

In summary, the application is both procedurally and substantively unfit for determination. The considerable information deficiencies, coupled with conflicts with policy and unresolved environmental risks, hinder any lawful, evidence-based decision-making. The competent authority must refuse consent on these grounds or activate the necessary regulatory provisions to obtain the missing information.

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

Additional Comments

There are better places for this installation, the area proposed is one of a kind, if we recklessly destroy continuously what is left?
Stop destroying rarity for greed.

Member of Public 272

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 under relevant marine licensing and Environmental Impact Assessment regulations. The objection arises from an examination of the Environmental Impact Assessment Report and associated documents, highlighting significant planning, environmental, cultural, and procedural shortcomings. 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 rich cultural identity. Concerns about compatibility with statutory requirements, national policy, and sustainable development principles are paramount given the scale, proximity, and design of the project.

The application does not provide a sufficient evidential basis for a lawful determination. It is notable that critical environmental data is absent, baseline information is both limited and inconsistent, and essential elements of the proposal are undefined. The implementation of a flexible design framework obscures the understanding of potential significant effects, while the reliance on unspecified mitigation measures raises questions about their efficacy. Consequently, the documentation fails to offer a comprehensive understanding of the impacts on the environment, culture, or community, and assertions of negligible or non-significant effects lack solid evidence.

There are evident and substantial policy conflicts as the proposal appears to contravene the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. These inconsistencies directly challenge the statutory tests necessary for consent and hinder the competent authority's ability to deem the development acceptable within policy frameworks.

The scale of the proposal is unprecedented for this location, with large turbines proposed in close proximity to the shoreline, raising serious concerns about landscape capacity, visual dominance, and environmental impact. Taken as a whole, the lack of adequate information, dependence on undefined mitigation strategies, evidential deficiencies, and clear policy violations illustrate that the application is incomplete and

cannot support a lawful determination. In light of these issues, the precautionary principle should be applied.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment fails to adequately represent the magnitude of visual change resulting from the proposed large-scale turbines along the West Lewis coastline. This area is characterised by its open Atlantic horizon, undeveloped nature, and strong sense of remoteness. The introduction of such turbines in close proximity to the shoreline would create a continuous industrial presence, fundamentally altering the coastal character and leading to a permanent transformation of the landscape.

The proposed development 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. Furthermore, there are significant methodological concerns regarding the selection and presentation of visual viewpoints. It appears that the viewpoints chosen may not adequately capture the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the risk of underestimating the magnitude of the visual impact, thereby undermining the assessment's reliability.

Additionally, the assessment neglects to evaluate 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 larger landscape setting, interconnected visually and spatially with the Atlantic horizon. Treating these sites as isolated assets fails to recognise their interdependence and results in an incomplete evaluation of the impacts on their settings and cultural significance. The industrialisation of the seascape would disrupt these relationships, changing the context in which heritage assets are experienced and severing their connection to the natural horizon. This represents a broader cultural and spatial harm that has not been adequately addressed within the application.

From a policy standpoint, the proposal contradicts National Planning Framework 4, which emphasises the importance of protecting natural places and historic assets. The scale of proposed changes is incompatible with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any claims of compliance with policy requirements.

Moreover, 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, resulting in a fundamental and permanent change that cannot be reduced

to an acceptable level through mitigation efforts. Overall, the assessment does not accurately capture the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings prevent a reliable evaluation and strongly indicate that the proposal is incompatible with the protection of this landscape.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed project includes significant onshore infrastructure, yet the assessment of these elements is materially incomplete, failing to consider the full extent of impacts arising from this single integrated project. The onshore works, which encompass cabling across protected moorland and the construction of a substation near Stornoway, are linked intrinsically to the offshore turbines. However, these components have been assessed separately, resulting in a fragmented approach that obscures the true scale of environmental and socio-economic effects.

Excavation across areas of deep peat, particularly within Barvas Moor, poses a threat to a significant carbon store and an ecologically sensitive habitat. The application does not provide a comprehensive assessment of these impacts, which prevents a full understanding of the project's overall environmental footprint. By excluding or deferring the evaluation of onshore impacts, the application inhibits proper assessment of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project be considered collectively; yet, the separation of offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities are not fully understood.

Concerns also arise regarding significant risks to sensitive habitats, including machair systems and peatland environments that are subject to policy protection. The application does not demonstrate that the impacts on these habitats have been fully assessed or that appropriate avoidance measures have been implemented. This omission creates a clear evidential gap concerning biodiversity protection. Furthermore, the disturbance of peatland could lead to the release of stored carbon, potentially resulting in a carbon debt that contradicts the goals of renewable energy development. The application inadequately addresses this issue and fails to show that the overall carbon balance remains beneficial.

Additionally, routing infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. There is insufficient evidence in the application that the necessary consents or processes have been initiated, which raises questions about deliverability and lawful implementation. From a policy perspective, the failure to assess the project as a whole and to demonstrate the protection of peatlands, habitats, and land use interests is in conflict with the National Marine Plan

and National Planning Framework 4. The inability to demonstrate that impacts can be avoided or mitigated further undermines the application.

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

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed, failing to meet the requirements of sustainable development as assessed against statutory duties, national policy, and evidential standards. It echoes the core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was a key concern. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application falls short.

There are significant gaps in the evidential basis for the proposal. The use of an undefined design envelope, unspecified mitigation measures, and critical omissions regarding impact pathways—including nocturnal wildlife, complete onshore infrastructure, and tourism effects—render the Environmental Impact Assessment inadequate. This incompleteness prevents a comprehensive understanding of likely significant effects and residual impacts.

The proposal also suffers from procedural deficiencies, notably the lack of a compliant Island Communities Impact Assessment, which breaches the statutory duties established by the Islands (Scotland) Act 2018. Furthermore, the failure to provide a full Social Impact Assessment is a material omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, thus deeming the application unfit for determination.

In addition, the proposal conflicts with National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural landscapes, and cultural heritage. The application fails to confirm that health and wellbeing impacts are acceptable and lacks tourism impact modelling, preventing it from evidencing a net economic benefit. The assessment of cumulative impacts from both offshore and onshore elements has not been conducted properly, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially severe. The assessments pertaining to marine ecology, seabirds, protected species,

and marine mammals are incomplete and contain inconsistencies. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been satisfied, which invokes the precautionary principle and precludes a lawful conclusion regarding the acceptability of impacts.

Moreover, the proposal would lead to significant and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual relationships, and the negative impacts on tourism represent permanent changes 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, obstructs any lawful and evidence-based decision-making. It is essential for the competent authority to either refuse consent on these grounds or to invoke the appropriate regulatory provisions to demand the submission of 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 273

Objection To Spiorad na Mara Offshore Wind Farm

References: MD-00011742 & MD-00011743

Dear Sir/Madam

This representation constitutes a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise from the scale, proximity, and design of the proposal, which fundamentally challenge its compatibility with statutory requirements, national policy, and the principles of sustainable development.

A review of the Environmental Impact Assessment Report and supporting documentation reveals significant deficiencies. The application does not provide an adequate evidential basis for a lawful determination, as critical environmental data is absent, and baseline information is both limited and inconsistent. Additionally, many aspects of the proposal remain undefined. The reliance on a flexible design framework complicates the understanding of likely significant effects, while unspecified mitigation measures hinder any assessment of their effectiveness. Consequently, the documentation fails to support an informed understanding of environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust evidence.

Furthermore, there are notable policy conflicts, as the proposal appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This inconsistency is particularly evident in relation to biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These policy conflicts

undermine the ability of the competent authority to determine that the development is acceptable within the required policy framework.

The unprecedented scale of the proposal, with large turbines positioned near the shoreline, introduces significant concerns regarding landscape capacity, visual dominance, and environmental impact. Taken together, the lack of sufficient information, dependence on undefined mitigation, evidential weaknesses, and clear policy non-compliance highlight that the application is incomplete and unable to support a lawful determination. In light of these issues, the precautionary principle must apply.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally lacking and fails to present a complete, transparent, or reliable overview of the potential environmental effects of the proposed development. The proposal employs a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations. This introduces considerable uncertainty and obstructs the consistent application of a worst-case scenario. As a result, the assessment's integrity is compromised, meaning the impacts detailed may not accurately represent the final construction, thereby limiting both public understanding and that of the competent authority regarding the true extent of environmental effects.

Moreover, the application places significant reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Consent is being requested on the premise that environmental harm will be mitigated at a later stage, which hampers any meaningful evaluation of the proposed measures' effectiveness or the assessment of residual impacts. This postponement of essential information to post-consent phases is procedurally unsound and contradicts the aims of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation measures are clearly defined prior to decision-making.

Evidential shortcomings are also present, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. These issues lead to uncertainty regarding the scale and significance of impacts, particularly 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 cannot meet statutory obligations.

Consequently, the application does not fulfil the evidential standard required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt.

This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, including requirements pertaining to biodiversity protection and environmental integrity, as it cannot be established that impacts have been thoroughly assessed or that appropriate safeguards are in place.

In summary, the reliance on an unspecified design envelope, the absence of defined mitigation measures, and existing gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies obstruct a lawful and thorough assessment of environmental effects, placing the competent authority in a position where it cannot make an informed decision based on the information supplied.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives presented in the application is fundamentally flawed and does not fulfil the statutory requirements outlined by the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of feasible alternatives based on their environmental effects, the application merely recounts the evolution of the project. This narrative fails to establish that less harmful options have been adequately identified, assessed, and favoured over more damaging ones.

Furthermore, there is a lack of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not show that the developer has meaningfully considered positioning the turbines further offshore, an option that would likely mitigate visual, ecological, and coastal impacts. The critical sensitivity of the West Lewis coastline and the significant role of proximity to shore in evaluating impacts make this omission particularly concerning, as it obscures any conclusion that the proposed siting is the least harmful option.

The inadequacies are evident in the cable routing and landfall assessment as well, where there is insufficient documentation indicating that alternative routes have been thoroughly examined to avoid or reduce impacts on sensitive receptors. This includes regions of cultural and spiritual significance, such as Barvas Cemetery. The absence of a clear avoidance strategy, coupled with the lack of comparative analysis, suggests that the approach taken has not incorporated mitigation by design, relying instead on measures intended for after the design phase.

As such, the application does not illustrate that environmental harm has been minimised through thoughtful site selection, layout, and infrastructure routing. This

represents a disregard for the established mitigation hierarchy and hampers the competent authority's ability to determine whether less harmful and more suitable alternatives exist. Without a comprehensive assessment of alternatives, it cannot be claimed that the proposal is sustainable or complies with policy guidelines.

From a policy standpoint, this inadequacy compromises alignment with National Planning Framework 4, especially concerning the safeguarding of natural environments, cultural heritage, and community wellbeing. The failure to conduct a structured and comparative assessment is a significant oversight that ultimately leads to the conclusion that the application has not been sufficiently evaluated and therefore cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

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

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

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

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

marine species and habitats.

From a regulatory standpoint, the application does not satisfy the criteria set forth by the Environmental Impact Assessment framework and the National Planning Framework 4, as it fails to properly identify and assess protected species. The uncertainty introduced by these deficiencies prevents the dismissal of potential adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these conditions, granting consent would not be lawful.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents a fundamental contradiction by asserting that there will be no significant adverse effects, while simultaneously making a Habitats Regulations derogation case, which is only required when significant harm is anticipated. This inconsistency raises serious concerns about the reliability of the ornithological assessment, suggesting that the conclusions reached are not backed by adequate evidence. The assessment contains significant gaps and internal inconsistencies that undermine its validity.

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 provide sufficient evidence demonstrating that these species will not be adversely affected. Key foraging areas and migratory pathways are present in the development site, yet the assessment does not effectively evaluate the potential consequences of displacement, collision risk, or habitat loss for these birds.

The methodologies used in the assessment are likely to underestimate mortality rates, particularly for species in severe decline, such as Kittiwakes and Fulmars. There is a significant reliance on modelling approaches, which introduces uncertainty regarding the true impact on seabirds associated with protected sites, including the Lewis Peatlands and St Kilda. The importance of these feeding grounds is not fully accounted for, raising further concerns about the adequacy of the analysis.

Additionally, the positioning of turbines within a recognised migratory corridor poses an increased risk, creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently assess

the long-term implications of potential sustained mortality within this corridor or the effects 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 the gaps in data and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This situation activates the precautionary principle, which precludes a lawful conclusion in favour of consent.

Furthermore, the identified deficiencies demonstrate a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to show that internationally important seabird populations will not be adversely affected places the proposal at odds with national policy.

In summary, the assessment is fundamentally unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. These flaws prevent a comprehensive evaluation of impacts and contribute to the overarching conclusion that the application does not satisfy the statutory requirements necessary for its determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment fails to adequately consider the cultural heritage and community identity of the West Lewis coastline, which is a living cultural landscape where the environment, language, tradition, and community are deeply interconnected. It adopts a reductive view of heritage, treating it as a collection of isolated and static assets rather than recognising their ongoing social, cultural, and spiritual significance within the community.

A notable shortcoming is the treatment of culturally significant sites, specifically the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active burial sites and places for spiritual practice, yet they are mischaracterised as static features in the assessment. This oversight neglects their continued use, meaning, and the impact that development may have on their settings. As a result, the cultural effects are incompletely evaluated, disregarding their integral role in community life.

Moreover, the assessment neglects intangible cultural heritage, such as the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These aspects are fundamental to the area's identity yet are entirely omitted from the evaluation, representing a significant oversight. The cultural impact of the development remains poorly understood without the consideration of

these vital factors.

There are also serious concerns regarding community rights and engagement. The Gaelic-speaking population possesses a unique cultural identity with characteristics that align with those of Indigenous Peoples. However, there has been no process of Free, Prior and Informed Consent conducted. This lack of meaningful engagement weakens the credibility of the assessment and fails to adhere to established principles of participation concerning cultural and environmental matters.

Additionally, a critical procedural failure is the absence of a compliant Island Communities Impact Assessment, which is a legal requirement under the Islands (Scotland) Act 2018. The absence of this assessment means that the competent authority is unable to meet its legal obligations to evaluate the social, cultural, and economic impacts on the island community. This alone renders the determination unlawful.

From a policy standpoint, these issues place the proposal in direct conflict with the National Planning Framework 4, particularly regarding the protection of historic assets and places. The oversight of both tangible and intangible heritage, alongside the failure to recognise living cultural practices, signifies a clear violation of policy requirements.

In summary, the failure to assess living heritage, intangible cultural values, community rights, and statutory obligations leads to a substantial evidential gap. The cultural impacts of the development have not been sufficiently evaluated, and the application lacks a robust foundation for understanding the true cultural costs of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the Social Impact Assessment is troubling and undermines the Environmental Impact Assessment process. Although the developer engaged with local residents through focus groups, the full report has not been published, creating a significant evidential gap. This omission prevents both the public and the competent authority from grasping the complete extent of social risks identified by the developer's own research.

Residents are reportedly experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts are based on direct engagement rather than speculation. However, without access to the full assessment, it is impossible to properly scrutinise the findings or to ascertain their significance in the decision-making process.

Moreover, there is a perception that the proposal poses a direct threat to community

identity and cohesion, with the developer's own findings noting “cultural loss.” Despite this acknowledgment, the impacts have not been adequately incorporated into the main application or given the necessary weight. The withholding of the complete Social Impact Assessment obscures the actual human and social costs associated with the development.

From a policy standpoint, the application fails to show compliance with National Planning Framework 4, particularly regarding health and wellbeing. Development proposals must promote positive health outcomes and mitigate harm; however, existing adverse effects have not been thoroughly disclosed. The absence of the complete assessment means that compliance with this policy cannot be substantiated.

Procedurally, the implications are serious. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment, which signifies a material omission and a failure to meet the evidential requirements of the Environmental Impact Assessment framework.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The application proposes the introduction of large-scale turbines along the West Lewis coastline, an area renowned for its open Atlantic horizon and undeveloped character. This would result in a continuous industrial presence that fundamentally alters the landscape, leading to a permanent and irreversible transformation. The assessment provided does not adequately capture the magnitude of the visual change that would occur. The scale and proximity of the turbines are such that they would dominate views from nearby residential areas, historic sites, and frequently visited coastal locations, which would severely impact visual amenity and diminish the essential qualities of naturalness and remoteness.

Methodological concerns arise from the selection and presentation of visual viewpoints within the assessment. Evidence indicates that the chosen viewpoints may not adequately reflect the most sensitive receptors or worst-case scenarios, particularly regarding key cultural heritage sites and high-value landscapes. This raises the possibility that the visual impact has been understated, casting doubt on the assessment's reliability.

Moreover, the assessment fails to consider the interconnectedness of landscape,

seascape, and cultural heritage. Notably, sites like the Calanais Standing Stones and other Scheduled Monuments form part of a broader landscape linked by visual and spatial relationships to the Atlantic horizon. Treating these assets in isolation neglects their interdependence, resulting in an incomplete evaluation of the 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 severing their connection to the natural horizon. This not only represents a visual impact but also inflicts broader cultural and spatial harm that has not been sufficiently assessed in the application.

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

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

In summary, the assessment fails to represent the scale of impact accurately, does not reflect the sensitivity of the environment, and overlooks the interconnected nature of landscape and heritage. These deficiencies hinder a reliable evaluation, solidifying 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 within the Atlantic's high-energy environment. However, the assessment of construction and pollution risks is inadequate and lacks the necessary detail to evaluate potential environmental effects. The application fails to present fully developed Construction Environmental Management Plans or Pollution Prevention Plans, instead relying on mitigation and contingency measures that are to be formulated after consent is granted. This approach hinders any substantial assessment of their potential effectiveness or adequacy.

The reliance on unspecified future measures raises serious concerns, particularly given the delicate nature of the receiving environment. The West Lewis coastline is known for its clean coastal waters and vital habitats, both of which are at risk from sediment disturbance and contamination. Although the application acknowledges risks such as

sediment mobilisation and the possibility of chemical or oil spills, it does not sufficiently outline how these risks will be prevented, controlled, or monitored.

Moreover, there is considerable uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without rigorous modelling and well-defined management strategies, it becomes impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty is also applicable to the potential effects on marine species and habitats that have already been identified as sensitive within the broader assessment.

The lack of comprehensive emergency response procedures further exacerbates these concerns. By postponing contingency planning to a post-consent phase, the application obstructs the evaluation of whether adequate safeguards are in place to respond to pollution incidents. This introduces procedural risks and diminishes the capacity of the competent authority to adequately assess environmental protection measures at the decision-making stage.

From a regulatory standpoint, the deferral of essential environmental safeguards is at odds with the stipulations of the Environmental Impact Assessment regime. Significant effects and necessary mitigation must be evaluated prior to granting consent; the absence of such information means that a lawful determination cannot be made. Additionally, the application does not illustrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the deficiencies in defined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts collectively render the assessment materially inadequate. These shortcomings preclude a thorough evaluation of construction and pollution risks and further emphasise that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to both a diverse marine ecosystem and an active fishing industry. However, the application under consideration lacks a robust evaluation of the ecological and socio-economic impacts associated with the proposed development. It does not adequately demonstrate that these vital habitats and activities can be preserved without significant disruption.

A significant concern arises from the assumption that fishing activities can be displaced without any consequences. The application fails to provide evidence that alternative fishing grounds exist, are accessible, or can sustain the additional pressure from displaced fishing efforts. This is a critical oversight, as such displacement could lead to

overfishing in other areas, potentially resulting in severe economic repercussions for the local fishing fleet. Without a clear, evidence-based assessment, the implications for fisheries and local livelihoods remain poorly understood.

Moreover, the proposal poses considerable risks to marine species, particularly due to underwater noise from construction activities. The use of high-energy hammer piling over an extended timeframe is anticipated to disturb marine life over large distances, with particular concern for species such as dolphins. The expected disturbance to a significant portion of the local bottlenose dolphin population raises alarming questions, yet the application tends to minimise the importance of these effects, lacking sufficient supporting evidence.

The application also presents an inconsistency regarding the necessity for licences to permit harm to European Protected Species, acknowledging the need while simultaneously describing the impacts as negligible. This contradiction raises doubts about the credibility of the assessment and brings to light serious compliance issues with the Habitats Regulations, especially when harm is expected to necessitate legal authorisation.

Furthermore, the assessment overlooks the cumulative impacts of various pressures, 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 the socio-economic landscape.

From a policy standpoint, the application fails to align with the principles outlined in National Planning Framework 4 and the National Marine Plan. It does not adequately demonstrate that the development can coexist with current marine users or avoid unacceptable consequences for marine biodiversity. This prevents any conclusion that the proposal is a model of sustainable development.

In summary, the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies 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 presents a fragmented assessment of onshore infrastructure, which is materially incomplete and fails to adequately account for the interrelated impacts of the offshore turbines and onshore works. This separation obscures the true environmental and socio-economic consequences of what is fundamentally a single integrated project. The onshore components involve cabling that traverses protected

moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. Importantly, these activities entail excavation in areas of deep peat, particularly within Barvas Moor, an essential carbon store and an ecologically sensitive habitat. The application lacks a thorough evaluation of these impacts, which inhibits a full understanding of the project's overall environmental footprint.

Furthermore, the approach taken prevents a proper assessment of cumulative effects, as the Environmental Impact Assessment process mandates that all aspects of a project must be evaluated collectively. The existing separation of offshore and onshore components fails to capture the combined impacts on peatlands, habitats, and local communities, leaving significant gaps in understanding.

There are critical risks to sensitive habitats, including machair systems and peatland environments, which are protected by policy. The application does not convincingly demonstrate that impacts on these ecosystems have been comprehensively evaluated or that adequate avoidance measures have been considered, revealing a significant evidential shortfall concerning biodiversity protection.

The proposal also introduces concerns related to carbon balance; the disruption of peatland has the potential to release stored carbon, thereby creating a carbon debt that undermines the objectives of renewable energy development. The application does not sufficiently tackle this issue or confirm that the overall carbon balance remains advantageous.

In addition, the routing of infrastructure through active croft land raises potential conflicts with established land use and legal rights. There is a lack of evidence indicating that necessary consents or processes have been initiated, which prompts serious questions regarding the deliverability and lawful execution of the project.

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

In summary, the separation of project components, the absence of a comprehensive evaluation, and the lack of substantiating evidence regarding environmental and land use impacts culminate in an application that is incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment omits the assessment of dark skies and nocturnal wildlife, which is a significant oversight. The West Lewis coastline features exceptionally dark skies, which are vital for environmental quality, cultural identity, and tourism. The proposal introduces permanent red aviation lighting that would be visible over long distances, resulting in a continuous and intrusive "wall of light" effect that would fundamentally change the night-time environment.

The application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experience of residents and visitors. This lack of assessment is critical given the importance of dark skies to the area's identity and the growing tourism sector focused on astro-tourism. The absence of these considerations results in a clear deficiency in the overall landscape and environmental assessment.

Moreover, there is no evaluation of how the proposed lighting would affect nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to their phototactic behaviour, which can cause disorientation and an increased risk of collisions. The application does not include any lighting impact assessment or phototaxis study, leaving unassessed the potential effects of aviation lighting on these species and the risk of increased mortality.

This issue is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activity or related risks. Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this risk has not been evaluated. The absence of site-specific night-time data creates a significant gap in understanding ecological impacts.

Without an assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites could be adversely affected. The necessary evidential standard to rule out adverse effects beyond reasonable scientific doubt cannot be achieved, which invokes the precautionary principle and hinders a lawful determination.

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

In summary, the absence of an assessment for dark skies and nocturnal wildlife represents a substantial evidential gap. The lack of baseline data, impact modelling,

and species-specific analysis renders the application incomplete and incapable of facilitating a lawful determination.

TOURISM

The application does not adequately assess tourism impacts, which are crucial for the Isle of Lewis economy. This sector relies heavily on the area's wild coastline, nearly untouched landscapes, dark skies, and feeling of remoteness. While it is acknowledged that 86% of visitors are attracted by the scenery, there is no quantitative analysis regarding how large-scale offshore infrastructure might influence visitor numbers, their behaviour, or the overall economic contribution of tourism.

Tourism on the Isle of Lewis has increased considerably, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and constitutes up to 16% of the island's economy. However, the application does not evaluate how the potential industrialisation of the seascape and deterioration of environmental quality could affect Tourism Gross Value Added or the wider economic resilience. Without this analysis, it remains unclear if the development would benefit or harm this growing sector.

Additionally, the assessment neglects to take into account the significance of environmental quality in fostering tourism, particularly the value of unspoiled landscapes and dark skies for visitor experiences, as well as emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortcoming, creating a considerable gap in understanding the impacts on a vital and expanding aspect of the local economy.

In an island community that has limited economic diversification, the inadequate evaluation of tourism impacts has broader repercussions for local employment, businesses, and community sustainability. The omission of a proper Island Communities Impact Assessment means that these economic vulnerabilities have not been thoroughly examined as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, particularly concerning economic impacts and the need to show a net benefit. It also contradicts strategic goals that prioritise tourism as a growth sector and fails to provide adequate evidence for the competent authority to assess the economic implications of the proposal.

Overall, the shortcomings in quantifying tourism impacts, assessing the environmental factors influencing visitor behaviour, and acknowledging the island's economic reliance create a significant evidential gap. This limits a thorough evaluation of economic effects and leads to the conclusion that the application lacks completeness.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements for sustainable development as outlined in statutory duties, national policy, and evidential standards. The proposal raises the same core issues that resulted in the refusal of the Lewis Wind Power application in 2008, where the level of industrialisation was deemed unacceptable. Presenting this application under a strengthened policy framework, which places greater emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing, does not address the fundamental shortcomings.

Critical gaps in baseline data hinder a complete and reliable evidential basis for assessment. The proposal continues to rely on an undefined design envelope and on unspecified mitigation measures, while omitting important impact pathways such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism consequences. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a thorough understanding of the likely significant effects or residual impacts.

There are evident procedural failures within the application. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the failure to disclose a full Social Impact Assessment represents a material omission. These inadequacies prevent the competent authority from properly evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

In addition, the proposal contradicts the National Planning Framework 4, as it does not demonstrate adequate protection for biodiversity, natural places, and cultural heritage. There is no evidence presented that health and wellbeing impacts are acceptable, nor is there any modelling of tourism impacts to support claims of net economic benefit. The assessment of cumulative impacts from offshore and onshore elements is insufficient, obscuring effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The evidential threshold required to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful determination of acceptable impacts.

Moreover, the proposal is poised to cause substantial and irreversible changes to a sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual connections, and negative implications for tourism are all permanent effects that cannot be mitigated to an acceptable level.

In conclusion, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, alongside policy conflicts and unresolved environmental risks, inhibit a lawful and evidence-based decision. Therefore, the competent authority must either refuse consent based on these grounds or invoke relevant regulatory provisions to demand the missing information.

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

Additional Comments

Turbines of this scale are known to create atmospheric wake effects that extend 100km behind the infrastructure. This turbulence creates microclimate disruption and also depletes the energy potential of other adjacent wind energy infrastructure. Currently the crown estate regulations require a 7.5km minimum buffer zone, but current UK level decisions and planning precedents are challenging this, and seeking much greater protection, such as the Awel y Mor wind farm dispute, or Orsted's dispute in the Irish sea. The UK secretary of state has made interventions that form legal precedent due to these very real impacts.

Therefore, has the planning department or energy consents unit factored in a 40% energy reduction for all onshore wind infrastructure impacted by the Spiorad na Mara development? And have these wake effects been considered in terms of their impact on all potential offshore and onshore infrastructure that might be built in future?

The answer is no, because the Scottish planning system has refused to acknowledge the precautionary principle established by the Rio Declaration in 1994, and is happy to proceed in ignorance of any and all critical science that would challenge infrastructure roll out. Judgement day will come on the people who oversee this scale of environmental destruction when better alternatives exist.

Member of Public 274

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 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.

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.'

Significant Adverse Impacts on Marine Mammals and Protected Marine Habitats: The Outer Hebrides are described by the Scottish Government's own scientists as "probably the richest area of the UK for marine mammals with around 20 species of cetacean recorded in the region over the last 30 years" (Scottish Marine and Freshwater Science Vol. 5 No. 9). The site lies adjacent to the Inner Hebrides and Minches SAC - the largest harbour porpoise SAC in Europe - within the wider range of the North-east Lewis MPA for Risso's dolphin, within documented fin and sperm whale migration corridors (Blue Corridors initiative), and within the wider feeding and habitat range of minke, humpback and sei whales, and within the foraging range of the Monach Isles grey seal colony (the largest in Europe). The EIAR fails to reflect this internationally significant baseline in its significance conclusions and cannot demonstrate, to the legal standard required, that adverse effects on these protected sites and species will be avoided. Under the Habitats Regulations Appraisal process, consent must be refused unless Scottish Ministers are satisfied beyond reasonable scientific doubt that the integrity of European sites will not be adversely affected (NatureScot HRA guidance). That standard has not been met.

Construction noise: The developer's own noise modelling (EIAR Appendix 19.2) provides for up to 5.5 hours of percussive piling per day, up to 10,635 strikes per pile per day,

hammer energies up to 5,000 kJ, and 1,563 pin piles across two consecutive construction years (April–October). The EIAR itself acknowledges that "harbour porpoises are widely regarded as the most sensitive marine mammal receptor to underwater noise" and that behavioural disturbance can occur up to 70 km from piling (Bailey et al., 2010, cited in Chapter 13). The proposed piling window coincides with peak cetacean seasonal density and with harbour seal pupping (June–July), triggering the prohibition on deliberate disturbance of European Protected Species during breeding and rearing periods under the Conservation of Habitats and Species Regulations 2017 and Section 9 of the Wildlife and Countryside Act 1981.

The developer's own underwater noise modelling (EIAR Appendix 13.3) confirms that, even with noise mitigation applied, percussive piling at the northernmost foundation location generates a PTS (permanent auditory injury) range of up to 1,500 m for low-frequency cetaceans and a TTS (temporary auditory injury) range of up to 49 km. These are the developer's own figures, after mitigation. Low-frequency cetaceans include minke, fin, sei and humpback whales - all species documented in these waters. A 49 km auditory injury zone, repeated across an April–October piling window for two consecutive years, cannot credibly be reconciled with a classification of effects as "not significant."

NMP Policy GEN 13: development should avoid significant adverse effects of man-made noise and vibration on species sensitive to such effects. The EIAR predicts disturbance to 9.186% of the Risso's dolphin management unit population and 27.7% of the coastal bottlenose dolphin population from piling noise, yet classifies these effects as "not significant." GEN 13 sets an avoidance standard, not a tolerance threshold.

The developer's own EPS and Basking Shark Risk Assessment (submitted to Marine Scotland, 22 February 2023) formally acknowledges risk of disturbance to minke whale, harbour porpoise, common dolphin, bottlenose dolphin, grey seal and basking shark from survey work alone. Full construction at this scale cannot credibly be claimed to present a lesser risk.

The 2023 Tolsta Stranding: In July 2023, 54 of 55 long-finned pilot whales died on Traigh Mhòr beach while geophysical surveys were being carried out at this lease area. The Scottish Government investigation could not rule out anthropogenic contribution and explicitly acknowledged limitations in the acoustic detection capability of the recorders used. This recent and devastating event must weigh heavily in this decision.

Priority Marine Features and seabed disturbance: Kelp beds - confirmed present across 10 km² within the Study Area and designated as a PMF and blue carbon habitat - are assessed as sustaining "minor adverse" impact, with no compensatory measures proposed. Maerl beds, horse mussel beds, fan mussel aggregations and cold-water coral reefs (all Scottish PMFs) are either excluded on the basis of decade-old desktop

data (Tyler-Walters et al., 2016) or not mentioned at all. The developer concedes that its primary mitigation - micro-siting of turbines and cables - "cannot be quantified until detailed design and further site-specific investigations are complete."

NMP GEN 5: safeguard natural carbon sinks including kelp beds. NMP GEN 9: do not result in significant impact on the national status of Priority Marine Features, and protect and enhance the health of the marine area.

Cumulative and in-combination effects: The Habitats Regulations require assessment of cumulative effects with other plans and projects. The Scottish Government's own 2026 ICIA Screening Report concedes that Scottish offshore wind plans are "likely...to undergo the derogations process under the Habitats Regulations." Spiorad na Mara is one of several large developments proposed in or adjacent to these waters; the cumulative assessment does not rigorously meet this requirement. NMP GEN 21 requires cumulative impacts affecting the ecosystem to be addressed.

Inadequate assessment and deferred mitigation: The joint representation from the Hebridean Whale and Dolphin Trust and Whale and Dolphin Conservation states that baseline cetacean data is "severely lacking." Proposed mitigation (MMOs, PAM, soft-start) is designed to address acute physical injury, not behavioural displacement; JNCC guidance confirms PAM has "limited range" for harbour porpoise and is "not suitable" for seals and baleen whales. Key mitigation is deferred to a post-consent Marine Mammal Mitigation Protocol, preventing Scottish Ministers from assessing adequacy at the point of determination - contrary to the beyond-reasonable-scientific-doubt standard required under the Habitats Regulations. Peer-reviewed monitoring at Scottish offshore wind farm construction sites (Benhemma-Le Gall et al. 2021, *Frontiers in Marine Science*) observed harbour porpoise displacement up to 12 km from pile-driving and 4 km from construction vessels alone - distances that no MMO, PAM or soft-start zone can address.

The EPS licence contradiction: The EIAR identifies that activities may require an EPS licence due to disturbance at a level requiring legal derogation, while simultaneously concluding residual effects are "negligible or minor." Under the Conservation of Habitats and Species Regulations 2017, an EPS licence can only be granted where no satisfactory alternative exists, imperative reasons of overriding public interest apply, and favourable conservation status is maintained. The EIAR demonstrates none of these.

Basking sharks (IUCN Endangered) were recorded by the developer's own July 2023 aerial survey (EIAR Appendix 13.1). The EIAR does not adequately assess EMF impacts from subsea cables on elasmobranchs, despite Scottish Government ScotMER research identifying this as an unresolved evidence gap (FF.07).

No alternative solutions: Under the Habitats Regulations, consent cannot be granted if alternative solutions exist. Other ScotWind sites are available in waters without the same density of European Protected Species and designated habitats, and the existence of those alternatives is directly relevant to whether consent for this site can lawfully proceed.

Consent would therefore breach or inadequately address the Conservation (Natural Habitats &c.) Regulations 1994, the Conservation of Habitats and Species Regulations 2017, the Marine (Scotland) Act 2010, Section 9 of the Wildlife and Countryside Act 1981, NMP Policies GEN 5, GEN 9, GEN 13 and GEN 21, and ASCOBANS Resolution 7.6 (2016) on underwater noise.

My further objection points:

Scotland's marine wildlife deserves to live, we must recognise this for what it is: destruction of an integral ecosystem in the name of greenwashing. Our wildlife needs to be protected.

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 275

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.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

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

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

Collectively, the reliance on an ambiguous design envelope, the lack of specified mitigation strategies, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings prevent a lawful and rigorous assessment of environmental effects and leave the competent authority without the necessary information to make an informed determination regarding the application.

ASSESSMENT OF ALTERNATIVES

The application fails to provide a structured and reasoned comparison of realistic alternatives, which is a fundamental requirement of the Environmental Impact Assessment regime. Instead of presenting a transparent analysis based on environmental effects, it offers a narrative account of project development. This omission indicates that the identification, assessment, and selection of less harmful options in preference to more damaging solutions have not been adequately conducted.

Furthermore, there is a notable lack of evidence-based comparison regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not show that the possibility of placing turbines further offshore has been seriously evaluated, despite the likely reduction in visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline, coupled with the significance of proximity to the shore in assessing impact, underscores the importance of this analysis. Without it, one cannot conclude that the proposed siting is the least damaging option.

This inadequacy extends to the assessment of cable routing and landfall, where there is little evidence that alternative routes have been thoroughly explored to mitigate impacts on sensitive receptors, including culturally and spiritually significant locations such as Barvas Cemetery. The absence of a clear strategy to avoid impacts, along with the lack of comparative analysis, suggests that mitigation by design has not been applied, relying instead on post-design measures.

Consequently, the application does not demonstrate that environmental harm has been effectively minimised through careful site selection, layout, and infrastructure routing. This failure to adhere to the established mitigation hierarchy hinders the competent authority's ability to assess whether more appropriate and less harmful alternatives exist. The lack of a robust alternatives assessment ultimately raises questions about the sustainability and policy compliance of the proposal.

From a policy standpoint, this deficiency undermines adherence to National Planning Framework 4, especially regarding the protection of natural places, cultural heritage,

and community wellbeing. The absence of a structured and comparative assessment is a significant oversight that contributes to the overall conclusion that the application has not been sufficiently evaluated, rendering it incapable of supporting a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is inadequate, failing to give a complete understanding of the ecological receptors in the West Lewis coastal environment. This region is highly sensitive and biologically active, yet the baseline data is lacking. The methodologies used do not effectively capture the presence, behaviour, or habitat use of marine species. Consequently, the assessment does not provide a reliable basis for evaluating potential impacts.

A significant gap exists in the consideration of otters, which are a European Protected Species. The application does not properly recognise their active use of coastal areas for foraging and movement. Without proper assessment of their core foraging range and behavioural patterns, the potential impacts of construction disturbance, noise, and increased activity remain unexamined. This lack of thorough evaluation undermines claims regarding the absence of significant effects on otters.

Moreover, the evaluation of basking sharks also presents shortcomings. The reliance on aerial surveys introduces a detection bias, particularly in Atlantic conditions, likely leading to an underestimation of their presence. Established land-based observations show frequent usage of these waters, which were not adequately considered in the assessment. This omission results in an incomplete baseline and undermines the conclusions drawn.

These methodological shortcomings mean that claims of negligible or non-significant effects are based on assumptions instead of solid evidence. The absence of sufficient baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty clouds the true extent of risk to marine species and their habitats.

From a regulatory standpoint, the application does not meet the standards set by the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. The uncertainty introduced by the deficiencies prevents the dismissal of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, granting consent is not legally permissible.

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

unsupported conclusions renders the assessment untrustworthy. These issues prevent a thorough evaluation of the impacts on marine ecology and protected species, leading to the conclusion that the application is lacking 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 of cultural heritage and community identity is fundamentally flawed, as it does not recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are intricately linked. Instead of acknowledging the ongoing social, cultural, and spiritual significance of heritage, the application reduces it to a collection of isolated, static assets.

There is a notable inadequacy in how culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas, are evaluated. These sites serve as active places of burial and spiritual practice, yet they are mischaracterised as static features. This oversight fails to consider their current use, meaning, and the impact of development on their environment. Consequently, this leads to an incomplete assessment of cultural effects and neglects the essential role these sites play in community life.

Moreover, the evaluation does not encompass intangible cultural heritage, which includes the Gaelic language, local traditions, and the longstanding relationship between the community and the coastal environment. These elements are crucial to the area's identity but have been wholly overlooked in the assessment, representing a serious omission. Without the inclusion of these factors, the cultural impact of the proposed development cannot be accurately understood.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity that aligns with characteristics of an Indigenous People, yet the application has not undertaken a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the credibility of the assessment and fails to align with established principles of participation in decisions that affect cultural and environmental interests.

A significant procedural oversight is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The failure to carry out 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 is sufficient to render a lawful determination impossible.

From a policy standpoint, these shortcomings put the proposal in direct conflict with National Planning Framework 4, particularly concerning the preservation of historic assets and places. The neglect to consider both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, clearly deviates from policy expectations.

In summary, the combined failures to assess living heritage, intangible cultural value, community rights, and legal obligations create a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application fails to offer a solid basis for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal lacks a complete assessment of social impacts, health, and wellbeing. The developer commissioned a Social Impact Assessment that included focus groups with local residents; however, the full report has not been published. This omission creates a significant gap in evidence and hinders both public understanding and the competent authority's ability to grasp the full extent of social risks identified in the developer's research.

Residents are reportedly experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts come from direct engagement with the community and are not speculative. Nonetheless, the failure to disclose the complete assessment restricts proper scrutiny of these findings and limits the determination of their significance in the decision-making process.

Moreover, the proposal is seen as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite this, these effects have not been adequately incorporated into the main application, nor have they been given appropriate weight. The withholding of the full Social Impact Assessment obscures the real human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is critical for developments of this magnitude, especially where community character and functioning may be affected. By not providing the complete dataset, the application fails to offer a robust evidential basis to evaluate the balance between benefits and harms.

From a policy standpoint, the application does not show compliance with National Planning Framework 4 concerning health and wellbeing. Developments must promote positive health outcomes and mitigate harm, yet the available evidence points to existing adverse effects that remain undisclosed. Without the full assessment, compliance with this policy cannot be established.

The procedural implications are substantial. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This constitutes 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, paired with evidence of existing negative impacts, results in an incomplete and unreliable assessment. This situation obstructs a lawful determination and supports the conclusion that the application does not possess sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of visual impacts, seascape, and landscape is fundamentally inadequate, failing to capture the extent of change and the sensitivity of the environment. The West Lewis coastline is characterised by an open Atlantic horizon, a lack of development, and a strong sense of isolation. The proposed large-scale turbines situated near the shoreline would introduce a continuous industrial presence, fundamentally altering this landscape and leading to a permanent transformation of its character.

The application does not sufficiently represent the extent of visual alteration. Due to their scale and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and diminishing the qualities of naturalness and remoteness. The assessment does not convey the true significance of this impact within the context of such a sensitive landscape.

Methodological issues also arise concerning the choice and representation of visual viewpoints. It appears that the selected viewpoints do not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and valuable landscapes. This raises concerns that the magnitude of visual impact has been underestimated, thus compromising the reliability of the assessment.

Moreover, there is a notable lack of consideration for the interconnected relationship between the landscape, seascape, and cultural heritage. Significant sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape that is visually and spatially linked to the Atlantic horizon. The assessment approaches these sites as isolated rather than recognising their interdependence, leading to an incomplete understanding of the impacts on their context and cultural significance.

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 constitutes not only a visual impact but also a more profound cultural and spatial detriment that has not been adequately examined within the application.

From a policy standpoint, the proposal contradicts the principles of National Planning Framework 4 concerning the safeguarding of natural areas and historic assets. The scale of transformation is at odds with the requirements to protect landscape character, visual amenity, and the settings of culturally significant locations. The lack of a rigorous worst-case assessment further weakens the argument for compliance with policy guidelines.

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 change would be fundamental and irreversible, rather than reducible to an acceptable level through mitigation efforts.

Collectively, these issues highlight the assessment's failure to accurately portray the impact's scale, the environment's sensitivity, and the interconnectedness of landscape and heritage. Such deficiencies hinder a reliable evaluation and further support the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application proposes substantial 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 the likely environmental effects. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans, as the application relies on mitigation and contingency measures to be prepared after consent. This reliance on undefined future measures is particularly concerning given the sensitivity of the receiving environment.

The West Lewis coastline supports clean coastal waters and important habitats that are

vulnerable to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it does not provide sufficient detail on how these risks will be prevented, controlled, or monitored. Additionally, there is uncertainty regarding the scale and behaviour of sediment plumes from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to determine the extent, duration, or ecological effects of these impacts. This uncertainty also extends to potential effects on marine species and habitats identified as sensitive within the wider assessment.

Compounding these concerns is the absence of detailed emergency response procedures. By deferring contingency planning to a post-consent stage, the application hinders the evaluation of whether adequate safeguards are in place to respond to pollution events. This introduces procedural risk and undermines the ability of the competent authority to assess environmental protection measures at the point of determination.

From a regulatory standpoint, deferring critical environmental safeguards conflicts with the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be assessed prior to consent, and in the absence of such information, a lawful determination cannot be made. Furthermore, the application fails to demonstrate compliance with policy requirements related to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The application proposes a development that presents substantial risks to marine species and the local fishing industry. The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing sector. However, the assessment of fisheries and marine life is insufficient, lacking a robust evaluation of both ecological and socio-economic impacts. Notably, the application does not adequately demonstrate how these habitats and activities can be protected or maintained without significant disruption.

A significant concern arises from the assumption that fishing activities can be displaced without any consequences. The application fails to provide evidence that alternative fishing grounds are available, accessible, or capable of supporting increased pressure

from displaced activities. This oversight is critical, as it poses a risk of overfishing in other areas and could lead to wider economic repercussions for the local fishing fleet. In the absence of a clear and evidence-based assessment, the potential impacts on fisheries and local livelihoods remain unclear.

Moreover, the proposed development introduces considerable risks to marine species, particularly through the underwater noise produced during construction activities. The use of high-energy hammer piling over an extended period is likely to disturb marine life across extensive areas, with potential effects on species such as dolphins. The predicted disturbance to a significant portion of the local bottlenose dolphin population raises serious concerns. However, the application tends to downplay the significance of these impacts, lacking sufficient supporting evidence.

There is an evident inconsistency within the application, acknowledging the need for licenses to permit harm to European Protected Species while simultaneously describing these impacts as negligible. This contradiction calls into question the credibility of the assessment and raises concerns regarding compliance with the Habitats Regulations, particularly where anticipated harm may require legal authorisation.

Additionally, the assessment does not account for cumulative impacts that arise from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, determining the overall impact on marine ecosystems and socio-economic conditions remains unattainable.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It fails to illustrate that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, ultimately precluding any conclusion that the proposal aligns with sustainable development principles.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed project entails significant onshore infrastructure works that are interconnected with offshore turbine installations. However, the assessment of these onshore elements is materially incomplete, failing to address the full scope of

environmental and socio-economic impacts resulting from what constitutes a single integrated project. By treating the offshore and onshore components separately, the evaluation process has adopted a fragmented approach, which obscures the true scale of the associated effects.

The onshore works involve cabling traversing protected moorland, constructing a substation near Stornoway, and establishing access routes through sensitive landscapes. Critical to this is the excavation across areas of deep peat, particularly within Barvas Moor, a crucial carbon store and ecologically sensitive habitat. The application does not offer a thorough assessment of these impacts, which inhibits a complete understanding of the project's overall environmental footprint.

This lack of comprehensive evaluation prevents proper consideration of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively. However, the disconnect between offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities remain poorly understood. There are significant risks posed to sensitive habitats, including machair systems and peatland environments, which are protected under current policy. The application fails to demonstrate that the impacts on these vital habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, creating a clear evidential gap concerning biodiversity protection.

Moreover, the proposal raises troubling concerns regarding carbon balance. Disturbing peatland releases stored carbon, potentially generating a carbon debt that runs counter to the goals of renewable energy development. The application does not sufficiently address this issue, nor does it show that the overall carbon balance remains advantageous.

Additionally, the routing of infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. There is no evidence provided that the necessary consents or processes have been initiated, casting doubt on 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 at odds with the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be avoided or mitigated further weakens the application.

In conclusion, the division of project components, the absence of a thorough assessment, and the lack of evidence regarding environmental and land use impacts result in an incomplete and unreliable application, hindering lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal includes the installation of permanent red aviation lighting that would create a continuous and intrusive "wall of light" effect visible across long distances along the western horizon. This lighting would fundamentally alter the night-time environment of the West Lewis coastline, which is known for its exceptionally dark skies, an essential aspect of the area's environmental quality, cultural identity, and tourism potential. The absence of an assessment regarding the impact of this lighting on visual amenity, landscape character, and the experiences of residents and visitors is troubling, especially considering the significance of dark skies for the region's identity and the growing field of astro-tourism.

Moreover, the application fails to evaluate the effects of this lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to their phototaxis, which can result in disorientation and heightened collision risks. There is no lighting impact assessment or phototaxis study included in the application, leaving a critical gap in understanding how aviation lighting may impact these species and potentially increase mortality rates.

This oversight is further exacerbated by the dependence on daytime survey data in the ornithological assessment, which does not adequately capture nocturnal activity or the associated risks. Species like Kittiwakes, which forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this risk remains unassessed. The lack of site-specific night-time data contributes to a significant deficiency in understanding the ecological impacts of the proposal.

Without a thorough evaluation of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would be adversely affected. The evidential standard required to rule out adverse effects beyond reasonable scientific doubt cannot be satisfied, thus invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission contradicts the National Planning Framework 4 concerning the safeguarding of natural environments and environmental quality. It also diminishes the overall evaluation of landscape and seascape impacts, given that night-time character is a vital component of the environment.

In summary, the lack of any assessment regarding dark skies and nocturnal wildlife creates a significant evidential gap. The absence of baseline data, impact modelling,

and species-specific analysis results in an incomplete application that cannot support a lawful determination.

TOURISM

The application presents a significant evidential gap by failing to adequately assess tourism impacts, which are vital for the Isle of Lewis economy. Tourism has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and constitutes up to 16% of the island's economy. However, the assessment does not quantify how large-scale offshore infrastructure would affect visitor numbers, behaviour, or the overall economic contribution to the region.

The tourism sector is fundamentally reliant on the natural assets of the area, including its wild coastline, near-pristine landscape, dark skies, and sense of remoteness. While the application acknowledges that 86% of visitors are attracted by scenery, it fails to consider the potential impact of industrialising the seascape and the associated loss of environmental quality on Tourism Gross Value Added and the wider economic resilience of the community. Without such critical analysis, it remains unclear whether the proposed development would yield a net economic benefit or harm an already established and growing sector.

Moreover, the assessment overlooks the crucial role that environmental quality plays in supporting tourism, particularly regarding unspoiled landscapes and dark skies that enhance visitor experiences. The lack of a Dark Skies Assessment further highlights this deficiency, leaving a void in the understanding of impacts on emerging markets, including nature-based tourism and astro-tourism.

In an island community characterised by limited economic diversification, the inadequate evaluation of tourism impacts poses broader implications for employment, local businesses, and overall community sustainability. The absence of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been adequately addressed, contrary to the requirements set out in the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate alignment with the National Planning Framework 4, particularly concerning economic impact and the necessity to illustrate net benefit. It conflicts with strategic objectives that prioritise tourism as a growth sector, and fails to provide enough evidence for the competent authority to properly assess the economic consequences of the proposal.

In summary, the combined failures to quantify tourism impacts, assess environmental

influences on visitor behaviour, and recognise the island's economic dependency culminate in a significant shortfall in the analysis, undermining the robustness of the evaluation of economic effects and leading to the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal embodies a significant failure to meet the standards of sustainable development as defined by statutory duties, national policy, and evidential criteria. This application revives the same core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was highlighted. Now, it is being presented within a more robust policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and the wellbeing of the community.

There are serious shortcomings in the evidential basis for this proposal. It lacks complete and reliable baseline data, employs an undefined design envelope, relies on unspecified mitigation measures, and overlooks crucial impact pathways, such as those affecting nocturnal wildlife, the full extent of 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.

The proposal also demonstrates clear procedural shortcomings. The lack of a compliant Island Communities Impact Assessment is a violation of statutory duty as outlined in the Islands (Scotland) Act 2018, and the omission of the full Social Impact Assessment is a significant gap. These failures impede the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for consideration.

In addition, the proposal stands in direct opposition to 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 due to insufficient tourism impact modelling. The cumulative effects of offshore and onshore components have not been thoroughly assessed, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and could be significant. Evaluations concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also, in some instances, inconsistent. The necessary evidential threshold to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, necessitating the invocation of the precautionary principle and preventing a lawful conclusion regarding the acceptability

of impacts.

Furthermore, 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 negative impacts on tourism represent permanent changes that cannot be mitigated to an acceptable level.

In summary, the application is unfit for determination both procedurally and substantively. The multitude of information deficiencies, paired with policy conflicts and unresolved environmental risks, obstruct the ability to arrive at a lawful, evidence-based decision. The competent authority must either refuse consent based on these grounds or invoke the relevant regulatory provisions to mandate the submission of the missing information.

Thus, it is formally requested that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Additional Comments

As a regular visitor to Lewis and Harris I can hardly credit that this project has been allowed to come to this stage.

Your beautiful islands blighted by infrastructure that is not needed at all.

A place of unrivalled beauty and solitude, a place steeped in fascinating history and a way of life that many crave will be destroyed for no reason at all.

Why would you not look to what's happening on the mainland right now, and ask yourselves, is that what we want, is that what we need?

Member of Public 276

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 under the marine licensing and Environmental Impact Assessment regimes. The objection arises from a thorough review of the Environmental Impact Assessment Report and related documentation, highlighting significant deficiencies in planning, environmental protection, cultural considerations, and procedural integrity. The development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, nearly untouched environment, and rich cultural heritage. Concerns about the proposal's scale, proximity, and design challenge its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a solid evidential basis for lawful determination. There is a notable absence of critical environmental data, with baseline information being both limited and inconsistent, and key elements of the proposal remain undefined. The flexible design framework employed hampers a comprehensive understanding of potential significant effects. Moreover, the proposed mitigation measures have yet to be detailed, leaving their effectiveness unassessable. Consequently, the documentation does not facilitate a complete or informed understanding of environmental, cultural, or community impacts, making the claims of negligible or non-significant effects unsubstantiated by robust evidence.

Substantial conflicts with policy are evident. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and the health and wellbeing of the community. It fails to prove that national standards for protecting biodiversity, climate interests, and environmental integrity can be fulfilled. These discrepancies directly impact the statutory tests necessary for consent and compromise the ability of the competent authority to assess the development's acceptability in policy terms.

The scale of this proposal is unprecedented in this region, featuring large turbines in

close proximity to the shoreline, which raises serious concerns about landscape capacity, visual dominance, and environmental impact. The lack of sufficient information, the reliance on unspecified mitigation measures, and evident policy non-compliance collectively indicate that the application is incomplete and incapable of supporting a lawful determination. Under these circumstances, adherence to the precautionary principle is essential.

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.

ASSESSMENT OF ALTERNATIVES

The proposed application lacks a robust assessment of alternatives, failing to meet the necessary statutory requirements of the Environmental Impact Assessment regime. Instead of providing a structured and reasoned comparison of realistic alternatives based on their environmental effects, the application offers a narrative that recounts the project's evolution. This approach does not adequately demonstrate that less harmful options have been properly identified, assessed, and chosen over more damaging solutions.

There is an absence of transparent, evidence-based comparisons of alternative offshore locations, development scales, or design configurations. Notably, the application does not show that the developer has seriously considered the option of placing turbines further offshore, where visual, ecological, and coastal impacts would likely be lessened. The West Lewis coastline is particularly sensitive, and the crucial role of proximity to shore in determining impact highlights the need for such analysis. Without it, one cannot conclude that the proposed siting represents the least damaging option available.

Furthermore, the deficiencies are evident in the areas of cable routing and landfall assessment, where there is insufficient evidence that alternative routes have been adequately explored to avoid or reduce impacts on sensitive receptors. This includes locations of cultural and spiritual significance, such as Barvas Cemetery. The lack of a clear strategy to avoid impacts and the absence of comparative analysis suggest that mitigation by design has not been considered; instead, the application relies on post-design mitigation measures.

Consequently, the proposal fails to demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This indicates a failure to adhere to the established mitigation hierarchy, which is crucial for the competent authority to ascertain whether less harmful and more suitable alternatives exist. Without a comprehensive assessment of alternatives, it is impossible to conclude that the proposal represents a sustainable or policy-compliant solution.

From a policy standpoint, this shortcoming undermines compliance with National Planning Framework 4, particularly regarding the protection of natural environments, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment constitutes a material omission, leading to the conclusion that the application has not been adequately evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of the marine ecology and protected species is inadequate and fails to provide a reliable understanding of the ecological receptors in the West Lewis coastal environment. This area is biologically active and sensitive, yet the baseline data is lacking, and the methodologies used do not capture the presence, behaviour, and habitat use of species effectively. Consequently, the assessment does not provide a solid evidential basis for evaluating potential impacts.

One significant oversight is the assessment of otters, a European Protected Species. The application does not adequately recognise and assess their active use of the coastal areas for foraging and movement. Without considering their core foraging range and behavioural patterns, the potential impacts of construction disturbance, noise, and increased activity have not been fully evaluated. This shortcoming undermines conclusions regarding the absence of significant effects on this species.

Furthermore, there are deficiencies in the assessment of basking sharks due to reliance on aerial surveys, which introduce considerable detection bias, particularly under Atlantic conditions. This method is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that show these waters are frequently used by the species. The failure to include or properly consider such data leads to an incomplete baseline and diminishes the reliability of the conclusions drawn.

The methodological flaws result in conclusions of negligible or non-significant effects being based on assumptions rather than solid evidence. The lack of adequate baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This leads to uncertainty regarding the actual risks to 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 has not properly identified or assessed protected species. The uncertainty introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt and necessitates the application of the precautionary principle. In light of this, consent cannot be lawfully

granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the development's impact on seabirds is fundamentally flawed. It presents significant gaps in evidence and contains internal inconsistencies that undermine its findings. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application fails to demonstrate adequately that these species will not be adversely affected. Key foraging areas and migratory pathways are situated near the development, yet the assessment does not thoroughly evaluate risks related to displacement, collision, or habitat loss.

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

The assessment lacks sufficient proof that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will be unaffected. The significance of these feeding grounds is inadequately acknowledged, and the reliance on modelling approaches introduces uncertainty, particularly for species like Kittiwakes and Fulmars that are in severe decline. The methodologies used may underestimate mortality rates, especially given the incomplete baseline data and the lack of understanding regarding behavioural responses.

Placing turbines within a recognised migratory corridor adds another layer of risk. This placement effectively creates a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of ongoing mortality in this corridor have not been sufficiently assessed, nor have the potential effects on 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, data gaps, and modelling flaws means that the required standard of beyond reasonable scientific doubt has not been

met. This situation invokes the precautionary principle and renders the conclusion in support of consent unlawful.

These identified deficiencies also 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 not be adversely affected places the proposal in direct conflict with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the cultural heritage along the West Lewis coastline is seriously lacking. It fails to recognise this area as a living cultural landscape, where the environment, language, tradition, and community are deeply intertwined. The application adopts a simplistic view, treating heritage merely as a collection of isolated, unchanging assets, rather than understanding their dynamic social, cultural, and spiritual roles within the community.

A major shortcoming is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are active burial sites and places for spiritual practices, but the assessment categorises them as static features. This approach neglects their ongoing use and meaning, as well as the potential impacts of development on their surroundings. As a result, the evaluation of cultural effects is incomplete and does not reflect their importance in community life.

Moreover, the application overlooks intangible aspects of cultural heritage, including the Gaelic language, local traditions, and the enduring connection between the community and the coastal environment. These aspects are crucial to the area's identity, yet they are absent from the assessment, representing a significant oversight. Without addressing these factors, the true cultural impact of the development remains unclear.

There are additional issues regarding community rights and engagement. The Gaelic-speaking population embodies a unique cultural identity that aligns with characteristics of an Indigenous People. However, no Free, Prior and Informed Consent process has been undertaken. This lack of meaningful engagement undermines the credibility of the assessment and does not reflect the established principles of participation in decisions that affect cultural and environmental interests.

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

From a policy standpoint, these shortcomings place the proposal in direct conflict with 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 acknowledge living cultural practices, signifies a clear deviation from policy standards.

In summary, the lack of assessment of living heritage, intangible cultural value, community rights, and adherence to statutory requirements creates a substantial evidential gap. The cultural impacts of the development have not been thoroughly examined, and the application lacks a solid foundation for assessing the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal's social impacts on the community have not been adequately assessed. The developer produced a Social Impact Assessment, which included discussions with local residents, but the complete report has not been shared. This lack of transparency creates a significant gap in the evidence, preventing both the public and the responsible authorities from understanding the social risks revealed by the developer's research.

Residents are currently facing measurable stress, anxiety, and concern due to the project's size and its proximity to their homes. These effects stem from direct feedback and are not mere speculation. However, the withholding of the full assessment limits the opportunity for thorough examination of the results and restricts the capacity to assess their relevance in the decision-making process.

Furthermore, there is a perception that the proposal threatens community identity and cohesion, with the developer identifying "cultural loss" in their findings. Despite this recognition, these social impacts have not been properly included in the application nor have they been given adequate consideration. The failure to disclose the complete Social Impact Assessment conceals the true human and social consequences of the development.

This lack of transparency also weakens the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health ramifications is crucial

for large developments, especially when they may affect the character and operation of the community. By not providing the complete set of data, the application does not offer a comprehensive evidential basis for weighing the potential benefits against the harms.

From a policy standpoint, the application does not align with the National Planning Framework 4 regarding health and wellbeing. It is essential for development to promote positive health outcomes and avoid negative impacts, yet the existing evidence suggests adverse effects that remain undisclosed. Without the complete assessment, it is impossible to confirm compliance with this policy.

The implications of these procedural shortcomings are considerable. The competent authority is unable to perform a thorough evaluation of socio-economic and health impacts without the complete Social Impact Assessment. This omission represents a significant flaw in the application and fails to satisfy the evidential requirements necessary under the Environmental Impact Assessment guidelines.

Overall, the decision not to disclose the full Social Impact Assessment, combined with clear evidence of negative impacts already felt by the community, leads to an incomplete and unreliable evaluation. This situation hinders a lawful determination and reinforces the view that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline features an open Atlantic horizon, an undeveloped character, and a strong sense of remoteness. The introduction of large-scale turbines near the shoreline would result in a dominant industrial presence, fundamentally transforming this character and causing a permanent alteration to the landscape. The assessment presented fails to represent the scale of this visual change adequately, as the turbines would overshadow views from residential areas, historic sites, and popular coastal locations, adversely impacting visual amenity and eroding the naturalness and remoteness of the area.

Concerns arise regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that the chosen viewpoints may not effectively capture the most sensitive receptors or potential worst-case scenarios, particularly concerning significant cultural heritage sites and valuable landscapes. This raises the possibility that the visual impact has been understated, thereby undermining the assessment's reliability.

Moreover, the relationship between landscape, seascape, and cultural heritage has not been sufficiently explored. Notably, sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape context, which is

visually and spatially linked to the Atlantic horizon. By treating these sites as isolated assets, the assessment neglects their interdependence, leading to an incomplete evaluation of their setting and cultural significance.

The anticipated industrialisation of the seascape would disrupt these relationships, altering how heritage assets are perceived and severing their connections to the natural horizon. This not only represents a visual impact but also inflicts broader cultural and spatial harm that has not been adequately assessed in the application.

From a policy standpoint, the proposal is at odds with National Planning Framework 4, particularly concerning the protection of natural places and historic assets. The extent of change threatens the safeguarding of landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the absence of a rigorous worst-case assessment calls into question any claims of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would ensure their presence is overwhelming and inescapable. Consequently, the resulting change is fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation efforts.

Overall, the assessment is inadequate in accurately portraying the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation, reinforcing the conclusion that the proposal is incompatible with the necessary protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application proposes substantial seabed preparation and installation works in a high-energy Atlantic environment, but it lacks the necessary detail to assess potential environmental effects adequately. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans, and it relies heavily on mitigation and contingency measures that would only be prepared after consent. This approach is particularly concerning given the sensitivity of the West Lewis coastline, which supports clean coastal waters and important habitats that could be adversely affected by sediment disturbance and contamination.

The application acknowledges various risks, including sediment mobilisation and potential chemical or oil spills, yet it provides insufficient information on how these risks will be prevented, controlled, or monitored. Furthermore, there is uncertainty regarding the behaviour and scale of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to gauge the extent, duration, or ecological

effects of such impacts, raising concerns about their implications for marine species and habitats that have already been identified as sensitive.

The lack of detailed emergency response procedures further exacerbates these issues. By postponing contingency planning until after consent is granted, the application hinders an assessment of whether adequate safeguards are in place 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 standpoint, this deferral of critical environmental safeguards conflicts with the stipulations of the Environmental Impact Assessment regime, which requires an assessment of likely significant effects and mitigation measures prior to granting consent. The absence of crucial information means that a lawful determination cannot be made. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the shortcomings of not having defined mitigation measures, the lack of detailed management plans, and the uncertainty regarding potential impacts contribute to a materially deficient assessment. These issues prevent a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The evaluation of the proposal's impacts on fisheries and marine life is inadequate, lacking a comprehensive assessment of both ecological and socio-economic factors. The waters along the West Lewis coast are home to a rich marine ecosystem and support an active fishing industry. However, the application does not convincingly show that these vital habitats and fishing activities will be preserved without significant disruption.

A significant concern is the presumption that fishing activities can be shifted without repercussions. The application does not provide evidence that alternative fishing grounds exist, are accessible, or can sustain the additional pressure resulting from this displacement. This gap is crucial, as it raises the risk of overfishing in other areas, which could have broader economic implications for the local fishing fleet. Without a clear and well-substantiated evaluation, the potential impacts on both fisheries and local livelihoods remain poorly understood.

Moreover, the proposal poses serious risks to marine species, particularly due to underwater noise associated with construction activities. The use of high-energy

hammer piling over an extended duration is expected to create disturbances that could affect a wide range of species, including dolphins. The anticipated disruption to a significant portion of the local bottlenose dolphin population is concerning, yet the application minimizes these impacts without adequate evidence.

Inconsistencies within the application further undermine its credibility. While it acknowledges the need for licences to permit harm to European Protected Species, it simultaneously describes the impacts as negligible. This contradiction raises serious questions regarding compliance with the Habitats Regulations, especially since harm is expected at a level that necessitates legal authorisation.

The assessment does not adequately consider cumulative impacts stemming from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. A thorough evaluation of these combined effects is essential to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate alignment with the National Planning Framework 4 or the National Marine Plan. It does not sufficiently establish that the development can coexist with current marine users or that it can avoid unacceptable impacts on marine biodiversity, thereby preventing any conclusion that the proposal is sustainable.

Overall, the deficiencies in evidence concerning fishing displacement, the underestimation of acoustic impacts, and the presence of internal contradictions 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 current proposal involves significant onshore infrastructure as part of a single integrated project that has been assessed incompletely. The offshore turbines and onshore works are interconnected, yet they have been evaluated separately, leading to a fragmented analysis that conceals the true extent of environmental and socio-economic impacts.

Among the onshore components are cabling that crosses protected moorland, the construction of a substation in proximity to Stornoway, and the necessary access infrastructure through sensitive landscapes. These activities entail excavation in areas of deep peat, particularly within Barvas Moor, which is an important carbon store and an ecologically fragile habitat. The application fails to offer a thorough assessment of these impacts, hindering a comprehensive understanding of the project's overall environmental footprint.

By omitting or postponing the assessment of onshore impacts, the application obstructs an accurate evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all aspects of a project be considered collectively; however, the division between offshore and onshore elements means that the combined effects on peatlands, habitats, and local communities remain unclear.

There are notable risks to delicate habitats, including machair systems and peatland environments, which receive policy protection. The application does not sufficiently demonstrate that impacts on these habitats have been fully evaluated or that suitable avoidance measures have been implemented. This indicates a clear lack of evidence concerning biodiversity protection.

Furthermore, the routing of the infrastructure through active croft land poses potential conflicts with existing land use and legal rights. There is no evidence that the required consents or processes have been commenced, which raises concerns about the deliverability and lawful execution of the project.

From a policy standpoint, the failure to assess the project comprehensively and to demonstrate the safeguarding of peatlands, habitats, and land use interests contradicts the National Marine Plan and National Planning Framework 4. The inability to prove that impacts can be avoided or mitigated further diminishes the credibility of the application.

In summary, the disconnection of project elements, the lack of a comprehensive assessment, and insufficient evidence regarding environmental and land use impacts render this section of the application incomplete and unreliable, obstructing 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 defined by statutory obligations, national policy, and evidential requirements. The issues central to this application echo those that led to the 2008 rejection of the Lewis Wind Power proposal, where the degree of industrialisation was deemed unacceptable. This current proposal is presented under a more robust policy framework that emphasises biodiversity peatland conservation, landscape integrity, and community wellbeing.

The application is lacking a complete and reliable evidential basis for decision-making. There are notable deficiencies in baseline data, the continued utilisation of an undefined design envelope, and an overreliance on unspecified mitigation measures.

Moreover, it fails to address key impact pathways, such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and potential tourism effects. Consequently, the Environmental Impact Assessment is insufficient and does not facilitate a thorough understanding of significant effects or residual impacts.

Procedural inadequacies are also evident. The absence of a compliant Island Communities Impact Assessment is a violation of the statutory duties mandated by the Islands (Scotland) Act 2018, and the non-disclosure of a complete Social Impact Assessment constitutes a critical 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.

Additionally, the proposal stands in direct opposition to the National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural areas, and cultural heritage, nor does it prove that impacts on health and wellbeing are acceptable. Furthermore, it lacks evidence of a net economic benefit, primarily due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been sufficiently assessed, leaving the implications for peatlands, carbon balance, habitats, and crofting land unclear.

There are considerable uncertainties regarding environmental risks that may be significant. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in certain areas. The evidential standard required to rule out adverse effects beyond reasonable scientific doubt has not been achieved, thus invoking the precautionary principle and preventing a lawful conclusion that impacts are acceptable.

The proposal is likely to cause substantial and irreversible alterations to a sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual connections, and the negative impacts on tourism represent permanent changes that cannot be mitigated adequately.

In summary, the application is procedurally and substantively unfit for determination. The extensive information deficiencies, alongside policy conflicts and unresolved environmental risks, obstruct a lawful and evidence-based decision. The competent authority should refuse consent on these grounds or enforce the relevant regulatory provisions to obtain the necessary missing information.

Therefore, it is requested that the application for the Spiorad na Mara Offshore Wind Farm be rejected in its entirety.

Additional Comments

Environmental and marine ecology should be the upmost concern after the damage done by dredging for fish and marine damage caused by that. However not only undersea is a concern, birds are also a concern with windfarms. Concern of environmental damage should now be of utmost concern.

Commercial and financial opportunities for companies not interested or committed to the destruction of the natural environment is unacceptable as we know that dredging sea beds instantly causes damage but takes years to repair if possible.. for a few £ or € or \$ for companies only interested in profit. REALLY is it worth it long term. It is Scotland's shore line that attracts tourists for the communities and country and should not be damaged for any thing detrimental to the future of Scotland's natural beauty.

Member of Public 277

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 objection arises from an examination of the Environmental Impact Assessment Report and associated documentation, revealing significant deficiencies in planning, environmental, cultural, and procedural aspects. The project is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The design, scale, and proximity of the proposal raise serious questions about its alignment with statutory obligations, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis necessary for a lawful decision. Essential environmental data is absent, baseline information is inadequate and inconsistent, and critical elements of the proposal remain undefined. The flexible design framework used does not allow for a clear understanding of potential significant effects, and the reliance on unspecified mitigation measures means their effectiveness cannot be evaluated. Consequently, the documentation fails to provide a complete or informed assessment of the environmental, cultural, or community impacts, with assertions of negligible or non-significant effects lacking robust support.

Substantial policy conflicts are evident, as 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 establish that it can meet national requirements for the protection of biodiversity, climate interests, and environmental integrity. These discrepancies directly affect the statutory tests necessary for consent and compromise the competent authority's ability to determine that the development aligns with policy expectations.

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 repercussions. Collectively, the lack of adequate information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance illustrate that the application is incomplete and incapable of sustaining a lawful determination. In light of these issues, the precautionary principle must be applied.

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 assessment of the proposed development on the west coast of the Isle of Lewis is fundamentally flawed, with substantial gaps in evidence that severely undermine its conclusions. This region supports internationally important seabird populations, many of which are already in decline. However, the application has not demonstrated to the required evidential standard that these species will not face adverse effects. Key foraging areas and migratory pathways, where the turbines are to be sited, have not been adequately assessed for implications regarding displacement, collision risk, or habitat loss.

There is a significant contradiction within the application. The developer claims that there will be no significant adverse effects while also putting forward a Habitats Regulations derogation case, a requirement that arises only when significant harm is anticipated. This inconsistency raises serious questions about the reliability of the assessment and suggests that the conclusions drawn are not supported by solid evidence.

The assessment lacks sufficient evidence to confirm that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is not fully acknowledged, and reliance on modelling approaches introduces uncertainty, particularly for species in severe decline like Kittiwakes and Fulmars. The methodologies utilised may underestimate mortality rates, especially given that baseline data is incomplete and there is insufficient understanding of behavioural responses.

Placing turbines within a recognised migratory corridor presents an additional and significant risk, effectively obstructing a primary flight path used by species migrating between the United Kingdom and Iceland. There is inadequate assessment of the long-term consequences of continued mortality in this corridor, as well as potential impacts on species with comparatively small global populations.

From a regulatory standpoint, the application fails to meet the evidential threshold necessary to assert that there will be no adverse effect on the integrity of protected sites. The combination of contradictory conclusions, data gaps, and limitations in modelling means that the standard of beyond reasonable scientific doubt has not been met. This triggers the precautionary principle, preventing a lawful conclusion in support 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 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 adequate evidence. These failures hinder a thorough evaluation of the impacts and lead to the overall conclusion that the application does not satisfy the statutory requirements necessary for determination.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon and undeveloped nature, contributing to a strong sense of remoteness. The proposed introduction of large-scale turbines near the shoreline would create a dominant industrial presence that fundamentally alters this character. This change would result in a permanent and irreversible transformation of the landscape.

The assessment of visual impacts is significantly lacking, failing to adequately capture the magnitude of visual change anticipated. The scale and proximity of the turbines would overshadow views from residential areas, historic sites, and popular coastal locations, leading to a direct impact on visual amenity and diminishing the qualities of naturalness and remoteness. This crucial aspect of the assessment is not sufficiently articulated, nor is its importance in the context of the sensitive landscape acknowledged.

Concerns also arise regarding the selection and presentation of visual viewpoints within the assessment. Evidence indicates that these viewpoints may not adequately encompass the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This oversight raises the possibility that the extent of visual impact has been understated, thus compromising the reliability of the overall assessment.

Another significant gap is the failure to examine the interconnectedness of landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape, sharing visual and spatial relationships with the Atlantic horizon. The assessment treats these sites as isolated entities, neglecting their interdependence, which results in an incomplete evaluation of impacts on their setting and cultural significance.

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

spatial harm that has not been adequately addressed in the application.

From a policy standpoint, the proposal contravenes National Planning Framework 4, particularly regarding the protection of natural spaces and historic assets. The degree of change proposed is inconsistent with the need 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 compliance.

Moreover, the identified impacts cannot be effectively mitigated. The size, height, and proximity of the turbines would ensure their presence is dominant and inescapable. Consequently, the resulting change is not something that can be reduced to an acceptable level through mitigation efforts.

Collectively, these deficiencies in the assessment lead to an inaccurate representation of the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. Such shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is at odds with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application presents an incomplete assessment of construction and pollution risks, lacking the necessary detail to adequately evaluate potential environmental effects. It involves significant seabed preparation and installation works in a high-energy Atlantic environment, yet there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included. Instead, the application relies on mitigation and contingency measures to be formulated after consent is granted, which obstructs any meaningful appraisal of their sufficiency or efficacy.

This dependence on unspecified future measures raises particular concerns due to the sensitivity of the receiving environment. The West Lewis coastline is characterised by clean coastal waters and critical habitats that are susceptible to sediment disturbance and contamination. While the application identifies risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it fails to provide adequate detail on the preventive, control, or monitoring strategies that will be implemented.

There is considerable uncertainty surrounding the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation activities. Without comprehensive modelling and clearly defined management strategies in place, it is impossible to ascertain the extent, duration, or ecological consequences of these potential impacts. This uncertainty also extends to the possible effects on marine species and habitats that have already been recognised as sensitive in the broader

assessment.

The lack of specific emergency response procedures further exacerbates these issues. By postponing contingency planning until after consent, the application hinders the ability to evaluate whether appropriate safeguards are available for responding to pollution incidents. This introduces procedural risk and undermines the capacity of the competent authority to assess environmental protection measures prior to the decision-making process.

From a regulatory standpoint, the postponement of vital environmental safeguards contradicts the requirements set out by the Environmental Impact Assessment regime. Prior to granting consent, it is imperative that likely significant effects and associated mitigation strategies be thoroughly assessed; the absence of such critical information renders lawful determination impossible. Furthermore, the application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

Overall, the lack of established mitigation measures, insufficient detailed management plans, and the uncertainty regarding potential impacts culminate in a materially deficient assessment. These deficiencies preclude a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry, yet the application does not adequately protect these vital resources from significant disruption. A critical concern is the presumption that fishing activities can simply be moved without repercussions. The proposal lacks evidence regarding the availability and accessibility of alternative fishing grounds capable of absorbing the additional pressure, which raises serious concerns about the potential for overfishing in other areas and the broader economic implications for the local fishing fleet. Without a thorough assessment grounded in evidence, the effects on local fisheries and livelihoods cannot be fully understood.

Moreover, there are considerable risks posed to marine species, particularly due to the underwater noise resulting from construction activities. The use of high-energy hammer piling over extended periods is expected to disturb marine life across significant distances, notably impacting species such as dolphins. The anticipated disturbance to a large portion of the local bottlenose dolphin population is alarming, yet the application significantly downplays these effects without adequate supporting evidence.

The application reveals an inconsistency by acknowledging the necessity for licences to permit harm to European Protected Species while simultaneously asserting that such impacts are negligible. This contradiction undermines the assessment's credibility and raises concerns about compliance with the Habitats Regulations, especially when harm is anticipated to a level that necessitates legal authorisation.

Additionally, the assessment neglects to address cumulative impacts arising from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a comprehensive review of these combined effects, it is impossible to gauge the overall implications for marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4 and the National Marine Plan. It does not illustrate how the proposed development can coexist with existing marine users or avoid adverse effects on marine biodiversity, which precludes any assertion that the proposal aligns with the principles of sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the proposed project is fundamentally flawed, as it fails to consider the entire scope of the integrated project, particularly the interrelation between the offshore turbines and the onshore works. This disjointed approach results in an incomplete understanding of the environmental and socio-economic impacts. The onshore components, which include cabling across protected moorland, the construction of a substation near Stornoway, and necessary access infrastructure, involve excavation through deep peat areas, notably within Barvas Moor. This area is not only a significant carbon store but also an ecologically sensitive habitat. The current application does not offer a comprehensive evaluation of these impacts, leading to a lack of clarity regarding the overall environmental footprint of the project.

Moreover, by omitting or postponing the assessment of onshore impacts, the application hinders a thorough evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all project elements must be examined collectively; however, the distinct treatment of offshore and onshore aspects prevents a full understanding of the combined impacts on peatlands, habitats, and local

communities. There are notable risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application falls short in demonstrating that the effects on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, resulting in a significant evidential gap in biodiversity protection.

Concerns also arise regarding the carbon balance as disturbing peatland may release stored carbon, potentially creating a carbon debt that contradicts renewable energy goals. The application inadequately addresses this critical issue and does not establish that the overall carbon balance remains favourable. Additionally, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The absence of evidence regarding the initiation of necessary consents or processes calls into question the project's deliverability and lawful implementation.

From a policy perspective, the disjointed assessment and the failure to protect peatlands, habitats, and land use interests contradict both the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be mitigated further undermines the credibility of the application. Collectively, the separation of project components, the lack of a comprehensive assessment, and insufficient evidence concerning environmental and land use impacts render this section of the application incomplete and untrustworthy, which obstructs a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are crucial for environmental quality, cultural identity, and tourism. The proposed development introduces permanent red aviation lighting that would create an intrusive "wall of light" visible over long distances, fundamentally changing the night-time environment.

There is no assessment of how this lighting impacts visual amenity, landscape character, or the experiences of residents and visitors. This is particularly concerning considering the significance of dark skies for the area's identity and for emerging sectors such as astro-tourism. The absence of these evaluations represents a serious gap in the landscape and environmental assessment.

Moreover, the application fails to evaluate the effects of artificial lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to such lighting, which can cause disorientation and increase the risk of collisions. The lack of a lighting impact assessment or phototaxis study means that the potential effects on these species and their mortality rates are not considered.

This deficiency is worsened by the use of daytime survey data in the ornithological assessment, which fails to capture nocturnal activity and related risks. Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting. However, this risk has not been evaluated, and the absence of site-specific night-time data leaves a critical gap in understanding ecological impacts.

Without assessing nocturnal effects, it is impossible to determine if protected species or designated sites would suffer adverse effects. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission contradicts the National Planning Framework 4, which emphasises 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 a vital aspect of the environment.

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

TOURISM

The assessment of tourism impacts lacks material depth and does not adequately evaluate the economic and social ramifications for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the region's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness. Although the application notes that 86% of visitors are attracted by the scenery, it fails to provide a quantified evaluation of how large-scale offshore infrastructure would influence visitor numbers, behaviours, or the overall economic contribution.

Tourism has seen considerable growth, rising from £65 million in 2017 to more than £81.5 million, supporting over 1,000 jobs and representing up to 16% of the island's economy. Nevertheless, the application does not assess how the industrialisation of the seascape and the degradation of environmental quality would impact Tourism Gross Value Added or the broader economic resilience of the area. Without this analysis, it is impossible to determine whether the proposed development would offer a net economic benefit or detract from an established and burgeoning sector.

Furthermore, the assessment neglects to consider the significance of environmental quality in bolstering tourism, particularly the value of unspoiled landscapes and dark

skies for visitor experiences, as well as for emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, resulting in a crucial gap in understanding the potential impacts on a recognised and growing segment of the local economy.

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

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

Overall, the inability to quantify tourism impacts, assess the environmental factors influencing visitor behaviours, and recognise the island's economic dependencies creates a significant evidential gap. This hinders a thorough evaluation of economic effects and leads to the conclusion that the application is insufficient.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates significant shortcomings in meeting the essential criteria for sustainable development, as established by statutory duties, national policy, and evidential standards. It mirrors the fundamental issues that resulted in the rejection of the Lewis Wind Power application in 2008, where the unacceptable scale of industrialisation was a central concern. This current application, however, is being assessed within a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

A critical analysis reveals that the application lacks a complete and reliable evidential foundation necessary for a thorough determination. Notable gaps exist in the baseline data, and there is continued reliance on an unspecified design envelope, alongside mitigation measures that have yet to be clearly defined. Furthermore, it neglects to address key impact pathways related to nocturnal wildlife, the full extent of onshore infrastructure, and potential tourism effects. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of the likely significant effects or any residual impacts.

Moreover, the process has encountered clear procedural failings. The lack of a compliant Island Communities Impact Assessment constitutes a violation of statutory obligations under the Islands (Scotland) Act 2018, while the non-disclosure of the full Social Impact Assessment represents a significant omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

In terms of compliance with National Planning Framework 4, the proposal is fundamentally misaligned. It does not adequately demonstrate the protection of biodiversity, natural environments, and cultural heritage. Additionally, it fails to prove that health and wellbeing impacts are acceptable and does not provide evidence of a net economic benefit, primarily due to the lack of tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore components is insufficient, leaving the effects on peatlands, carbon balance, habitats, and crofting land obscured.

Environmental risks associated with the proposal remain uncertain and potentially significant. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and often inconsistent. The necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been achieved, which invokes the precautionary principle and prevents any lawful conclusion that the impacts can be deemed acceptable.

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, disruption of cultural and visual relationships, and the adverse effects on tourism represent enduring changes that cannot be adequately mitigated.

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

Therefore, it is formally requested that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Member of Public 278

Objection To Spiorad na Mara Offshore Wind Farm

References: MD-00011742 & MD-00011743

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. A thorough review of the Environmental Impact Assessment Report and accompanying documentation has revealed 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, an area renowned for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The scale, proximity, and design of the project raise serious concerns about its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a robust evidential basis for a lawful determination. There is a notable absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Furthermore, several key components of the proposal remain undefined. The use of a flexible design framework hinders a clear assessment of potential significant effects, while the reliance on unspecified mitigation measures renders any evaluation of their effectiveness impossible. Consequently, the documentation fails to offer a comprehensive understanding of the environmental, cultural, or community impacts, and assertions regarding negligible or non-significant effects lack adequate support from reliable evidence.

There are evident and serious conflicts with established policy. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural landscapes, cultural heritage, and health and wellbeing. It does not convincingly demonstrate that national mandates to safeguard biodiversity, climate interests, and environmental integrity will be fulfilled. These conflicts are critical to the statutory tests required for consent and undermine the competent authority's ability to determine that the development meets policy standards.

The scale of the proposed development is unprecedented for this area, with large turbines situated alarmingly close to the shoreline, which introduces substantial concerns about landscape capacity, visual dominance, and environmental repercussions. Collectively, the insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and unfit to support a lawful determination. In light of these circumstances, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks comprehensiveness and fails to present a transparent account of the likely environmental impacts of the proposed development. The implementation of a flexible Project Design Envelope, which lacks definitive turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This ambiguity obstructs the reliable application of a worst-case scenario analysis, thereby compromising the integrity of the assessment. As a result, the projected impacts may not accurately represent those of the development that is ultimately realised, which hampers both public understanding and the ability of the competent authority to gauge the true extent of environmental effects.

Moreover, the application is predicated upon mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. The request for consent under these conditions implies that environmental issues will be rectified subsequently, which diminishes the opportunity for a thorough evaluation of efficacy and assessment of residual impacts. This postponement of crucial information to post-consent phases is procedurally inappropriate and contradicts the fundamental objectives of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation measures be thoroughly established prior to the decision-making process.

Significant evidential shortcomings are also present, including inadequacies in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. Such deficiencies create uncertainty regarding the magnitude and significance of potential impacts, especially where findings suggest negligible or non-significant effects without adequate supporting data. The lack of comprehensive information obstructs a clear understanding of cumulative and worst-case scenarios, introducing a level of scientific uncertainty that is incompatible with statutory obligations.

Consequently, the application fails to satisfy the evidential requirements set forth under the Habitats Regulations, which necessitate the exclusion of adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with the National Planning Framework 4, particularly in areas concerning biodiversity protection and environmental integrity, as it remains unproven that impacts have been thoroughly evaluated or that suitable safeguards are in place.

In summary, the combination of an ill-defined design envelope, lack of specified

mitigation measures, and deficiencies in baseline data results in an Environmental Impact Assessment Report that is both unreliable and incomplete. These shortcomings preclude a lawful and thorough assessment of environmental impacts, leaving the competent authority unable to make an informed determination based on the information presented.

ASSESSMENT OF ALTERNATIVES

The application does not adequately assess alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. It lacks a structured comparison of realistic alternatives based on their environmental effects and instead provides a narrative of the project's evolution. This approach does not show that less harmful options have been properly identified or assessed in preference to more damaging ones.

There is no evidence-based comparison of alternative offshore locations, development scales, or design configurations. The application does not demonstrate that the developer considered placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be reduced. Given the sensitivity of the West Lewis coastline and the significance of proximity to shore in determining impact, the lack of such analysis undermines any conclusion that the proposed siting is the least damaging option.

The issues also extend to cable routing and landfall assessment, where there is insufficient evidence that alternative routes have been thoroughly explored to avoid or lessen impacts on sensitive receptors, including culturally significant areas such as Barvas Cemetery. The absence of a clear avoidance strategy and a lack of comparative analysis suggest that mitigation by design has not been applied, leading to reliance on post-design mitigation measures instead.

Consequently, the application does not demonstrate that environmental harm has been minimised through effective site selection, layout, and routing of infrastructure. This reflects a failure to adhere to the established mitigation hierarchy and inhibits the competent authority from determining whether less harmful and more suitable alternatives are available. Without a thorough assessment of alternatives, it cannot be concluded that the proposal is sustainable or compliant with policy requirements.

From a policy standpoint, this shortcoming undermines adherence to National Planning Framework 4, especially regarding the protection of natural areas, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a significant omission that leads to the overall conclusion that the application has not been sufficiently evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species within the West Lewis coastal environment is fundamentally flawed and fails to deliver a comprehensive understanding of the ecological receptors in this sensitive marine area. This system is biologically vibrant, yet the baseline data remains inadequate, and the methodologies used are insufficient for accurately capturing species presence, behaviour, and habitat use. Consequently, the assessment lacks a solid evidential foundation for evaluating potential impacts.

A significant oversight pertains to otters, classified as a European Protected Species. The application neglects to adequately acknowledge and assess their active utilisation of coastal regions for foraging and movement. This omission in evaluating their core foraging range and behavioural patterns results in an incomplete understanding of how construction disturbance, noise, and increased activity might affect them. This gap undermines any assertions regarding the absence of significant effects on this species.

Further issues emerge in the assessment of basking sharks, where dependence on aerial surveys introduces substantial detection bias, particularly under Atlantic conditions. Such an approach likely leads to an underestimation of their presence, especially when juxtaposed with established land-based observations that indicate frequent use of these waters. The failure to integrate or appropriately consider this data leads to an incomplete baseline and diminishes the reliability of the conclusions drawn.

The methodological shortcomings mean that conclusions regarding negligible or non-significant effects rest on assumptions rather than solid evidence. Furthermore, the lack of sufficient baseline data inhibits a meaningful examination of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. This introduces uncertainty about the actual level of risk faced by marine species and habitats.

From a regulatory standpoint, the application does not align with the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been accurately identified or assessed. The uncertainty generated prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. In light of these concerns, granting consent would not be lawful.

In summary, the combination of inadequate baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These deficiencies

hinder a thorough evaluation of impacts on marine ecology and protected species, reinforcing the conclusion that the application lacks a solid evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents a fundamentally unreliable ornithological assessment, marked by significant gaps in evidence and contradictions that call its conclusions into question. It is situated within key foraging areas and migratory pathways on the west coast of the Isle of Lewis, where internationally important seabird populations, already in decline, reside. Despite this, the assessment fails to demonstrate convincingly that these species will not suffer adverse effects. The implications of displacement, collision risk, or habitat loss have not been adequately evaluated.

There is a crucial inconsistency within the application itself. While the developer concludes that there are no significant adverse effects, they simultaneously propose a Habitats Regulations derogation case, which only arises when significant harm is anticipated. This contradiction further undermines the reliability of the assessment and indicates that the conclusions drawn lack support from the underlying evidence.

Moreover, the assessment does not adequately substantiate 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 fully considered, and the reliance on modelling methodologies introduces substantial uncertainty, particularly concerning species in severe decline like Kittiwakes and Fulmars. It is likely that mortality rates are underestimated due to incomplete baseline data and an insufficient understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor poses an additional significant risk, effectively creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term effects of sustained mortality within this corridor are not adequately assessed, raising concerns for species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to ascertain 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 situation invokes the precautionary principle and precludes a lawful conclusion in support of consent.

Additionally, the identified deficiencies contravene 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 creates a direct conflict with national policy.

In summary, the assessment is rendered unreliable by internal inconsistencies, methodological weaknesses, and a lack of sufficient evidence. These deficiencies hinder a robust evaluation of potential impacts and support the conclusion that the application fails to meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment fails to address the cultural heritage and community identity of the West Lewis coastline, which is a dynamic cultural landscape interwoven with environment, language, tradition, and community. It adopts a narrow perspective, viewing heritage merely as disconnected, unchanging assets rather than recognising their vital ongoing social, cultural, and spiritual roles within the community.

Culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are not accurately represented in the assessment. These locations are active burial sites and centres of spiritual practice; however, they are wrongly categorised as static features. This mischaracterisation ignores their continued significance, the impact of development on their settings, and leads to an inadequate evaluation of the cultural implications.

Moreover, the assessment neglects intangible aspects of cultural heritage, including the Gaelic language, traditional practices, and the deep-rooted relationship between the community and its coastal environment. These elements are crucial to the area's identity, yet they are entirely omitted from the assessment, which represents a serious oversight. Without these considerations, the true cultural impact of the development remains unexamined.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking community, recognised as Indigenous People, has not been afforded Free, Prior and Informed Consent in this process. The lack of meaningful engagement calls into question the validity of the assessment and disregards essential principles of participation in matters affecting cultural and environmental interests.

Additionally, there is a critical procedural failure due to the absence of a compliant Island Communities Impact Assessment, mandated by the Islands (Scotland) Act 2018. This omission 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 deficiencies directly contradict National Planning Framework 4, especially regarding the preservation of historic assets and places. The disregard for both tangible and intangible heritage, along with the failure to recognise living cultural practices, illustrates a significant departure from established policy requirements.

In summary, the inadequate assessment of living heritage, intangible cultural values, community rights, and compliance with statutory obligations leads to a substantial evidential gap. The application does not sufficiently evaluate the cultural impacts of the development, thus failing to provide a clear understanding of its true cultural costs.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The full report of the Social Impact Assessment commissioned by the developer has not been published, creating a significant evidential gap. This lack of transparency means that both the public and the competent authority cannot grasp the complete scope of social risks identified through the developer's own research. Available summaries suggest that residents are facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement with the community and are therefore based on actual experiences rather than speculation. However, without access to the full assessment, proper scrutiny of these findings is hindered, limiting the ability to evaluate their importance in the decision-making process.

Furthermore, the proposal is seen as a threat to community identity and cohesion, with the developer's own findings highlighting concerns about "cultural loss." Despite this, such impacts have not been fully considered in the main application or given adequate weight. The withholding of the complete Social Impact Assessment obscures the true human and social costs of the development.

This deficiency in transparency undermines 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 may be at stake. By failing to provide the complete dataset, the application lacks a solid evidential basis for balancing benefits against harm.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 regarding health and wellbeing. Development is expected to promote positive health outcomes and prevent harm, yet the evidence available points to existing adverse effects that have not been fully revealed. Without the complete assessment, the application cannot prove compliance with this policy.

The procedural implications are serious. The competent authority cannot carry out a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a significant omission within the application and fails to meet the evidential requirements of the Environmental Impact Assessment regime.

Overall, the non-disclosure of the complete Social Impact Assessment, along with evidence of existing negative impacts, renders the assessment incomplete and unreliable. This situation obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment regarding seascape, landscape, and visual impacts is fundamentally flawed, lacking an adequate representation of the scale of change and the sensitivity of the surrounding environment. The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and significant sense of remoteness. The close proximity of large-scale turbines to the shoreline would introduce a continuous and overwhelming industrial presence, fundamentally altering this character and resulting in a permanent and irreversible change to the landscape.

Moreover, the application fails to represent the magnitude of the anticipated visual alterations. The height and closeness of the turbines would overshadow views from residential areas, historic sites, and frequently visited coastal locations. This would detrimentally affect visual amenity and undermine the essential qualities of naturalness and remoteness. The assessment does not adequately convey this impact or its importance within the context of such a sensitive landscape.

Concerns arise concerning the methodology employed in selecting and presenting visual viewpoints. There is evidence indicating that these viewpoints may not adequately reflect the most sensitive receptors or the most adverse scenarios, particularly in relation to significant cultural heritage sites and high-value landscapes. This raises the possibility that the extent of visual impact has been underestimated, thereby compromising the assessment's reliability.

Additionally, there is a notable shortcoming in the assessment's failure to acknowledge the interconnectedness of seascape, landscape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these as separate entities rather than understanding their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 concerning the safeguarding of natural environments and historic assets. The proposed scale of change is incompatible with the need to protect landscape character, visual amenity, and the settings of culturally significant locations. The lack of a comprehensive worst-case assessment further weakens any assertion of policy compliance.

It is evident that the identified impacts cannot be successfully mitigated. Given the size, height, and proximity of the turbines, their presence would be overpowering and inescapable. Consequently, the resulting transformation is not merely capable of being reduced to an acceptable level through mitigation; it is fundamentally and permanently altering the landscape.

Overall, the assessment fails to accurately depict the extent of impact, the sensitivity of the environment, and the interconnected relationships between landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is not compatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal fails to provide a comprehensive assessment of construction and pollution risks, making it impossible to evaluate the likely environmental effects accurately. It involves significant seabed preparation and installation works in a high-energy Atlantic environment, yet lacks fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on undefined mitigation and contingency measures that would be prepared after consent, which undermines any meaningful assessment of their adequacy or effectiveness.

This lack of clarity is particularly alarming given the sensitive nature of the receiving environment along the West Lewis coastline, which is home to clean coastal waters and vital habitats susceptible to sediment disturbance and contamination. While the application acknowledges potential risks such as sediment mobilisation and the possibility of chemical or oil spills, it does not adequately detail how these incidents will be prevented, controlled, or monitored.

Moreover, there is uncertainty surrounding the scale and behaviour of sediment plumes resulting from the seabed disturbance and cable installation. Without robust modelling

and clearly articulated management strategies, it is impossible to ascertain the extent, duration, or ecological ramifications of these impacts. This uncertainty also affects the potential consequences for marine species and habitats already recognised as sensitive in the broader assessment.

The absence of detailed emergency response procedures only exacerbates these issues. By delaying contingency planning until after consent, the application obstructs a proper evaluation of whether suitable safeguards are in place to address pollution events. This introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures before making a decision.

From a regulatory standpoint, the postponement of crucial environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be evaluated prior to consent, and without such information, a lawful determination is unattainable. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the combination of undefined mitigation measures, inadequate management plans, and uncertainty about potential impacts makes the assessment materially deficient. These deficiencies preclude a thorough evaluation of construction and pollution risks and further emphasise that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents an inadequate assessment of fisheries and marine life, failing to provide 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, yet the proposal does not convincingly demonstrate that these vital habitats and activities can be preserved without significant disruption.

A critical concern is the erroneous assumption that fishing activities can be displaced without negative consequences. The application lacks any evidence to support the availability of alternative fishing grounds that are both accessible and capable of handling additional pressure. This significant oversight raises the risk of overfishing in other areas, potentially leading to broader economic repercussions for the local fishing fleet. An absence of a clear, evidence-based assessment leaves the impacts on fisheries and local livelihoods poorly understood.

Moreover, the proposal poses considerable risks to marine species, particularly through the underwater noise generated during construction. The use of high-energy hammer piling over extended periods is expected to disturb marine life over large areas,

including species like dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises serious alarms, yet the application diminishes the seriousness of these effects without adequate supporting evidence.

There exists a glaring inconsistency within the application, as it acknowledges the necessity for licences to permit harm to European Protected Species while simultaneously declaring such impacts to be negligible. This contradiction undermines the assessment's credibility and raises questions about compliance with the Habitats Regulations, especially where anticipated harm necessitates legal approval.

Additionally, the assessment neglects to consider the cumulative impacts stemming from various pressures, such as habitat disturbance, noise, and fishing displacement. 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 alignment with National Planning Framework 4 or the National Marine Plan. It does not establish that the proposed development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity, hindering any determination of the proposal as sustainable development.

In summary, the combination of insufficient evidence regarding fishing displacement, underestimation of acoustic impacts, and internal inconsistencies renders the assessment incomplete and unreliable. These shortcomings impede a thorough evaluation of the proposal's impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal involves significant onshore infrastructure, including cabling across protected moorland, the construction of a substation near Stornoway, and access infrastructure through sensitive landscapes. However, the assessment of these onshore elements is materially incomplete and fails to consider the full extent of impacts arising from what constitutes a single integrated project. The offshore turbines and onshore works are intrinsically linked but are assessed separately, leading to a fragmented approach that obscures the true scale of environmental and socio-economic effects.

The application does not provide a comprehensive assessment of the impacts associated with excavation across areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and ecologically sensitive habitat. By excluding or deferring the assessment of onshore impacts, the application prevents a thorough evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project be considered collectively;

however, the separation of offshore and onshore elements results in a failure to fully understand the combined impacts on peatlands, habitats, and communities.

Moreover, there are substantial risks 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 thoroughly assessed or that appropriate avoidance measures have been implemented, creating a clear evidential gap concerning biodiversity protection. Additionally, the routing of infrastructure through active croft land introduces potential conflicts with existing land use and legal rights, as the application lacks evidence that the necessary consents or processes have been initiated. This raises questions regarding the deliverability and lawful implementation of the project.

From a policy standpoint, the failure to evaluate the project as a whole and to demonstrate protection of peatlands, habitats, and land use interests conflicts with the National Marine Plan and National Planning Framework 4. The inability to establish that impacts can be avoided or mitigated further undermines the application. Collectively, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts render this part of the application incomplete and unreliable, thereby preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism value. However, the Environmental Impact Assessment fails to consider the assessment of dark skies and nocturnal wildlife, representing a significant omission. The proposed installation of permanent red aviation lighting would be visible over long distances, leading to a continuous and intrusive “wall of light” effect across the western horizon. This change would fundamentally disrupt the night-time environment.

Moreover, the application neglects to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. Given the significance of dark skies to the region's identity and its emerging tourism sectors, such as astro-tourism, this omission is particularly concerning. The lack of consideration for these effects leaves a clear gap in the landscape and environmental assessment.

More importantly, there has been no evaluation of the effects on nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are notably sensitive to artificial lighting, which can cause disorientation and increase

the risk of collisions. The application does not provide any lighting impact assessment or phototaxis study, failing to address how the proposed aviation lighting may influence these species or raise mortality rates.

The situation is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not account for nocturnal activity or the associated risks. Additionally, 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 evaluated. The absence of site-specific night-time data creates a crucial gap in understanding the ecological impacts.

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

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

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

TOURISM

The assessment of tourism impacts presented in the application is inadequate, as it neglects to evaluate the economic and social repercussions for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the region's wild coastline, nearly untouched landscapes, dark skies, and sense of remoteness. Although it is noted that 86% of visitors are attracted by the scenery, there is no quantified analysis of how large-scale offshore infrastructure could influence visitor numbers, behaviour, or the overall economic contribution.

The growth of tourism in the area has been notable, with revenues increasing from £65 million in 2017 to more than £81.5 million, thus supporting over 1,000 jobs and representing up to 16% of the island's economy. However, the application fails to model the potential impacts of industrialising the seascape and the associated loss of environmental quality on Tourism Gross Value Added or the broader economic

resilience of the area. Without this analysis, it remains uncertain whether the development would yield a net economic benefit or jeopardise an established and expanding sector.

The significance of environmental quality in enhancing tourism, particularly the value of unspoiled landscapes and dark skies for visitor experiences and emerging sectors like nature-based tourism and astro-tourism, is also overlooked. The absence of a Dark Skies Assessment exacerbates this shortcoming, creating a considerable gap in understanding the impact on a recognised and growing component of the local economy.

Considering the limited economic diversification within the island community, the neglect of tourism impact assessments carries broader implications for employment, local enterprises, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been addressed as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not substantiate its compliance with National Planning Framework 4, especially regarding economic impact and the necessity to demonstrate net benefits. It also contradicts strategic goals that designate tourism as a priority growth sector and fails to furnish adequate evidence for the competent authority to evaluate the economic ramifications of the proposal.

In summary, the combination of unquantified tourism impacts, a lack of assessment regarding environmental influences on visitor behaviour, and the omission of the island's economic dependencies results in a significant evidential gap. This absence hampers a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal presents a significant inadequacy in fulfilling the criteria for sustainable development, particularly when evaluated against statutory obligations, national policies, and required evidential standards. It echoes the principal concerns that led to the rejection of the Lewis Wind Power proposal in 2008, which was deemed excessively industrialised. This current application emerges under a policy framework that has been strengthened, placing enhanced emphasis biodiversity, peatland preservation, landscape integrity, and community welfare.

A critical issue with the application lies in its failure to provide a comprehensive and dependable evidential foundation for decision-making. There are notable deficiencies in baseline data, the ongoing use of a vague design envelope, an over-reliance on

unspecified mitigation measures, and the exclusion of important impact pathways affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is inadequate and does not facilitate a thorough understanding of the likely significant effects or residual impacts.

There are evident procedural shortcomings as well. The lack of a compliant Island Communities Impact Assessment constitutes a violation of statutory duty under the Islands (Scotland) Act 2018, while the failure to provide a complete Social Impact Assessment represents a significant omission. These shortcomings hinder the competent authority's ability to evaluate effects on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

This proposal stands in direct opposition to the principles outlined in National Planning Framework 4. It fails to demonstrate the necessary protection of biodiversity, natural habitats, and cultural heritage, does not sufficiently address health and wellbeing impacts, and lacks evidence of a net economic benefit, largely due to the absence of tourism impact analysis. Furthermore, the cumulative impact of both offshore and onshore components has not been adequately assessed, thus obscuring potential effects on peatlands, carbon balance, habitats, and agricultural land.

The environmental risks associated with this proposal remain ambiguous and potentially significant. Assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and, in certain areas, contradictory. The evidential standard required to dismiss adverse effects beyond reasonable scientific doubt has not been satisfied, thereby invoking the precautionary principle and obstructing a lawful determination that impacts are acceptable.

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

In summary, the application is procedurally and substantively unfit for determination. The extent of information shortfalls, alongside conflicts with policy and unresolved environmental risks, obstructs a lawful and evidence-based decision-making process. Therefore, the competent authority is urged to refuse consent based on these grounds or to apply the relevant regulatory provisions to mandate the submission of the necessary missing information.

A formal request is hereby made for the rejection of the Spiorad na Mara Offshore Wind Farm application in its entirety.

Member of Public 279

Objection To Spiorad na Mara Offshore Wind Farm

References: MD-00011742 & MD-00011743

Dear Sir/Madam

This letter formally objects to the application for the Spiorad na Mara Offshore Wind Farm, submitted under marine licensing and Environmental Impact Assessment frameworks. A review of the Environmental Impact Assessment Report and accompanying documents reveals significant deficiencies across planning, environmental, cultural, and procedural aspects. The development site is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, relatively unspoiled environment, and strong cultural heritage. Concerns regarding the scale, proximity, and design of the proposal challenge its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks an adequate evidential basis necessary for a lawful determination. There is a notable absence of critical environmental data, with baseline information being limited and inconsistent. Key elements of the proposal remain unclear. The flexible design framework employed hinders a comprehensive understanding of the likely significant effects, while the reliance on unspecified mitigation measures makes it impossible to evaluate their potential effectiveness. Consequently, the documentation fails to provide a thorough understanding of the environmental, cultural, or community impacts, with assertions of negligible or non-significant effects lacking robust evidence.

There are evident and substantial conflicts with existing policy. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly regarding biodiversity, natural spaces, cultural heritage, and health and wellbeing. It does not sufficiently demonstrate compliance with national obligations to safeguard biodiversity, climate considerations, and environmental integrity. These discrepancies directly impact the statutory tests necessary for consent, undermining the competent authority's ability to assess the development's acceptability from a policy perspective.

The unprecedented scale of the proposal introduces major concerns related to landscape capacity, visual dominance, and environmental ramifications, particularly with the large turbines located in close proximity to the shoreline. The combination of insufficient information, reliance on undefined mitigation strategies, evidential

shortcomings, 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 is warranted.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents several critical deficiencies that undermine its reliability and transparency regarding the environmental effects of the proposal. A significant concern arises from the application of a flexible Project Design Envelope, which lacks specific commitments to turbine dimensions, layouts, or configurations. This ambiguity leads to considerable uncertainty and hampers the ability to apply a worst-case scenario consistently, thus compromising the integrity of the assessment. Consequently, the impacts outlined may not accurately represent those of the final development, leaving both the public and the competent authority without a clear understanding of the actual environmental effects.

Furthermore, the application is heavily contingent on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. By seeking consent on the premise that any potential environmental harm will be rectified later, the assessment fails to provide a meaningful evaluation of these measures' effectiveness or an accurate appraisal of residual impacts. This postponement of essential information until after consent is granted is procedurally unacceptable and contradicts the core objectives of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation strategies be clearly established before making a determination.

Moreover, the report suffers from substantial evidential gaps, including insufficient baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This raises doubts 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 comprehensive information obstructs a clear understanding of cumulative and worst-case impacts, fostering scientific uncertainty that cannot be reconciled with statutory requirements.

As a result, the application does not satisfy the evidential threshold mandated by the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate alignment with National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it has not been shown 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 strategies, and the presence of significant gaps in baseline data collectively render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings impede a lawful and robust evaluation of the environmental effects, meaning that the competent authority is not adequately positioned to assess the application based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally flawed and fails to deliver a complete and dependable understanding of the ecological receptors present in the West Lewis coastal environment. This marine system is sensitive and biologically active, yet the existing baseline data is insufficient, and the methodologies employed do not effectively capture species presence, behaviour, and habitat use. Consequently, the evaluation does not provide a solid evidential basis for understanding potential impacts.

One significant oversight is the treatment of otters, which are a European Protected Species. The application does not adequately recognise or assess their active usage of coastal areas for foraging and movement. The failure to consider their core foraging range and behavioural patterns means the potential effects of construction disturbance, noise, and increased activity have not been thoroughly assessed. This lack of assessment undermines any conclusions regarding the absence of significant effects on this species.

The assessment of basking sharks also displays notable deficiencies, as the reliance on aerial surveys introduces a significant 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 frequent usage of these waters. The failure to include or appropriately consider such data leads to an incomplete baseline and diminishes the reliability of the conclusions reached.

These methodological shortcomings imply that the conclusions of negligible or non-significant effects are based more on assumptions than on rigorous evidence. The lack of adequate baseline data prevents a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty regarding the true scale of risk posed to marine species and their habitats.

From a regulatory standpoint, the application does not fulfil the requirements set 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 hinders the ability to exclude adverse effects beyond reasonable scientific doubt, invoking the precautionary principle. In light of these circumstances, it is clear that consent cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These inadequacies obstruct a thorough evaluation of impacts on marine ecology and protected species and contribute to the overall finding that the application does not possess a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents significant shortcomings that undermine its reliability and the conclusions drawn within it. A considerable inconsistency exists, as the developer claims there will be no significant adverse effects while simultaneously pursuing a derogation case under the Habitats Regulations, which is only necessary when significant harm is anticipated. This contradiction raises doubts about the validity of the assessment, suggesting that the findings are not substantiated by the available evidence.

The ornithological assessment is notably flawed, containing substantial gaps in evidence and internal inconsistencies. 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 that these species will not be adversely affected. Key foraging areas and migratory pathways are located in proximity to the proposed development, yet the assessment does not thoroughly consider the implications of displacement, collision risk, or habitat loss.

In relation to protected sites, the assessment does not convincingly show that seabird species associated with areas such as the Lewis Peatlands and St Kilda will remain unaffected. The significance of these feeding grounds is not fully recognised, and the reliance on modelling approaches introduces a degree of uncertainty, particularly for species experiencing severe declines, like Kittiwakes and Fulmars. The methods employed are likely to underestimate mortality, particularly when baseline data is inadequate and behavioural responses are not entirely understood.

Moreover, the placement of turbines within a known migratory corridor poses an additional, substantial risk. This effectively creates a barrier in a primary flight path used by species travelling between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term consequences 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 needed to affirm that there will be no adverse effect on the integrity of protected sites. The combination of conflicting conclusions, data gaps, and limitations in modelling means the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and precludes a lawful conclusion in favour of consent.

The identified deficiencies also indicate a failure to adhere to National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely impacted places the proposal at odds with national policy.

In summary, these weaknesses in methodology, evidence, and internal consistency render the assessment unreliable. These flaws hinder a thorough evaluation of impacts and contribute to the overall conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment concerning community identity and cultural heritage is profoundly inadequate, failing to appreciate the West Lewis coastline as a vibrant cultural landscape where the environment, language, tradition, and community are deeply intertwined. The application adopts an overly simplistic approach, treating heritage as a collection of isolated, static elements rather than recognising their ongoing social, cultural, and spiritual significance within the community.

A major shortcoming lies in the handling of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active places for burial and spiritual practice, yet the assessment reduces them to static features, neglecting their continued use, importance, and the influence of development on their surroundings. This mischaracterisation leads to an incomplete assessment of cultural effects and overlooks their vital role in community life.

Additionally, the application does not adequately address intangible cultural heritage, including the Gaelic language, traditions, and the community's enduring relationship with the coastal environment. These components are crucial to the area's identity but are entirely overlooked in the assessment, representing a significant gap. Without recognising these aspects, the true cultural impact of the development remains obscured.

Moreover, there are significant concerns regarding community rights and engagement.

The Gaelic-speaking population has a distinct cultural identity acknowledged as that 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 regarding participation in decisions that affect cultural and environmental interests.

A notable procedural failure is the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. This lack of assessment means that the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic implications for the island community. This omission alone renders a lawful determination unachievable.

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

Collectively, the oversight in assessing living heritage, intangible cultural value, community rights, and compliance with statutory obligations leads to a significant evidential gap. The cultural impacts of the development have not been thoroughly evaluated, and the application does not offer an adequate foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's approach to assessing social impacts, health, and wellbeing is inadequate and lacks necessary transparency. Although a Social Impact Assessment was commissioned, which included focus groups with local residents, the complete report remains unpublished. This creates a notable gap in evidence and restricts both public insight and the competent authority's understanding of the social risks identified by the developer's own research.

Residents are reportedly experiencing increased levels of stress, anxiety, and concern due to the scale and proximity of the proposed development. These effects arise from direct community engagement and are not based on speculation. However, without access to the full assessment, proper scrutiny of these findings is impossible, limiting the ability to evaluate their significance in the decision-making process.

Moreover, the proposal is viewed as a potential threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. Despite this recognition, such impacts have not been adequately reflected in the main application or given

sufficient consideration. The lack of a complete Social Impact Assessment obscures the genuine human and social costs associated with the development.

This absence of transparency is detrimental to the Environmental Impact Assessment process. Understanding the full range of social, economic, and health impacts is critical for developments of this magnitude, especially when the character and functioning of the community may be at stake. By failing to provide the complete data set, the application does not offer a comprehensive evidential basis to weigh benefits against harm.

From a policy standpoint, the application does not align with 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 significant adverse effects that have not been fully disclosed. Without the complete assessment, it is not possible to establish compliance with this policy.

The implications of these procedural shortcomings are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This omission constitutes a significant flaw in the application and a failure to meet the evidential standards required by the Environmental Impact Assessment framework.

Overall, the failure to disclose the complete Social Impact Assessment, along with evidence of current negative impacts, renders the assessment both incomplete and unreliable. This situation hinders a lawful determination and reinforces the assertion that the application is not backed by sufficient 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.

CONSTRUCTION AND POLLUTION RISKS

The proposal presents significant concerns regarding the incomplete assessment of construction and pollution risks, which lacks the necessary detail to evaluate potential environmental impacts. It involves extensive seabed preparation and installation activities in the high-energy Atlantic environment, yet there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans provided. Instead, the application depends on mitigation and contingency measures that are to be developed after consent, which hinders any meaningful evaluation of their sufficiency or effectiveness.

This reliance on unspecified future measures is particularly troubling due to the sensitivity of the surrounding environment. The West Lewis coastline is home to clean

coastal waters and vital habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and possible chemical or oil spills, it fails to outline adequate strategies for their prevention, control, or monitoring.

Moreover, there is uncertainty regarding the scale 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 repercussions of these impacts. This uncertainty also extends to possible effects on marine species and habitats identified as sensitive in the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application obstructs the ability to evaluate whether suitable safeguards are established to address pollution incidents. This introduces procedural risks and diminishes the competent authority's capacity to assess environmental protection measures at the decision-making stage.

From a regulatory viewpoint, the postponement of essential environmental safeguards contradicts the requirements set out by the Environmental Impact Assessment regime. Significant effects and necessary mitigations must be evaluated prior to consent, and without this crucial information, a lawful determination cannot be achieved. Additionally, the application does not demonstrate adherence to policy requirements pertaining to environmental protection and water quality.

In summary, the lack of clearly defined mitigation measures, the absence of thorough management plans, and the uncertainty regarding potential impacts lead to a materially deficient assessment. These deficiencies hinder a rigorous evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry. However, the application fails to provide a sufficient assessment of fisheries and marine life, lacking a robust evaluation of the ecological and socio-economic impacts. There is a concerning assumption that fishing activity can be displaced without any consequences. Notably, the application does not present evidence indicating that alternative fishing grounds are available, accessible, or capable of bearing additional pressure. This lack of information is critical, as such displacement could lead to overfishing in other areas, potentially impacting the local fishing fleet's economic stability. Without a detailed and evidence-based assessment, the ramifications for fisheries and local livelihoods remain unclear.

Moreover, the proposal poses significant risks to marine species, especially due to the underwater noise anticipated from construction activities. The use of high-energy hammer piling over prolonged periods is expected to create disturbances across vast distances, adversely affecting species like dolphins. The anticipated disruption to a considerable portion of the local bottlenose dolphin population is alarming, yet the application minimises these effects without providing adequate supporting evidence.

Furthermore, there is a clear contradiction within the application that acknowledges the need for licences to allow harm to European Protected Species while simultaneously asserting that the impacts are negligible. This inconsistency casts doubt on the credibility of the assessment and raises serious questions about adherence to the Habitats Regulations, particularly concerning anticipated harm that requires legal authorisation.

The assessment neglects to account for cumulative impacts from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, determining the overall impact on marine ecosystems and socio-economic conditions remains impossible.

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4 or the National Marine Plan. It fails to illustrate how the development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity, thus undermining any assertion that the proposal constitutes sustainable development.

In summary, the deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and internal contradictions render the assessment inadequate and unreliable. These shortcomings hinder a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed project presents significant concerns regarding its assessment and the implications of its onshore infrastructure, which are inadequately addressed in the application. The offshore turbines and onshore works are interconnected, yet the assessment treats them as separate entities. This fragmented analysis obscures the true scale of environmental and socio-economic impacts, failing to recognise the project's full extent.

Critical onshore components include the installation of cabling across protected moorland and the construction of a substation near Stornoway, as well as the

necessary access infrastructure through sensitive landscapes. Notably, this construction entails excavation in areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and an ecologically sensitive habitat. The lack of a thorough assessment of these impacts hinders the understanding of the project's overall environmental footprint.

The application also falls short in evaluating cumulative effects due to the exclusion or deferral of onshore impact assessments. The Environmental Impact Assessment process mandates a holistic approach to understanding all project components; however, the separation of offshore and onshore evaluations results in an incomplete picture of the combined effects on peatlands, habitats, and local communities.

Sensitive habitats, such as machair systems and peatland environments, face considerable risks and are subject to policy protection. The application fails to adequately assess potential impacts on these habitats or to outline appropriate avoidance measures, creating a significant evidential gap concerning biodiversity protection.

Furthermore, there are concerns regarding carbon balance, as disturbances to peatland may release stored carbon, thereby potentially creating a carbon debt. This contradicts the goals of renewable energy development, and the application does not sufficiently address this issue or affirm that the overall carbon balance remains advantageous.

The routing of infrastructure through active croft land presents additional challenges, introducing conflicts with existing land use and legal rights. The application lacks evidence of the initiation of necessary consents or processes, raising doubts about its deliverability and lawful execution.

From a policy standpoint, the disjointed assessment of the project and the failure to safeguard peatlands, habitats, and land use interests are in conflict with the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be avoided or mitigated further erodes the credibility of the application.

In summary, the separation of project components, lack of comprehensive impact assessments, and insufficient evidence regarding environmental and land use consequences render this aspect of the application incomplete and unreliable, thereby obstructing lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment is deficient as it entirely lacks an evaluation of dark skies and nocturnal wildlife, which constitutes a material omission. The West

Lewis coastline is noted for its exceptionally dark skies, integral to the area's environmental quality, cultural identity, and tourism. 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.

Significantly, the application fails to assess the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This oversight is particularly consequential given the relevance of dark skies to the area's identity and the growth of tourism sectors such as astro-tourism. The lack of such assessments creates a distinct gap in the overall landscape and environmental evaluation.

Moreover, there is no consideration of the potential impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel exhibit high sensitivity to artificial lighting, which can result in disorientation and an increased risk of collision. The absence of any lighting impact assessment or phototaxis study means there is no understanding of how aviation lighting may affect these species or contribute to higher mortality rates.

This gap is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which overlooks nocturnal activity and associated risks. Kittiwakes, which may forage or migrate at night, are similarly at risk of disorientation from artificial lighting, yet this has not been evaluated. The lack of site-specific night-time data leaves a critical void in comprehending ecological impacts.

Without a thorough assessment of nocturnal effects, it is impossible to ascertain whether protected species or designated sites would face adverse consequences. The evidential standard needed to exclude adverse effects beyond reasonable scientific doubt is not fulfilled, thereby invoking the precautionary principle and inhibiting a lawful determination.

From a policy standpoint, the omission contravenes National Planning Framework 4 concerning the safeguarding of natural places and environmental quality. Additionally, it undermines the comprehensive evaluation of landscape and seascape impacts, as the character of night-time environments is a crucial element of the overall setting.

In conclusion, the absence of assessments related to dark skies and nocturnal wildlife represents a significant evidential gap. The deficiency of baseline data, impact modelling, and species-specific analysis renders the application incomplete and unsuitable for a lawful determination.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal represents a significant failure to meet the standards of sustainable development when evaluated against statutory requirements, national policy, and evidential benchmarks. This application mirrors the core issues that resulted in the denial of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. Presenting this proposal under a stronger policy framework, which emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, does not rectify its inherent flaws.

There is a lack of a complete and reliable evidential basis for determination in the application. Critical gaps exist in the baseline data, and the use of an undefined design envelope raises concerns. The reliance on unspecified mitigation measures and the omission of significant impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism, further compromise the application. Consequently, the Environmental Impact Assessment is incomplete, hindering a thorough understanding of likely significant effects and residual impacts.

Procedural shortcomings are also evident. The failure to produce a compliant Island Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018. Moreover, the omission of the complete Social Impact Assessment represents a substantial gap in the information provided. These deficiencies prevent the competent authority from adequately assessing the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

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

The environmental risks associated with this proposal remain uncertain and potentially significant. Assessments of marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also inconsistent in several areas. The evidential threshold required to discount adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful determination of acceptable impacts.

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

When considered collectively, these procedural and substantive deficiencies render the application unfit for determination. The considerable information gaps, policy conflicts, and unresolved environmental risks prevent a lawful, evidence-based decision. Therefore, the competent authority must either refuse consent on these grounds or invoke the relevant regulatory provisions to demand the submission of the missing information.

In light of these concerns, 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 280

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 application exhibits significant evidential deficiencies, highlighted by gaps in baseline data, limitations in methodology, and an overreliance on assumptions rather than site-specific evidence. This leads to uncertainty concerning the scale and significance of impacts, particularly in instances where negligible or non-significant effects are claimed without robust supporting data. The lack of adequate information hinders a clear comprehension of cumulative and worst-case impacts, introducing a level of scientific uncertainty that fails to align with statutory requirements.

Moreover, the proposal does not adequately demonstrate compliance with National Planning Framework 4. The requirements related to biodiversity protection and environmental integrity cannot be satisfied as the assessment does not illustrate that impacts have been thoroughly examined or that necessary safeguards are established. The application seeks consent based on a reliance on unarticulated mitigation measures, monitoring strategies, and management plans that remain undefined. This approach results in an evaluation that is procedurally unacceptable, as it conflicts with the objectives of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation strategies must be clearly determined before a decision is made.

The Environmental Impact Assessment Report is materially deficient and fails to deliver a full, transparent, or reliable account of the likely environmental effects associated with the proposal. The application's use of a flexible Project Design Envelope, devoid of commitment to specific turbine dimensions, layouts, or configurations, contributes to considerable uncertainty and hampers the consistent application of a worst-case scenario. This undermines the integrity of the assessment and precludes both the public and the competent authority from comprehending the true extent of environmental effects.

Consequently, the application does not satisfy the evidential threshold required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, particularly concerning protected species and sensitive habitats. Collectively, the reliance on an undefined

design envelope, the absence of specified mitigation, and the deficiencies in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings obstruct a lawful and rigorous assessment of environmental effects, ultimately leaving the competent authority unable to determine the application based on the information provided.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives presented in the application is materially inadequate and fails to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives based on their environmental effects, the application merely recounts the project's evolution. This narrative approach does not adequately show that less harmful options have been properly identified, assessed, and selected in favour of more damaging solutions.

There is a notable lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the developer has not convincingly demonstrated that the possibility of placing turbines further offshore has been seriously considered, despite the likely reduction in visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline, along with the crucial role that proximity to shore plays in determining impact, highlights the significance of the missing analysis, which prevents any conclusion regarding whether the proposed siting is indeed the least damaging option.

These deficiencies extend to the evaluation of cable routing and landfall, where insufficient evidence is presented to show that alternative routes have been properly explored to avoid or minimise impacts on sensitive receptors. This includes areas of cultural and spiritual significance, such as Barvas Cemetery. The failure to provide a clear avoidance strategy and the absence of comparative analysis suggests that mitigation by design has not been effectively applied, relying instead on post-design mitigation measures.

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

From a policy standpoint, this shortcoming undermines adherence to National Planning Framework 4, particularly concerning the protection of natural places, cultural heritage,

and community wellbeing. The lack of a structured and comparative assessment constitutes a material omission, leading 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 fails to provide a comprehensive and reliable assessment of marine ecology and protected species within the West Lewis coastal environment. This area is recognised for its biological activity and sensitivity, yet the baseline data remains incomplete, and the methodologies used do not adequately account for species presence, behaviour, and habitat use. Consequently, the assessment lacks a sound evidential basis for evaluating potential impacts.

A significant shortcoming is found in the consideration of otters, which are a European Protected Species. The application does not sufficiently recognise or assess their active use of coastal areas for foraging and movement. By neglecting to evaluate their core foraging range and behavioural patterns, the assessment overlooks the potential effects of construction disturbances, noise, and increased activity, ultimately undermining the conclusions drawn regarding the absence of significant impacts on this species.

Further shortcomings are evident in the assessment of basking sharks. The reliance on aerial surveys introduces substantial detection bias, particularly in challenging Atlantic conditions. This method is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that indicate their frequent use of the waters in question. The failure to include or adequately consider such data results in an incomplete understanding of the baseline, which in turn diminishes the reliability of the conclusions reached.

These methodological weaknesses mean that the determination of negligible or non-significant effects relies on assumptions rather than solid evidence. Additionally, the lack of sufficient baseline data hampers any meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises concerns regarding the true extent of risks 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 National Planning Framework 4, as it has not properly identified or assessed protected species. The uncertainty generated by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, necessitating the application of the precautionary principle. In such circumstances, granting consent cannot be justified.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents significant deficiencies in the ornithological assessment, which is riddled with internal inconsistencies and lacks adequate evidence. The west coast of the Isle of Lewis is home to internationally important seabird populations that are already declining, yet the application does not convincingly show that these species will remain unharmed. The development site is situated within key foraging areas and migratory pathways, but the assessment fails to thoroughly analyse the potential impacts of displacement, collision risk, or habitat loss.

A notable contradiction arises within the application, as the developer claims there will be no significant adverse effects while also proposing a Habitats Regulations derogation case. Such a case is only necessary if significant harm is anticipated, raising doubts about the reliability of the assessment and suggesting that the conclusions drawn are not backed by adequate evidence. Furthermore, the assessment does not sufficiently demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will be unaffected. The critical nature of these feeding grounds is not fully recognised, and reliance on modelling techniques introduces uncertainty, particularly concerning species in critical decline like Kittiwakes and Fulmars. The methods employed are likely to underestimate mortality rates, especially given the incomplete baseline data and the incomplete understanding of behavioural responses.

The placement of turbines in a recognised migratory corridor poses further risks, acting as a barrier within an essential flight path used by species migrating between the United Kingdom and Iceland. The application does not adequately consider the long-term consequences of continued mortality in this corridor or the possible effects on species with small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to demonstrate no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, along with data gaps and limitations in modelling, indicates that the required standard of beyond reasonable scientific doubt has not been satisfied. This situation invokes the precautionary principle and hampers a lawful conclusion in favour of consent.

Additionally, the identified shortcomings reflect a failure to adhere to the National

Planning Framework 4, particularly regarding biodiversity protection and the conservation of natural assets. The inability to prove that internationally significant seabird populations will not be adversely affected places the proposal at odds with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity is fundamentally flawed, failing to recognise the West Lewis coastline as a dynamic cultural landscape where the environment, language, tradition, and community are deeply interconnected. The application employs a simplistic perspective, viewing heritage as a collection of isolated, static assets, rather than appreciating their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming is evident in the treatment of culturally important sites, notably the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active locations for burial and spiritual practices; however, the assessment categorises them merely as static features. This oversight neglects their continued significance and the implications that development may have on their context. Such a mischaracterisation results in an incomplete understanding of cultural effects and overlooks their importance in community life.

Moreover, the assessment does not address intangible cultural heritage, such as the Gaelic language, local traditions, and the enduring relationship the community maintains with the coastal environment. These aspects are vital to the area's identity yet are completely omitted from the evaluation, marking a considerable gap. Without acknowledging these factors, the cultural impact of the proposed development cannot be adequately grasped.

Concerns also arise 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 undertaking of Free, Prior and Informed Consent. This lack of substantial engagement undermines the assessment's validity and fails to adhere to established principles regarding participation in matters affecting cultural and environmental interests.

A further procedural shortcoming is the lack of a compliant Island Communities Impact

Assessment, which is mandated under the Islands (Scotland) Act 2018. In the absence of this assessment, the competent authority is unable to meet its legal obligations to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders a lawful determination impossible.

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

In conclusion, the collective failure to assess living heritage, intangible cultural value, community rights, and statutory obligations results in a notable evidential gap. The cultural impacts of the proposed development have not been adequately evaluated, and the application does not offer a sound foundation for determining the true cultural cost associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing associated with the proposal is significantly deficient, lacking the necessary transparency for a lawful evaluation. The developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the complete report has not been made available. This absence creates a substantial evidential gap, hindering both public understanding and the competent authority's ability to fully grasp the social risks identified through the developer's research.

Summaries available indicate that residents are currently experiencing notable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts are based on direct engagement and are thus not speculative in nature. Nonetheless, the failure to disclose the complete assessment prevents thorough scrutiny of the findings and restricts the ability to evaluate their significance within the decision-making framework.

Evidence suggests that the proposal is viewed as a direct threat to community identity and cohesion, with “cultural loss” being highlighted in the developer's own findings. Despite this acknowledgement, the impacts have not been adequately incorporated into the main application nor assigned appropriate weight in the decision-making process. The withholding of the full Social Impact Assessment obscures the true human and social costs of the development.

This lack of transparency also undermines the Environmental Impact Assessment

process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially where the character and functioning of the community may be at stake. The failure to provide the full dataset results in an incomplete evidential basis for assessing the balance of benefits against harm.

From a policy standpoint, the application does not demonstrate compliance with the National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and mitigate harm; however, the evidence available indicates existing adverse effects that have not been fully disclosed. Without the complete assessment, compliance with this policy remains unsubstantiated.

The procedural implications of these deficiencies are substantial. 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 failure to fulfil the evidential requirements mandated by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, along with the evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This situation precludes a lawful determination and underscores the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of seascape, landscape, and visual impacts is significantly lacking and does not sufficiently account for the extent of change or the sensitivity of the affected environment. The character of the West Lewis coastline is defined by its open Atlantic horizon, its undeveloped nature, and a strong sense of remoteness. The introduction of large-scale turbines in close proximity to the shoreline would create an ongoing and overwhelming industrial presence, fundamentally transforming this character and leading to a permanent and irreversible alteration of the landscape.

The application inadequately represents the scale of this visual change. Given the size and proximity of the turbines, they would dominate the views from residential areas, historic sites, and popular coastal locations. This would adversely affect visual amenity and compromise the essential qualities of naturalness and remoteness. The assessment fails to convey the true level of impact or its significance in relation to such a sensitive landscape.

Concerns also arise regarding the selection and presentation of visual viewpoints. There is evidence that the viewpoints selected may not adequately represent the most

sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and significant landscapes. This raises the possibility that the extent of visual impact has been underestimated, diminishing the credibility of the assessment.

Furthermore, the assessment neglects to consider the interconnected relationship between landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these sites as isolated entities rather than acknowledging their interdependence, resulting in an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would sever these relationships, changing the context in which heritage assets are perceived and disrupting their link to the natural horizon. This represents not only a visual impact but also a deeper cultural and spatial harm that has not been sufficiently evaluated in the application.

From a policy standpoint, the proposal directly contradicts the National Planning Framework 4 concerning the protection of natural places and historic assets. The extent of change is incompatible with the obligation to safeguard landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any argument of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. Due to the scale, height, and proximity of the turbines, their presence would be overwhelming and unavoidable. Consequently, 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 depict the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a dependable evaluation and support the conclusion that the proposal is not compatible 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 incomplete. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that will be prepared after consent is granted. This approach makes it impossible to evaluate their adequacy or effectiveness.

This reliance on undefined future measures is alarming due to the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats that can be affected by sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it lacks sufficient detail on how these risks will be prevented, controlled, or monitored.

There is uncertainty about 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 extent, duration, or ecological effects of these impacts. This uncertainty also applies to potential effects on marine species and habitats that have been identified as sensitive in the wider assessment.

The lack of detailed emergency response procedures worsens these issues. By pushing contingency planning to a post-consent stage, the application fails to allow evaluation of whether adequate safeguards are in place to handle pollution events. This introduces procedural risk and undermines the authority's ability to assess environmental protection measures at the point of determination.

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

Overall, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts make the assessment materially deficient. These issues hinder a thorough evaluation of construction and pollution risks and further indicate that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment regarding fisheries and marine life lacks detail and does not adequately evaluate ecological or socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing industry, but the application fails to show how these habitats and uses will be protected or maintained without significant disruption.

A key problem is the assumption that fishing activity can be moved without consequences. There is no evidence provided that alternative fishing grounds exist, are accessible, or can handle additional pressure. This is important, as displacement could

lead to overfishing in other areas and could negatively affect the local fishing fleet's economy. The lack of a clear, evidence-based assessment means that the potential impacts on fisheries and local livelihoods remain unclear.

Furthermore, the proposal poses significant risks to marine species, particularly due to noise generated during construction. The use of high-energy hammer piling for extended periods is expected to cause disturbance over large areas, which could impact species such as dolphins. The anticipated disturbance to a large part of the local bottlenose dolphin population raises serious concerns, yet the application downplays these effects without enough supporting evidence.

There is also a clear contradiction within the application. While it acknowledges that licenses are needed to permit harm to European Protected Species, it simultaneously claims that the impacts are negligible. This inconsistency damages the credibility of the assessment and raises issues about compliance with the Habitats Regulations, especially where harm is expected to require legal authorisation.

Additionally, the assessment does not take into account cumulative impacts from various pressures like habitat disturbance, noise, and fishing activity displacement. Without a thorough evaluation of these combined effects, it is impossible to assess the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not prove adherence to the National Planning Framework 4 or the National Marine Plan. It fails to demonstrate that the development can coexist with current marine users or avoid unacceptable effects on marine biodiversity, which hinders any conclusion that the proposal constitutes sustainable development.

Overall, the shortcomings in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions render the assessment incomplete and unreliable. These issues obstruct a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is incomplete, failing to capture the full extent of impacts associated with this integrated project. The offshore turbines and onshore works are interconnected, yet the current evaluation treats them separately. This fragmented approach obscures the true scale of environmental and socio-economic effects.

The onshore components consist of cabling across protected moorland, the

construction of a substation near Stornoway, and associated access infrastructure through sensitive landscapes. These activities necessitate excavation in areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and ecologically sensitive habitat. However, the application lacks a comprehensive assessment of these impacts, leading to an inadequate understanding of the project's overall environmental footprint.

Moreover, by omitting or postponing the evaluation of onshore impacts, the application hinders a proper appraisal of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively, yet the division between offshore and onshore elements leaves the combined impacts on peatlands, habitats, and communities insufficiently understood.

There are notable risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application does not convincingly demonstrate that impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, creating an evident gap in biodiversity protection.

Concerns also arise regarding carbon balance, as disturbing peatland can release stored carbon, potentially resulting in a carbon debt that contradicts the goals of renewable energy development. The application inadequately addresses this issue and fails to show that the overall carbon balance remains positive.

Additionally, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application does not provide sufficient evidence that the required consents or processes have been initiated, which casts doubt on the deliverability and lawful execution of the proposal.

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

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

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 coastline of West Lewis is known for its exceptionally dark skies, which play a vital role in the area's environmental quality, cultural identity, and appeal to tourism. The introduction of permanent red aviation lighting, visible over long distances, threatens to create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time landscape.

Furthermore, the proposal does not evaluate how this lighting will impact visual amenity, landscape character, or the experiences of both residents and visitors. This is particularly important given that dark skies are integral to the area's identity and to developing tourism sectors like astro-tourism. The lack of consideration for these impacts results in a discernible gap in the overall landscape and environmental evaluation.

There is also a critical failure to assess potential impacts on nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to their phototactic responses, which can lead to disorientation and increased risk of collision. The application does not contain any lighting impact assessment or phototaxis study, failing to evaluate how the proposed aviation lighting may influence these species or contribute to increased mortality rates.

This issue is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which does not account for nocturnal activity or the associated risks. For example, Kittiwakes, which may forage or migrate at night, are at risk of disorientation from artificial lighting, yet this has not been assessed. The absence of site-specific night-time data leads to a crucial gap in understanding the ecological impacts.

Without the necessary assessment of nocturnal effects, it is impossible to ascertain whether protected species or designated sites would suffer adverse impacts. The evidential standard needed to exclude adverse effects beyond reasonable scientific doubt cannot be achieved, which engages the precautionary principle and prevents a lawful decision-making process.

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm highlights a significant failure to meet the principles of sustainable development as defined by statutory duties and national policy. This application mirrors the critical issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was a central concern. Now, despite a policy framework that places increased emphasis on biodiversity, peatland preservation, landscape integrity, and community welfare, the application falls short.

There are substantial gaps in the evidential basis necessary for a thorough determination. Baseline data is incomplete, the design envelope remains undefined, and there is an over-reliance on unspecified mitigation measures. Key impact pathways have been omitted, such as those concerning nocturnal wildlife, comprehensive onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is inadequate, hindering a complete understanding of potential significant effects or residual impacts.

Moreover, procedural failures are apparent. The lack of a compliant Island Communities Impact Assessment breaches the statutory obligations outlined in the Islands (Scotland) Act 2018, and the non-disclosure of the full Social Impact Assessment represents a significant omission. These shortcomings hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal directly contradicts the principles set forth in National Planning Framework 4. It does not adequately protect biodiversity, natural environments, or cultural heritage, fails to demonstrate acceptable health and wellbeing impacts, and lacks evidence of a net economic benefit due to missing tourism impact assessments. Additionally, the cumulative effects of both offshore and onshore components have not been properly evaluated, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially severe. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also inconsistent in certain areas. The necessary evidential threshold to rule out adverse effects beyond reasonable scientific

doubt has not been satisfied, invoking the precautionary principle and obstructing a lawful conclusion regarding the acceptability of impacts.

The proposal would also lead to significant and irreversible alterations to a 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 represent lasting consequences that cannot be mitigated adequately.

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

Additional Comments

Really don't support this project. We live on the coast and are directly impacted by this terrible proposal.

Community investment fund is totally inadequate for what we are likely to lose. I'm unlikely to benefit from it but will have to pay a heavy price for it.

Why do these ginormous beasts have to be so close to our shoreline?????? There's plenty scope to move them well out to sea.

Our beautiful dark skies will be replaced by hundreds of white flood lights and flashing red lights.

Sun setting behind hundreds of turbine blades, the thought makes me sick.

Property values are going to drop as well.

Environmentally these proposals make no sense!! Sea pollution, land pollution, moving massive quantities of peat. Surface water run off. It's a disaster. Not to mention serious damage to aquatic life.

For what!!!

Member of Public 281

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.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species associated with the proposal is significantly lacking, failing to offer a thorough and dependable understanding of ecological receptors in the West Lewis coastal area. This marine system is both highly sensitive and biologically active, yet the existing baseline data remains incomplete, while the methodologies employed do not effectively capture essential aspects such as species presence, behaviour, and habitat utilisation. Consequently, the assessment does not furnish a sound evidential framework for assessing potential impacts.

One notable gap concerns otters, which are classified as a European Protected Species. The application does not adequately acknowledge or assess their active utilisation of coastal regions for foraging and movement. The oversight of their core foraging areas and behavioural patterns leads to an inadequate evaluation of the possible impacts stemming from construction activities, noise, and increased human activity. This deficiency undermines any assertions about the lack of significant effects on the otter population.

Moreover, the assessment of basking sharks exhibits further shortcomings, particularly due to reliance on aerial surveys that introduce considerable detection bias, especially under Atlantic weather conditions. This method is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that demonstrate frequent usage of these waters. The exclusion or insufficient consideration of such data results in an incomplete baseline and diminishes the trustworthiness of the conclusions drawn.

These methodological flaws indicate that the assertions of negligible or non-significant effects rest more on presumptions than on solid evidence. The lack of comprehensive baseline data also hinders a meaningful assessment of cumulative and indirect impacts, including those related to seasonal variations and broader ecosystem interactions. This situation generates uncertainty regarding the actual risks posed to

marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment framework and National Planning Framework 4, as there has been inadequate identification and assessment of protected species. The uncertainty introduced by these shortcomings means that it is impossible to rule out adverse effects beyond a reasonable scientific doubt, thereby necessitating the application of the precautionary principle. In light of these issues, granting consent would not be lawful.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species, contributing to the overall determination that the application lacks a sufficient evidential basis.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm highlights serious deficiencies in meeting the standards of sustainable development, as required by statutory obligations, national policy, and evidential benchmarks. It echoes the critical issues that led to the rejection of the Lewis Wind Power proposal in 2008, when the extent of industrialisation was deemed unacceptable. This current application, while presented under a framework that places increased importance on biodiversity, peatland preservation, landscape integrity, and community welfare, fails to adequately address these priorities.

A reliable evidential foundation for the proposal is noticeably absent. There are significant gaps in baseline data, the design envelope remains undefined, and mitigation measures have not been clearly specified. Additionally, essential impact pathways—including those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism—are overlooked. Consequently, the Environmental Impact Assessment is inadequate, failing to provide a comprehensive understanding of potential significant effects or residual impacts.

Moreover, the process surrounding the application shows clear procedural shortcomings. The lack of a compliant Island Communities Impact Assessment is a breach of statutory duty under the Islands (Scotland) Act 2018, while the failure to present the complete Social Impact Assessment constitutes a critical omission. These issues hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for consideration.

In addition, the proposal contradicts National Planning Framework 4. It does not adequately protect biodiversity, natural environments, or cultural heritage. Furthermore, it fails to demonstrate that health and wellbeing impacts are satisfactory and lacks evidence of net economic benefits, primarily due to insufficient tourism impact modelling. The cumulative effects of both offshore and onshore components have not been thoroughly assessed, leading to a lack of clarity regarding impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain unclear and potentially severe. Evaluations related to marine ecology, seabirds, protected species, and marine mammals are incomplete and occasionally inconsistent. The necessary evidential threshold to eliminate adverse effects beyond reasonable scientific doubt has not been satisfied, which engages the precautionary principle and precludes a lawful conclusion regarding acceptable impacts.

Furthermore, the proposal is set to bring about considerable and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, loss of dark skies, disruption of cultural and visual connections, and negative effects on tourism constitute enduring impacts that cannot be mitigated to an acceptable degree.

Overall, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, along with policy inconsistencies and unresolved environmental risks, inhibit a lawful and evidence-based decision. It is imperative that the competent authority either rejects the application on these grounds or utilises the appropriate regulatory measures to obtain the missing information.

As such, we formally request that the application for the Spiorad na Mara Offshore Wind Farm be rejected in its entirety.

Additional Comments

The wildlife on Lewis is something really special and local to the island. As a resident of the southern uplands I've personally seen the damage done by the wind industry to habit and the natural world.

Please reconsider these plans, its not worth putting nature on the line for industry.

Member of Public 282

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:

The above should be enough to give you pause.

But personally, these people are not listening to suggestions from *anybody* which might mitigate the harm to island heritage and resources: for example moving the project slightly farther out, and making the windmills slightly smaller. They are not even considering changes. This suggests they have nothing but contempt for the people who live in the area they are planning to damage.

I (and the four people I employ) put bread on our tables through tourism. It has suffered just recently through the ferry crisis, the cost of living crisis and the middle east crisis. Please don't load this VERY UNPOPULAR project on top of these ills. There is no local benefit to be had from it, yet we are asked to allow this damage, and share our already-stretched island resources with the workers who are going to be living on the island for 5 years ...

Do not allow this.

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 283

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 for consideration under the relevant marine licensing and Environmental Impact Assessment frameworks. It highlights significant deficiencies across planning, environmental, cultural, and procedural dimensions. Located off the west side of the Isle of Lewis, the area is characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. Concerns regarding the scale, proximity, and design of the proposal emerge due to its potential incompatibility with statutory requirements, national policy, and sustainable development principles.

A critical issue lies in the application's inadequate evidential basis for a lawful determination. There is a notable absence of essential environmental data, while the baseline information provided is both limited and inconsistent. Furthermore, key elements of the proposal remain undefined. The proposal's flexible design framework hinders a clear assessment of likely significant effects. Reliance on unspecified mitigation measures precludes an evaluation of their potential effectiveness. Consequently, the documentation fails to deliver a comprehensive understanding of environmental, cultural, or community impacts, with assertions of negligible or non-significant effects lacking robust evidence.

Moreover, there are evident and substantial conflicts with established policies. The proposal appears misaligned with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural spaces, cultural heritage, and public health and wellbeing. It does not convincingly demonstrate adherence to national obligations aimed at safeguarding biodiversity, climate considerations, and environmental integrity. These inconsistencies directly affect the statutory tests required for consent and hinder the competent authority's capacity to determine the proposal's policy acceptability.

The unprecedented scale of the proposal raises further alarm, with large turbines positioned uncomfortably close to the shoreline, which introduces serious concerns related to landscape capacity, visual impact, and environmental repercussions. Collectively, the insufficiency of information, dependence on undefined mitigation, evidential shortcomings, and clear policy discrepancies illustrate that the application is incomplete and incapable of facilitating a lawful determination. In light of these circumstances, it is imperative that the precautionary principle be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application is fundamentally flawed due to its reliance on an undefined design envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations. This creates considerable uncertainty and undermines the assessment's integrity, making it impossible to accurately evaluate worst-case scenarios. As a result, the impacts presented may not truly represent the development that is ultimately constructed, leaving both the public and the competent authority without a clear understanding of the environmental effects.

Moreover, the Environmental Impact Assessment Report is materially deficient, failing to provide a full and reliable account of the likely environmental impacts of the proposal. It depends heavily on undefined mitigation measures, monitoring strategies, and management plans, which have yet to be articulated. By seeking consent based on the premise that environmental harm will be addressed later, the application effectively precludes any meaningful evaluation of the effectiveness of these measures or an assessment of residual impacts. This deferral of critical information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies be established prior to any determination.

Furthermore, there are notable evidential deficiencies present, including significant gaps in baseline data, limitations in methodology, and a reliance on assumptions rather than site-specific evidence. These shortcomings contribute to uncertainty regarding the scale and significance of impacts, especially when negligible or non-significant effects are concluded without robust supporting data. The lack of adequate information hinders the ability to clearly understand cumulative and worst-case impacts, thereby introducing scientific uncertainties that cannot be reconciled with statutory requirements.

Consequently, the application does not meet the evidential threshold mandated by the Habitats Regulations, which requires exclusion of adverse effects beyond reasonable scientific doubt. This triggers the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate compliance with National Planning Framework 4, particularly with respect to biodiversity protection and environmental integrity, as it does not adequately show that impacts have been fully assessed or that appropriate safeguards are in place.

Overall, the combination of an undefined design envelope, unspecified mitigation measures, and insufficient baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies obstruct a lawful and robust assessment of environmental effects, leaving the competent authority unable to make an informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application fails to provide a structured and evidence-based assessment of alternatives, which is a significant shortcoming in relation to the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a clear comparison of realistic alternatives based on their environmental impacts, it presents a narrative account of project evolution. This narrative does not adequately demonstrate that less harmful options have been identified, assessed, and selected over more damaging solutions.

Moreover, there is no transparent evaluation of alternative offshore locations, development scales, or design configurations. Notably, the application does not show that the developer has seriously considered placing turbines further offshore, which could potentially mitigate visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline and the crucial role of proximity to shore in determining impact further highlight the need for such an analysis. Without it, there can be no conclusion that the proposed siting is the least damaging option available.

The inadequacies also extend to cable routing and landfall assessments, where there is a lack of sufficient evidence demonstrating that alternative routes have been explored to avoid or minimise impacts on sensitive receptors. This includes consideration of areas with cultural and spiritual significance, such as Barvas Cemetery. The absence of a clear avoidance strategy and comparative analysis suggests that mitigation by design has not been implemented, leading to an over-reliance on post-design mitigation measures.

Consequently, the application does not show that environmental harm has been minimised through effective 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 thorough alternatives assessment, it cannot be concluded that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, these deficiencies undermine compliance with National Planning Framework 4, particularly concerning the protection of natural places, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a significant omission, contributing to the overall conclusion that the application has not been adequately assessed and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The West Lewis coastal environment is a highly sensitive and biologically active marine system, yet the assessment of marine ecology and protected species is materially deficient. There is a lack of complete and reliable understanding of ecological receptors, as the baseline data remains incomplete and the methodologies employed fail to adequately capture species presence, behaviour, and habitat use. Consequently, the assessment does not provide a sound evidential basis for evaluating impacts.

A significant shortcoming in this assessment is its failure to properly recognise and assess the active use of coastal areas by otters, a European Protected Species, for foraging and movement. Without consideration of their core foraging range and behavioural patterns, the potential effects of construction disturbance, noise, and increased activity are inadequately evaluated. This oversight undermines any conclusions drawn regarding the absence of significant effects on this species.

The assessment also falls short in addressing basking sharks, where reliance on aerial surveys leads to substantial 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 failure to incorporate or adequately consider such data results in an incomplete baseline and diminishes the reliability of the conclusions presented.

These methodological limitations mean that any conclusions of negligible or non-significant effects are based on assumptions rather than robust evidence. The absence of sufficient baseline data hinders meaningful assessment of cumulative and indirect impacts, including seasonal variation and wider ecosystem interactions, creating uncertainty about the true 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 or the National Planning Framework 4, as protected species have not been appropriately identified or assessed. The uncertainty introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In these circumstances, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents a fundamentally unreliable ornithological assessment, marked by significant gaps in evidence and contradictions that call its conclusions into question. It is situated within key foraging areas and migratory pathways on the west coast of the Isle of Lewis, where internationally important seabird populations, already in decline, reside. Despite this, the assessment fails to demonstrate convincingly that these species will not suffer adverse effects. The implications of displacement, collision risk, or habitat loss have not been adequately evaluated.

There is a crucial inconsistency within the application itself. While the developer concludes that there are no significant adverse effects, they simultaneously propose a Habitats Regulations derogation case, which only arises when significant harm is anticipated. This contradiction further undermines the reliability of the assessment and indicates that the conclusions drawn lack support from the underlying evidence.

Moreover, the assessment does not adequately substantiate 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 fully considered, and the reliance on modelling methodologies introduces substantial uncertainty, particularly concerning species in severe decline like Kittiwakes and Fulmars. It is likely that mortality rates are underestimated due to incomplete baseline data and an insufficient understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor poses an additional significant risk, effectively creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term effects of sustained mortality within this corridor are not adequately assessed, raising concerns for species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to ascertain 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 situation invokes the precautionary principle and precludes a lawful conclusion in support of consent.

Additionally, the identified deficiencies contravene 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 creates a direct conflict with national policy.

In summary, the assessment is rendered unreliable by internal inconsistencies,

methodological weaknesses, and a lack of sufficient evidence. These deficiencies hinder a robust evaluation of potential impacts and support the conclusion that the application fails to meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is a living cultural landscape where environment, language, tradition, and community are deeply intertwined. However, the assessment of cultural heritage and community identity is fundamentally inadequate. It treats heritage as a collection of isolated, static assets instead of recognising their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming is evident in the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are active burial grounds and places of spiritual practice, yet the assessment fails to consider their continued significance and the impact of development on their surroundings. This oversight results in a flawed evaluation of cultural effects and overlooks their importance in community life.

Additionally, the assessment neglects 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 absent from the evaluation, representing a major gap. Without acknowledging these factors, the true cultural impact of the development cannot be adequately understood.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity that aligns with characteristics of an Indigenous People, yet there has been no Free, Prior and Informed Consent process. This lack of meaningful engagement undermines the credibility of the assessment and fails to align with established principles of participation in decisions that affect cultural and environmental matters.

Moreover, there is a critical procedural failure due to the absence of a compliant Island Communities Impact Assessment, which is required under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot meet its legal duty to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders a lawful determination impossible.

From a policy standpoint, these deficiencies place the proposal at odds with National Planning Framework 4, particularly regarding the protection of historic assets and places. The failure to consider both tangible and intangible heritage, as well as living cultural practices, is a clear departure from policy requirements.

In conclusion, the neglect to assess living heritage, intangible cultural value, community rights, and statutory obligations leads to a significant evidential gap. The cultural impacts of the development have not been properly evaluated, and the application lacks a solid foundation for understanding 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 a critical concern that undermines the entire evaluation process for this application. While the developer commissioned a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This significant evidential gap hinders both public understanding and the competent authority's ability to gauge the full scope of social risks identified through the developer's own research.

Summaries available indicate that residents are currently facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These documented impacts stem from direct engagement with the community and are therefore grounded in reality rather than speculation. The failure to release the complete assessment restricts proper scrutiny of these findings and obstructs the determination of their significance in the decision-making process.

There is also a perception among the community that the proposal poses a direct threat to their identity and cohesion, with "cultural loss" highlighted in the developer's own findings. Despite this, the potential impacts have not been adequately incorporated into the main application or given the necessary consideration. The withholding of the full Social Impact Assessment conceals the genuine human and social costs associated with the development.

The implications of this lack of transparency extend to the Environmental Impact Assessment process as well. A comprehensive understanding of the social, economic, and health impacts is vital for developments of this magnitude, especially where community character and functioning are concerned. By failing to provide the complete dataset, the application lacks a thorough evidential foundation for weighing benefits against potential harm.

From a policy standpoint, the application does not satisfy the requirements outlined in National Planning Framework 4 regarding health and wellbeing. Developments should promote positive health outcomes and mitigate harm; however, the existing evidence suggests that adverse effects have not been fully disclosed. Without the full assessment, the application cannot demonstrate compliance with this policy.

The procedural ramifications are significant as well. The competent authority is unable to conduct a robust socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a material omission in the application and a failure to satisfy the evidential standards demanded by the Environmental Impact Assessment regime.

In conclusion, the combination of non-disclosure of the full Social Impact Assessment and evidence of existing adverse impacts leads to an incomplete and unreliable evaluation. This situation obstructs a lawful determination and reinforces the assertion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, landscape, and seascape is significantly inadequate and does not capture the full 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 placement of large-scale turbines in close proximity to the shore would introduce a persistent and overwhelming industrial presence, fundamentally altering this character and leading to a permanent and irreversible transformation of the landscape.

The application falls short in illustrating the extent of this visual alteration. Due to the scale and closeness of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations. This dominance would adversely affect visual amenity and diminish the key qualities of naturalness and remoteness. The assessment does not adequately communicate the level of impact nor its importance in the context of such a sensitive landscape.

Concerns also arise regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that the chosen viewpoints may not sufficiently represent the most sensitive receptors or the worst-case scenarios, particularly concerning significant cultural heritage sites and valuable landscapes. This risk suggests that the visual impact has been understated, calling into question the assessment's reliability.

Another significant shortcoming is the failure to consider the interconnected relationship between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape linked visually and spatially to the Atlantic horizon. The assessment treats these assets in isolation, failing to acknowledge their interdependence and leading to an incomplete evaluation of the impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are appreciated and severing their connection to the natural horizon. This represents not only a visual impact but also a wider cultural and spatial detriment that has not been thoroughly examined within the application.

From a policy standpoint, the proposal directly contradicts the National Planning Framework 4 in terms of preserving natural places and historic assets. The magnitude of change contradicts the requirement to protect landscape character, visual amenity, and the settings of culturally significant sites. Furthermore, the lack of a comprehensive worst-case assessment further undermines any assertion of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and inescapable. The resulting changes are therefore fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation measures.

Overall, the assessment inadequately conveys the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These deficiencies hinder a reliable evaluation and strengthen the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

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

This reliance on unspecified future measures raises particular concerns due to 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. The application acknowledges the risks of sediment mobilisation and accidental chemical or oil spills but lacks adequate detail on how these issues will be prevented, controlled, or monitored.

Moreover, there is uncertainty about the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without thorough modelling

and clearly 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 identified as sensitive in the broader assessment.

The situation is further exacerbated by the absence of detailed emergency response procedures. By postponing contingency planning until after consent, the application obstructs the evaluation of whether suitable safeguards are available to address pollution incidents. This introduces procedural risks and diminishes the ability of the competent authority to assess environmental protection measures at the decision-making stage.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. Significant likely effects and mitigation must be evaluated before consent is granted, and the lack of such information precludes a lawful determination. The application also fails to demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the absence of clearly defined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts collectively render the assessment materially inadequate. These deficiencies hinder a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application poses serious concerns regarding the assessment of marine life and fisheries, which appears fundamentally inadequate. The waters off the West Lewis coast are home to a rich marine ecosystem and a thriving fishing industry. However, the application does not convincingly demonstrate how these critical uses and habitats can be protected against significant disruption.

A troubling aspect of the proposal is the assumption that fishing activities can be relocated without any repercussions. There is no evidence provided to confirm that alternative fishing grounds exist or that they would be accessible and capable of handling increased pressure. This is a significant omission, as forcing fishing displacement could lead to overfishing in other areas, ultimately threatening the livelihoods of the local fishing fleet. Without a thorough and evidence-based assessment, understanding the true impacts on fisheries and the communities dependent on them is impossible.

Moreover, the proposal presents considerable risks to marine species, particularly due to underwater noise from construction activities. The prolonged use of high-energy hammer piling is expected to create disturbances that could affect marine life over extensive areas, including the local population of bottlenose dolphins. The application seems to downplay the predicted effects on these dolphins, despite the serious nature of the threat, lacking adequate evidence to support such minimisation.

There is a troubling inconsistency within the application regarding the need for licences for any harm to European Protected Species. While it acknowledges the requirement for such permits, it simultaneously describes these impacts as negligible. This contradiction seriously undermines the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

Additionally, the assessment does not adequately address the cumulative impacts resulting from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these interrelated effects, it is impossible to ascertain the overall impact on marine ecosystems and the socio-economic conditions tied to them.

From a policy perspective, the application fails to demonstrate compliance with the National Planning Framework 4 and the National Marine Plan. It does not provide assurance that the development can coexist with existing marine users or that it will avoid unacceptable impacts on marine biodiversity, thus hindering any conclusion that the proposal represents sustainable development.

In conclusion, the combination of insufficient evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the application render the assessment incomplete and unreliable. These shortcomings significantly hinder a comprehensive evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is fundamentally lacking and fails to encompass the full range of impacts stemming from what constitutes a single integrated project. The offshore turbines and onshore works are closely interconnected, yet they have been evaluated separately. This disjointed approach obscures the true magnitude of the environmental and socio-economic consequences.

The onshore components involve significant activities such as cabling across protected moorland, the construction of a substation near Stornoway, and the establishment of

access infrastructure through sensitive landscapes. These operations necessitate excavation in areas of deep peat, especially within Barvas Moor, which serves as a vital carbon store and is an ecologically delicate habitat. The application does not deliver a thorough assessment of these impacts, thus hindering a complete understanding of the project's overall environmental footprint.

Moreover, by deferring or omitting the assessment of onshore impacts, the application obstructs an appropriate evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all aspects of a project must be reviewed collectively; however, the distinct assessment of offshore and onshore components fails to capture the combined effects on peatlands, habitats, and communities.

There are also grave risks posed to sensitive habitats, including machair systems and peatland environments, which are afforded policy protection. The application does not adequately illustrate that the impacts on these habitats have been thoroughly evaluated or that suitable avoidance measures have been implemented, leaving a significant evidential gap concerning biodiversity protection.

The proposal additionally raises issues regarding carbon balance. Disturbing peatland can release stored carbon, potentially creating a carbon debt that contradicts the goals of renewable energy initiatives. This application does not sufficiently address this concern or prove that the overall carbon balance remains favourable.

Furthermore, the routing of infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. The application does not present evidence that the requisite consents or procedures have been initiated, leading to uncertainty regarding deliverability and lawful implementation.

From a policy standpoint, the failure to consider the project as a unified whole and 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 division of project components, the lack of a comprehensive assessment, and the absence of evidence regarding environmental and land use impacts render this segment of the application incomplete and unreliable, precluding a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposed development introduces permanent red aviation lighting that will be visible over long distances, creating an intrusive "wall of light" effect across the western

horizon. This alteration will fundamentally change the night-time environment of the West Lewis coastline, which is characterised by exceptionally dark skies that are crucial to the area's environmental quality, cultural identity, and tourism value. The Environmental Impact Assessment notably fails to address the implications of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. Given the rising importance of dark skies to tourism sectors such as astro-tourism, this omission is particularly concerning.

Furthermore, the proposal does not evaluate the impacts on nocturnal wildlife, which is a critical oversight. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to their phototactic behaviour, making them susceptible to disorientation and increased collision risks. The absence of a lighting impact assessment or a phototaxis study means that the potential effects of the aviation lighting on these species, and the risk of increased mortality, remain unexamined.

This issue is exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to capture the nocturnal activity and the associated risks. Kittiwakes, for instance, may forage or migrate at night and are similarly at risk from disorientation caused by artificial lighting. The lack of site-specific night-time data creates a significant gap in understanding the ecological impacts of the proposal.

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

From a policy standpoint, the failure to evaluate these factors is in conflict with National Planning Framework 4 concerning the protection of natural places and environmental quality. Moreover, it undermines the overall assessment of landscape and seascape impacts, as the night-time character is an integral part of the environment. In summary, the absence of any evaluation of dark skies and nocturnal wildlife signifies a substantial 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 evaluation of tourism impacts in the application is severely lacking, failing to adequately consider the economic and social repercussions for a crucial sector of the Isle of Lewis economy. The tourism industry relies heavily on the area's stunning wild

coastline, nearly untouched landscapes, dark skies, and its overall sense of remoteness. Although the application acknowledges that 86% of visitors are attracted by the scenery, it does not provide a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, their behaviour, or the overall economic contributions made by tourism.

Significantly, tourism has experienced remarkable growth, escalating from £65 million in 2017 to over £81.5 million, while supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. However, the application does not assess how the industrialisation of the seascape and the degradation of environmental quality could impact Tourism Gross Value Added or the broader economic resilience of the area. Without such vital analysis, it remains impossible to ascertain whether the proposed development would yield a net economic benefit or adversely affect this established and expanding sector.

Additionally, the assessment neglects to consider how environmental quality underpins tourism, particularly the significance of unspoiled landscapes and dark skies to the overall visitor experience. This disregard for an essential element of the tourism sector is further exacerbated by the absence of a Dark Skies Assessment, creating a substantial gap in the understanding of impacts on a recognised and burgeoning segment of the local economy, such as nature-based tourism and astro-tourism.

The implications of this oversight extend beyond tourism, as the island community has limited economic diversification. The failure to evaluate the impacts on tourism can have broader repercussions for employment, local businesses, and the sustainability of the community. The lack of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been addressed, contravening the requirements outlined in the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not adequately demonstrate alignment with the National Planning Framework 4, especially regarding economic impact and the necessity to illustrate net benefit. It conflicts with strategic objectives that prioritise tourism as a vital growth sector and fails to present sufficient evidence for the competent authority to assess the economic implications of the proposal.

Collectively, the lack of quantification of tourism impacts, the insufficient consideration of environmental factors that drive visitor behaviour, and the disregard for the island's economic dependence on tourism culminate in a significant evidential gap. This shortfall hampers 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 failure to meet the requirements of sustainable development, which is evident when assessed against 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 highlighted. This new application, despite being submitted under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, fails to provide a reliable evidential basis for determination.

Critical gaps in baseline data are evident throughout the application. It relies on an undefined design envelope, incorporates unspecified mitigation measures, and omits key impact pathways related to nocturnal wildlife, full onshore infrastructure, and tourism effects. As a result, the Environmental Impact Assessment is incomplete, failing to facilitate a comprehensive understanding of likely significant effects or residual impacts.

Moreover, there are procedural failings that further undermine the application. The lack of a compliant Island Communities Impact Assessment breaches statutory duty as outlined in the Islands (Scotland) Act 2018. Additionally, the failure to disclose the complete Social Impact Assessment is a significant omission. These deficiencies obstruct the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

This proposal stands in direct opposition to the National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural landscapes, or cultural heritage. The application 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 impacts of both offshore and onshore elements have not been properly evaluated, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and could be significantly detrimental. 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 achieved, thus invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is procedurally and substantively unfit for determination. The vast information deficiencies, combined with conflicts with policy and unresolved environmental risks, obstruct any lawful, evidence-based decision-making process. Therefore, the competent authority must either refuse consent based on these grounds or invoke the relevant regulatory provisions to demand the submission of the missing information. A formal request is made for the refusal of the application for the Spiorad na Mara Offshore Wind Farm in its entirety.

Additional Comments

The Western Isles are unique. Their wild beauty, wildlife and amazing land and sea scapes are known and admired globally. Much effort over the years has been devoted to protecting the fragile and internationally important ecology of the Outer Hebrides and the West coast of Scotland. To install such a vast wind farm would put this eco system at a significant risk with the danger of losing it forever. These remote communities rely on tourism for survival. Nobody wants to look across the sea at such eyesores and the wildlife they have travelled to see won't be there. There are better locations and solutions to our energy crisis. Put solar panels on ALL new buildings for a start. This proposal is not the answer and I vehemently oppose it .

Member of Public 284

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 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.

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.'

Significant Adverse Impacts on Marine Mammals and Protected Marine Habitats: The Outer Hebrides are described by the Scottish Government's own scientists as "probably the richest area of the UK for marine mammals with around 20 species of cetacean recorded in the region over the last 30 years" (Scottish Marine and Freshwater Science

Vol. 5 No. 9). The site lies adjacent to the Inner Hebrides and Minches SAC - the largest harbour porpoise SAC in Europe - within the wider range of the North-east Lewis MPA for Risso's dolphin, within documented fin and sperm whale migration corridors (Blue Corridors initiative), and within the wider feeding and habitat range of minke, humpback and sei whales, and within the foraging range of the Monach Isles grey seal colony (the largest in Europe). The EIAR fails to reflect this internationally significant baseline in its significance conclusions and cannot demonstrate, to the legal standard required, that adverse effects on these protected sites and species will be avoided. Under the Habitats Regulations Appraisal process, consent must be refused unless Scottish Ministers are satisfied beyond reasonable scientific doubt that the integrity of European sites will not be adversely affected (NatureScot HRA guidance). That standard has not been met.

Construction noise: The developer's own noise modelling (EIAR Appendix 19.2) provides for up to 5.5 hours of percussive piling per day, up to 10,635 strikes per pile per day, hammer energies up to 5,000 kJ, and 1,563 pin piles across two consecutive construction years (April–October). The EIAR itself acknowledges that "harbour porpoises are widely regarded as the most sensitive marine mammal receptor to underwater noise" and that behavioural disturbance can occur up to 70 km from piling (Bailey et al., 2010, cited in Chapter 13). The proposed piling window coincides with peak cetacean seasonal density and with harbour seal pupping (June–July), triggering the prohibition on deliberate disturbance of European Protected Species during breeding and rearing periods under the Conservation of Habitats and Species Regulations 2017 and Section 9 of the Wildlife and Countryside Act 1981.

The developer's own underwater noise modelling (EIAR Appendix 13.3) confirms that, even with noise mitigation applied, percussive piling at the northernmost foundation location generates a PTS (permanent auditory injury) range of up to 1,500 m for low-frequency cetaceans and a TTS (temporary auditory injury) range of up to 49 km. These are the developer's own figures, after mitigation. Low-frequency cetaceans include minke, fin, sei and humpback whales - all species documented in these waters. A 49 km auditory injury zone, repeated across an April–October piling window for two consecutive years, cannot credibly be reconciled with a classification of effects as "not significant."

NMP Policy GEN 13: development should avoid significant adverse effects of man-made noise and vibration on species sensitive to such effects. The EIAR predicts disturbance to 9.186% of the Risso's dolphin management unit population and 27.7% of the coastal bottlenose dolphin population from piling noise, yet classifies these effects as "not significant." GEN 13 sets an avoidance standard, not a tolerance threshold.

The developer's own EPS and Basking Shark Risk Assessment (submitted to Marine Scotland, 22 February 2023) formally acknowledges risk of disturbance to minke whale,

harbour porpoise, common dolphin, bottlenose dolphin, grey seal and basking shark from survey work alone. Full construction at this scale cannot credibly be claimed to present a lesser risk.

The 2023 Tolsta Stranding: In July 2023, 54 of 55 long-finned pilot whales died on Traigh Mhòr beach while geophysical surveys were being carried out at this lease area. The Scottish Government investigation could not rule out anthropogenic contribution and explicitly acknowledged limitations in the acoustic detection capability of the recorders used. This recent and devastating event must weigh heavily in this decision.

Priority Marine Features and seabed disturbance: Kelp beds - confirmed present across 10 km² within the Study Area and designated as a PMF and blue carbon habitat - are assessed as sustaining "minor adverse" impact, with no compensatory measures proposed. Maerl beds, horse mussel beds, fan mussel aggregations and cold-water coral reefs (all Scottish PMFs) are either excluded on the basis of decade-old desktop data (Tyler-Walters et al., 2016) or not mentioned at all. The developer concedes that its primary mitigation - micro-siting of turbines and cables - "cannot be quantified until detailed design and further site-specific investigations are complete."

NMP GEN 5: safeguard natural carbon sinks including kelp beds. NMP GEN 9: do not result in significant impact on the national status of Priority Marine Features, and protect and enhance the health of the marine area.

Cumulative and in-combination effects: The Habitats Regulations require assessment of cumulative effects with other plans and projects. The Scottish Government's own 2026 ICIA Screening Report concedes that Scottish offshore wind plans are "likely...to undergo the derogations process under the Habitats Regulations." Spiorad na Mara is one of several large developments proposed in or adjacent to these waters; the cumulative assessment does not rigorously meet this requirement. NMP GEN 21 requires cumulative impacts affecting the ecosystem to be addressed.

Inadequate assessment and deferred mitigation: The joint representation from the Hebridean Whale and Dolphin Trust and Whale and Dolphin Conservation states that baseline cetacean data is "severely lacking." Proposed mitigation (MMOs, PAM, soft-start) is designed to address acute physical injury, not behavioural displacement; JNCC guidance confirms PAM has "limited range" for harbour porpoise and is "not suitable" for seals and baleen whales. Key mitigation is deferred to a post-consent Marine Mammal Mitigation Protocol, preventing Scottish Ministers from assessing adequacy at the point of determination - contrary to the beyond-reasonable-scientific-doubt standard required under the Habitats Regulations. Peer-reviewed monitoring at Scottish offshore wind farm construction sites (Benhemma-Le Gall et al. 2021, *Frontiers in*

Marine Science) observed harbour porpoise displacement up to 12 km from pile-driving and 4 km from construction vessels alone - distances that no MMO, PAM or soft-start zone can address.

The EPS licence contradiction: The EIAR identifies that activities may require an EPS licence due to disturbance at a level requiring legal derogation, while simultaneously concluding residual effects are "negligible or minor." Under the Conservation of Habitats and Species Regulations 2017, an EPS licence can only be granted where no satisfactory alternative exists, imperative reasons of overriding public interest apply, and favourable conservation status is maintained. The EIAR demonstrates none of these.

Basking sharks (IUCN Endangered) were recorded by the developer's own July 2023 aerial survey (EIAR Appendix 13.1). The EIAR does not adequately assess EMF impacts from subsea cables on elasmobranchs, despite Scottish Government ScotMER research identifying this as an unresolved evidence gap (FF.07).

No alternative solutions: Under the Habitats Regulations, consent cannot be granted if alternative solutions exist. Other ScotWind sites are available in waters without the same density of European Protected Species and designated habitats, and the existence of those alternatives is directly relevant to whether consent for this site can lawfully proceed.

Consent would therefore breach or inadequately address the Conservation (Natural Habitats &c.) Regulations 1994, the Conservation of Habitats and Species Regulations 2017, the Marine (Scotland) Act 2010, Section 9 of the Wildlife and Countryside Act 1981, NMP Policies GEN 5, GEN 9, GEN 13 and GEN 21, and ASCOBANS Resolution 7.6 (2016) on underwater noise.

My further objection points:

Destruction of pristine landscape, damage to wild salmon and bird life, damage to tourism

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 285

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 regimes. A thorough review of the Environmental Impact Assessment Report and accompanying documentation reveals significant planning, environmental, cultural, and procedural deficiencies associated with the development. Located off the west side of the Isle of Lewis, the area is characterised by its Atlantic-facing coastline, near-pristine environment, and robust cultural identity. The proposal's scale, proximity to the shoreline, and design raise serious concerns about its compliance with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for a lawful determination. It presents critical gaps in environmental data, and baseline information is both limited and inconsistent. Many key aspects of the proposal remain undefined, leading to ambiguity regarding likely significant effects. The flexible design framework employed complicates the assessment further, as it relies on unspecified mitigation measures, rendering it impossible to evaluate their effectiveness. Consequently, the documentation fails to provide a complete understanding of potential environmental, cultural, or community impacts, and assertions of negligible or non-significant effects are unsupported by credible evidence.

Moreover, the application shows clear conflicts with established policies. 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 applicant has not sufficiently demonstrated compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These policy conflicts are directly relevant to the statutory tests required for consent and weaken the competent authority's ability to conclude that the development is acceptable in policy terms.

The unprecedented scale of the proposal, with large turbines situated close to the shoreline, raises substantial concerns about landscape capacity, visual dominance, and overall environmental impact. The combination of insufficient information, reliance 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 should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application presents significant evidential deficiencies, characterised by gaps in baseline data and limitations in methodology. It relies on assumptions rather than site-specific evidence, resulting in uncertainty regarding the scale and significance of impacts. Specifically, conclusions regarding negligible or non-significant effects are not backed by robust supporting data. This lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that is incompatible with statutory requirements.

Moreover, the Environmental Impact Assessment Report is materially deficient, lacking a full, transparent, or reliable account of the likely environmental effects of the proposal. The proposal utilises a flexible Project Design Envelope that does not commit to specific turbine dimensions, layouts, or configurations. This introduces significant uncertainty and hinders the consistent application of a worst-case scenario. Consequently, the impacts presented may not accurately reflect the development that is ultimately constructed, which prevents both the public and the competent authority from comprehending the true extent of environmental effects.

Consent is sought based heavily on mitigation measures, monitoring strategies, and management plans that have yet to be defined. This approach means that environmental harm is intended to be addressed at a later stage, thereby obstructing any meaningful evaluation of effectiveness or assessment of residual impacts. Such deferral of key information to post-consent stages is procedurally unacceptable, undermining the fundamental purpose of the Environmental Impact Assessment regime, which necessitates that likely significant effects and mitigation are clearly established prior to determination.

In light of these deficiencies, the application does not meet the evidential threshold required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This raises concerns regarding the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate compliance with National Planning Framework 4, which includes requirements related to biodiversity protection and environmental integrity, as it cannot be established that impacts have been fully assessed or that appropriate safeguards are in place.

Overall, 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 impede a lawful and robust assessment of environmental effects and place the competent authority in a

position where it cannot adequately determine the application based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species is inadequate and does not deliver a thorough or trustworthy understanding of the ecological receptors in the West Lewis coastal area. This marine environment is sensitive and biologically rich. However, the baseline data is lacking, and the methodologies employed do not effectively capture the presence, behaviour, and habitat usage of various species. Consequently, the assessment fails to provide a strong evidential basis for evaluating potential impacts.

One significant oversight is the treatment of otters, a species protected under European law. The application does not adequately acknowledge or assess their active use of the coastal areas for foraging and movement. This absence of consideration regarding their core foraging range and behavioural patterns means that the potential impacts of construction disturbances, noise, and increased human activity have not been sufficiently evaluated. This flaw undermines any assertions about the absence of significant effects on otters.

Deficiencies also appear in the assessment of basking sharks. The reliance on aerial surveys introduces considerable detection bias, particularly under Atlantic conditions, which is likely to lead to an underestimation of their presence. This is particularly evident when compared to well-established land-based observations that highlight frequent use of these waters. The neglect to incorporate or adequately consider such data contributes to an incomplete baseline and diminishes the reliability of the presented conclusions.

These methodological shortcomings result in conclusions of negligible or non-significant effects being based more on assumptions than on solid evidence. The lack of sufficient baseline data also hampers a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises questions about the actual risks to marine species and their habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment process and the National Planning Framework 4, as it has not properly identified or assessed protected species. The level of uncertainty introduced means that it cannot be confidently claimed that adverse effects are excluded beyond reasonable scientific doubt, which invokes the precautionary principle. Thus, consent cannot be lawfully granted in these circumstances.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application raises significant concerns regarding its compliance with the evidential requirements for assessing impacts on biodiversity, particularly concerning internationally important seabird populations along the west coast of the Isle of Lewis. These populations are already in decline, and the application fails to demonstrate, to the necessary evidential standard, that these species will remain unaffected. The development is situated within critical foraging areas and migratory pathways, yet the assessment inadequately evaluates potential risks associated with displacement, collision, and habitat loss.

Furthermore, the conclusions drawn by the developer are fundamentally contradictory. While asserting that no significant adverse effects will occur, the application simultaneously puts forward a Habitats Regulations derogation case, which is only required if significant harm is anticipated. This inconsistency undermines the reliability of the ornithological assessment, indicating that the conclusions are not sufficiently supported by the evidence presented.

The assessment falls short in providing adequate evidence regarding the seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda. The critical nature of these feeding grounds is not thoroughly considered, and the reliance on modelling techniques raises uncertainties, especially for species that are in severe decline, like Kittiwakes and Fulmars. The methods employed are likely to underestimate mortality rates, particularly where baseline data is lacking and the behavioural responses of these species are not fully understood.

The siting of the proposed turbines within a recognised migratory corridor presents an additional significant risk, effectively acting as a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently analyse the long-term consequences of sustained mortality in this corridor or the potential effects on species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to assert 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 fulfilled. This invokes the precautionary principle and hinders a lawful conclusion in favour of consent.

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.

In conclusion, the assessment is rendered unreliable due to internal inconsistencies, methodological weaknesses, and insufficient evidence. These shortcomings hinder a robust evaluation of impacts and contribute to the overall determination that the application does not meet the statutory requirements necessary for a lawful decision.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is fundamentally flawed, failing to recognise the West Lewis coastline as a living cultural landscape where the environment, language, tradition, and community are interconnected. The application takes a reductive approach by treating heritage merely as a collection of isolated, static assets, disregarding their ongoing social, cultural, and spiritual significance within the community.

A critical shortcoming is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are active burial and spiritual sites; however, they are mischaracterised as static features. This oversight neglects their continued use and meaning, as well as the potential impact of development on their surroundings. The result is an incomplete evaluation of cultural effects, overlooking their vital role in community life.

Additionally, the assessment fails to consider intangible cultural heritage elements, including the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These aspects are crucial to the area's identity, yet they are entirely omitted from the assessment, representing a significant gap. Without addressing these factors, it is impossible to fully understand the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population possesses a unique cultural identity with characteristics recognised in Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the legitimacy of the assessment and fails to align with established principles of participation in matters affecting cultural and environmental interests.

Another procedural failure is the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The competent authority is unable to fulfil its legal obligation to assess the social, cultural, and economic impacts on the island community without this assessment, preventing a lawful determination.

From a policy standpoint, these shortcomings put the proposal at odds with National Planning Framework 4, especially concerning the protection of historic assets and places. The neglect to account for both tangible and intangible heritage, as well as the failure to acknowledge living cultural practices, clearly diverges from policy requirements.

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The failure to publish the full Social Impact Assessment commissioned by the developer represents a significant evidential gap in the planning application. This gap hinders the public and competent authorities from understanding the full extent of social risks identified through the developer's own research. Summaries suggest that local residents are already experiencing measurable levels of stress, anxiety, and concern due to the proposal's scale and proximity. These impacts stem from direct engagement with the community and are therefore factual rather than speculative. However, without access to the complete assessment, there is insufficient scrutiny of the findings, which limits the determination of their significance in the decision-making process.

Furthermore, evidence indicates that the proposal threatens community identity and cohesion, with the developer acknowledging "cultural loss" in their findings. Despite the recognition of these impacts, they have not been fully integrated into the main application or given the appropriate weight they deserve. The withholding of the complete Social Impact Assessment obscures the true human and social costs associated with the development, which is crucial information for stakeholders.

The absence of transparency also undermines the Environmental Impact Assessment process, as a thorough understanding of the social, economic, and health impacts is essential for developments of this nature, particularly when community character and

functioning are at stake. By failing to provide the complete dataset, the application lacks a comprehensive evidential basis required to assess the balance between the proposed benefits and potential harms.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments are required to support positive health outcomes and to avoid causing harm, yet the available evidence highlights existing adverse effects that have not been fully disclosed. Without the complete assessment, it is impossible to verify adherence to this policy.

The procedural ramifications of this non-disclosure are significant. The competent authority is unable to conduct a robust socio-economic and health evaluation without access to the full Social Impact Assessment. This omission constitutes a material shortcoming in the application and represents a failure to meet the evidential requirements set forth by the Environmental Impact Assessment regime.

In summary, the lack of disclosure regarding the full Social Impact Assessment, coupled with documented evidence of existing adverse impacts, results in an incomplete and unreliable assessment. This situation prevents a lawful determination and reinforces the conclusion that the application does not possess sufficient supporting information.

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 absence of comprehensive Construction Environmental Management Plans and Pollution Prevention Plans significantly undermines the assessment of construction and pollution risks associated with the proposal. This lack of detail is particularly troubling given the extensive seabed preparation and installation works planned within a high-energy Atlantic environment. The application's reliance on mitigation and contingency measures that will only be formulated post-consent hinders a meaningful evaluation of their potential adequacy or effectiveness.

This situation is exacerbated by the sensitivity of the West Lewis coastline, which is

home to clean coastal waters and vital habitats that are susceptible to 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 adequate detail on prevention, control, or monitoring strategies.

Moreover, there exists considerable uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. The lack of robust modelling and clearly defined management strategies prevents a clear determination of the extent, duration, or ecological consequences of these impacts. This uncertainty also extends to the potential effects on marine species and habitats already identified as sensitive in the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. The decision to defer contingency planning until after consent has been granted limits the ability to ascertain whether appropriate safeguards are available to address potential pollution events. This creates procedural risk and weakens the competent authority's capacity to evaluate environmental protection measures at the moment of determination.

From a regulatory standpoint, deferring essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. An assessment of likely significant effects and mitigation must occur prior to consent, and the absence of such information renders a lawful determination unfeasible. Additionally, the application does not demonstrate compliance with relevant policy requirements concerning environmental protection and water quality.

Ultimately, the combined shortcomings of undefined mitigation measures, inadequate management plans, and uncertainty about potential impacts result in a materially deficient assessment. These deficiencies obstruct a thorough evaluation of construction and pollution risks, thereby reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents significant deficiencies in its assessment of marine life and fisheries, failing to provide a comprehensive evaluation of ecological or socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and a thriving fishing industry. However, the proposal does not demonstrate that these habitats and uses can be safeguarded from disruption.

One major issue is the assumption that fishing activities can be displaced without adverse effects. The application lacks evidence that alternative fishing grounds exist,

are accessible, or can endure additional pressure. This absence of information is crucial, as such displacement could lead to overfishing in other areas and have broader economic implications for the local fishing fleet. Without a thorough and evidence-based assessment, the potential effects on fisheries and local livelihoods remain unclear.

The proposal also poses significant risks to marine species, particularly due to underwater noise from construction activities. Prolonged hammer piling may disturb marine life over large areas, with the local bottlenose dolphin population expected to be significantly affected. The application downplays the seriousness of these impacts without adequate evidence, raising concerns about its reliability.

Moreover, there is a noticeable inconsistency within the application regarding the need for licences to harm European Protected Species, while simultaneously classifying these impacts as negligible. This contradiction questions the credibility of the assessment and highlights potential issues with compliance under the Habitats Regulations, particularly when harm is expected to a degree that necessitates legal authorisation.

The assessment neglects to address cumulative impacts arising from various pressures, such as habitat disturbance, noise pollution, and fishing displacement. 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 viewpoint, the application fails to demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not show that the proposed development can coexist with current marine users or that it can avoid unacceptable impacts on marine biodiversity. Consequently, it cannot be concluded that the proposal constitutes sustainable development.

In summary, the combination of insufficient evidence regarding fishing displacement, underappreciation of acoustic impacts, and internal inconsistencies renders the assessment unreliable. These shortcomings obstruct a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is fundamentally flawed and fails to acknowledge the comprehensive impacts stemming from a single integrated project. The offshore turbines and onshore works are interconnected yet are evaluated separately, leading to a disjointed approach that clouds the real environmental and socio-economic consequences.

The onshore components involve cabling traversing protected moorland, the construction of a substation near Stornoway, and associated access infrastructure through delicate landscapes. These undertakings require excavation across areas of deep peat, especially within Barvas Moor, which serves as a crucial carbon store and ecologically sensitive area. The application lacks a thorough assessment of these effects, hindering a full comprehension of the project's overall environmental footprint.

By neglecting or postponing the assessment of onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project elements be reviewed together; however, the disconnection of offshore and onshore components results in a failure to grasp the combined impacts on peatlands, habitats, and local communities.

Moreover, there are substantial risks posed to sensitive habitats, including machair systems and peatland environments, which are under policy protection. The application does not provide evidence that the impacts on these habitats have been sufficiently assessed or that suitable avoidance measures have been enacted, leaving a significant evidential gap concerning biodiversity protection.

Concerns also arise regarding carbon balance. Disturbing peatland can release stored carbon, potentially resulting in a carbon debt that contradicts the goals of renewable energy initiatives. The application inadequately addresses this concern and does not demonstrate that the overall carbon balance is beneficial.

Furthermore, routing infrastructure through active croft land may introduce conflicts with existing land use and legal rights. The application fails to offer evidence that the necessary consents or procedures have been initiated, casting doubt on its deliverability and lawful execution.

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

In summary, the division of project components, lack of comprehensive assessment, and absence of evidence regarding environmental and land use impacts render this portion 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, creating a continuous and intrusive “wall of light” effect across the western horizon. This alteration fundamentally affects the night-time environment of the West Lewis coastline, which is distinguished by exceptionally dark skies that contribute significantly to environmental quality, cultural identity, and tourism value.

The Environmental Impact Assessment fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. Given the importance of dark skies to the area’s identity and to emerging tourism sectors, such as astro-tourism, this omission is significant and results in a clear gap in the overall landscape and environmental assessment.

Moreover, there is no evaluation of the impacts on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are notably sensitive to artificial lighting due to phototaxis, which can cause disorientation and increased collision risk. The application lacks a lighting impact assessment or a phototaxis study, failing to assess how aviation lighting may affect these species or potentially increase mortality rates.

The reliance on daytime survey data in the ornithological assessment does not adequately capture nocturnal activity or the associated risks. Species such as Kittiwakes, which may forage or migrate at night, are also vulnerable to disorientation from artificial lighting, yet the risk remains unassessed. The absence of site-specific night-time data presents a critical gap in understanding ecological impacts.

Without a thorough assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt cannot be met, thereby engaging the precautionary principle and obstructing a lawful determination.

From a policy standpoint, this omission contradicts National Planning Framework 4 concerning the protection of natural places and environmental quality. It further undermines the broader assessment of landscape and seascape impacts, as the night-time character is integral to the environment.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the standards of sustainable development when evaluated against national policy, statutory obligations, and evidential requirements. Notably, this application brings forth the same principal issues that led to the rejection of the Lewis Wind Power proposal in 2008, which highlighted an unacceptable level of industrialisation. Although presented under an enhanced policy framework that prioritises biodiversity, peatland conservation, landscape integrity, and community wellbeing, the application remains fundamentally flawed.

A significant concern is the lack of a complete and reliable evidential basis for determination. Critical gaps exist in baseline data, and there is continued reliance on an undefined design envelope alongside unspecified mitigation measures. Key impact pathways are omitted, including those related to nocturnal wildlife, the full extent of onshore infrastructure, and effects on tourism. Consequently, the Environmental Impact Assessment is inadequate, failing to provide a comprehensive understanding of likely significant effects or residual impacts.

Procedurally, there are marked deficiencies. The absence of a compliant Island Communities Impact Assessment is a breach of statutory duty as outlined in the Islands (Scotland) Act 2018. Additionally, the failure to disclose the complete Social Impact Assessment constitutes a material omission, impeding the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. Such oversights render the application unfit for determination.

Furthermore, the proposal directly contradicts the National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural places, and cultural heritage. Additionally, it fails to show that health and wellbeing impacts are acceptable and lacks the necessary evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been thoroughly assessed, leading to obscured impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal are uncertain and potentially significant. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and exhibit internal inconsistencies. The evidential threshold needed to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and obstructing a lawful conclusion that the impacts are acceptable.

Moreover, 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, 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 extensive deficiencies in information, alongside conflicts with policy and unresolved environmental risks, hinder a lawful and evidence-based decision. The competent authority is urged to refuse consent based on these grounds or to invoke the relevant regulatory provisions to compel the submission of the necessary 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 object to the wind farm proposal for the following reasons

Impact of the monstrosities, on everyone impacted by the scale of this development . This development will be a hideous blight on the entire community. All for profits whilst hiding behind a mask called green energy.

We will be directly impacted by this development. And for what???highest energy cost in Europe... it's a joke. The community investment is a very poor and minimal token gesture to try and win over opinion.

We've been to all of the community consultations and have realised one thing. They will tell you any old rubbish to try and make you think it not going to be as bad as it actually is.

3 times I've been told that they are looking into ways of not having to have the lights on unless planes are flying overhead. When grilled about this they admitted to me that it was very unlikely that they would be using this technology.

Only reason they say this to people is to win favour.

What about the impact of the hundreds of thousands of cubic meters of peat being displaced by this project. Moorland never regenerates after this. Truth is it basically dies and compacts after that kind of distress. Heather gone and replaced by rushes. As long as the ecologists get paid then spioraid can do whatever they like.

Member of Public 286

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 thorough review of the Environmental Impact Assessment Report and its supporting documents, revealing significant planning, environmental, cultural, and procedural deficiencies.

The development's location off the west side of the Isle of Lewis is characterised by its Atlantic-facing coastline, a near-pristine environment, and a strong cultural identity. Concerns arise regarding the scale, proximity, and design of the proposed development, which call into question its compatibility with statutory requirements, national policy, and the principles of sustainable development.

The application lacks an adequate evidential basis for a lawful determination. There is a notable absence of critical environmental data, while baseline information is both limited and inconsistent. Many key aspects of the proposal remain undefined. The use of a flexible design framework obscures the understanding of likely significant effects, and the reliance on unspecified mitigation measures leaves their effectiveness unassessable. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by robust evidence.

Furthermore, the proposal exhibits clear and substantive conflicts with existing policy. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially regarding biodiversity, natural places, cultural heritage, and health and wellbeing. There is insufficient demonstration that it meets national requirements to safeguard biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests required for consent, undermining the competent authority's ability to deem the development acceptable under policy considerations.

The unprecedented scale of the proposal, with large turbines situated in close proximity to the shoreline, introduces significant concerns about landscape capacity, visual dominance, and environmental impact. The combination of inadequate information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle is warranted.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report suffers from significant deficiencies, rendering it incomplete and unreliable in its portrayal of the environmental effects associated with the proposal. A flexible Project Design Envelope is employed, which lacks commitment to specific turbine dimensions, layouts, or configurations. This introduces considerable uncertainty and hampers the ability to apply a worst-case scenario consistently, ultimately undermining the integrity of the assessment. As a result, the impacts presented may not accurately reflect the actual development, denying both the public and the competent authority a comprehensive understanding of the true environmental effects.

Moreover, the application heavily relies on undefined mitigation measures, monitoring strategies, and management plans, which have yet to be clearly articulated. This approach seeks consent on the premise that environmental harm will be addressed in the future, obstructing any meaningful evaluation of the effectiveness or residual impacts of these measures. Such deferral of critical information to post-consent stages is procedurally unacceptable and conflicts with the core aims of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation be clearly established before any determination is made.

Evidential shortcomings further complicate the assessment, with gaps in baseline data, methodological limitations, and reliance on assumptions in lieu of site-specific evidence. This leads to uncertainty surrounding the scale and significance of impacts, particularly where conclusions of negligible or non-significant effects are reached without robust supporting data. The lack of comprehensive information prevents a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot be reconciled with statutory requirements.

Consequently, the application fails to satisfy the evidential threshold mandated by the Habitats Regulations, thus engaging the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, it does not demonstrate compliance with National Planning Framework 4, particularly in relation to biodiversity protection and environmental integrity, as it cannot be shown that impacts have been fully assessed or that appropriate safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The proposed project exhibits significant shortcomings in its assessment of alternatives, failing to meet the statutory requirements laid out by the Environmental Impact Assessment regime. Instead of delivering a coherent and reasoned comparison of realistic alternatives based on their environmental impacts, the application merely recounts the evolution of the project. This narrative approach does not adequately demonstrate that less harmful options have been properly identified, evaluated, and selected over more damaging solutions.

There is a clear lack of transparency and evidence in the comparison of alternative offshore locations, development scales, and design configurations. Notably, the application does not show that the developer has given serious consideration to placing turbines further offshore, which could potentially mitigate visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline and the critical importance of proximity to shore in assessing impact, the absence of such analysis prevents a conclusion that the proposed siting is the least damaging option available.

The inadequacies also extend to the assessment of cable routing and landfall, where there is insufficient evidence to suggest that alternative routes have been adequately explored to minimise impacts on sensitive receptors. This includes culturally and spiritually significant areas such as Barvas Cemetery. The lack of a clear strategy for avoidance and the absence of comparative analysis demonstrate that mitigation through design has not been employed, leading to a reliance on post-design measures to address impacts.

Consequently, the application does not prove that environmental harm has been adequately minimised through the choices made regarding site selection, layout, and infrastructure routing. This oversight constitutes a deviation from the established mitigation hierarchy and inhibits the competent authority from determining whether more suitable and less harmful alternatives are available. In the absence of a thorough assessment of alternatives, one cannot conclude that the proposal is sustainable or compliant with relevant policies.

From a policy standpoint, these deficiencies call into question the application's alignment with National Planning Framework 4, particularly concerning the protection of natural environments, cultural heritage, and community wellbeing. The omission of a structured and comparative assessment is a significant flaw that underpins the overall conclusion that the application has not been sufficiently evaluated and cannot warrant a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed application is seriously flawed in its assessment of marine ecology and protected species, leading to an incomplete and unreliable understanding of the ecological receptors in the West Lewis coastal environment. This area is known for its sensitivity and biological activity, yet the baseline data presented is insufficient. The methodologies employed do not effectively capture key aspects such as species presence, behaviour, and habitat use, undermining the assessment's ability to evaluate potential impacts accurately.

One significant oversight involves otters, classified as a European Protected Species. The application fails to adequately recognise and evaluate the otters' active use of coastal regions for foraging and movement. By not considering their core foraging range and behavioural patterns, the potential effects of construction disturbances, noise, and increased activity have not been thoroughly examined. This deficiency raises questions about the validity of conclusions drawn regarding the absence of significant effects on this species.

Additionally, the assessment of basking sharks is compromised by the use of aerial surveys, which introduces substantial detection bias, particularly in Atlantic conditions. This method is likely to result in an underestimation of their presence, especially when compared to established land-based observations that suggest these waters are frequently used by basking sharks. The failure to incorporate or adequately consider such data further contributes to an incomplete baseline and diminishes the reliability of the conclusions presented.

These methodological shortcomings mean that any conclusions regarding negligible or non-significant effects are based more on assumptions than on solid evidence. The lack of sufficient baseline data also inhibits a meaningful assessment of cumulative and indirect impacts, including variations by season and broader ecosystem interactions. This creates uncertainty about the actual risks facing 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, given that protected species have not been appropriately identified or assessed. The resulting uncertainty 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 deficiencies hinder a thorough evaluation of impacts on marine ecology and protected species, leading to

the overall conclusion that the application does not rest on a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment contains significant deficiencies that compromise its reliability. There are notable gaps in evidence and inconsistencies within the findings, undermining the conclusions reached. The Isle of Lewis is home to internationally important seabird populations, many of which are already declining. However, the application fails to adequately demonstrate that these species will not be negatively impacted. It is situated in crucial foraging areas and migratory routes, yet the implications of displacement, collision risk, and habitat loss are not thoroughly examined.

A critical contradiction arises in the application, where the developer claims no significant adverse effects while also putting forward a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This inconsistency raises doubts about the assessment's reliability and suggests that its conclusions are not substantiated by the evidence provided. Furthermore, the assessment lacks sufficient proof that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding areas is not fully considered, and reliance on modelling techniques creates uncertainty, particularly for declining species such as Kittiwakes and Fulmars. The applied methodologies are likely to underestimate mortality rates, especially when baseline data is lacking and behavioural responses are not comprehensively understood.

The proposed turbine placement within a recognised migratory corridor introduces considerable risk, effectively acting as a barrier along a primary flight path used by birds migrating between the United Kingdom and Iceland. The assessment does not adequately evaluate the long-term consequences of ongoing mortality in this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application does not fulfil the evidential requirements to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory findings, combined with gaps in data and limitations of the modelling, indicates that the necessary standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and prevents a lawful decision in favour of consent.

Additionally, the identified deficiencies demonstrate non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The failure to prove that internationally important seabird populations will not face adverse impacts places the proposal at odds with national policy. Collectively,

these weaknesses render the assessment unreliable due to its internal inconsistencies, methodological flaws, and lack of sufficient evidence. These issues hinder a thorough evaluation of impacts and lead to the conclusion that the application does not satisfy the statutory requirements needed for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity within the application is fundamentally flawed and does not recognise the West Lewis coastline as a dynamic cultural landscape. The intrinsic connections between environment, language, tradition, and community are overlooked, leading to a reductionist portrayal of heritage as a collection of isolated, static assets. This approach fails to acknowledge the ongoing social, cultural, and spiritual functions that these elements serve within the community.

The assessment inadequately treats culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are active burial grounds and places of spiritual significance, yet they are mischaracterised as static features devoid of their continued relevance and the potential impacts of development on their surroundings. This lack of understanding leads to an incomplete evaluation of cultural effects and ignores the cemeteries' vital role in community life.

Intangible cultural heritage, including the Gaelic language, local traditions, and the deep-rooted relationship between the community and its coastal environment, is also neglected in the assessment. These aspects are central to the identity of the area, yet their omission signifies a serious gap in understanding the cultural ramifications of the proposed development.

Moreover, there are significant issues regarding community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity akin to that of Indigenous Peoples, yet the process of Free, Prior and Informed Consent has not been implemented. This lack of meaningful engagement raises serious concerns about the legitimacy of the assessment and fails to adhere to established participatory principles regarding decisions that affect cultural and environmental interests.

A critical procedural oversight is the failure to conduct a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. This assessment is essential for the competent authority to fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. The absence of this assessment alone renders the determination unlawful.

From a policy standpoint, the application's deficiencies stand in stark contrast to

National Planning Framework 4, particularly regarding the protection of historic assets and sites. The neglect of both tangible and intangible heritage, along with the disregard for living cultural practices, signifies a blatant departure from policy requirements.

In summary, the combined failures to assess living heritage, intangible cultural value, community rights, and adherence to statutory obligations culminate in a significant evidential gap. The cultural impacts of the proposed development remain inadequately assessed, and the application does not provide a reliable foundation for understanding the true cultural costs associated with it.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The full Social Impact Assessment has not been published, leading to a significant gap in evidence. This lack of transparency hinders both the public and the competent authority from fully understanding the social risks identified by the developer's own research. Although summaries reveal that residents are currently facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal, the absence of the complete assessment restricts proper scrutiny of these findings.

Moreover, the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. However, these impacts have not been adequately addressed in the main application, nor given the appropriate weight they deserve. This withholding of information obscures the actual human and social cost of the development.

The significance of a thorough understanding of social, economic, and health impacts cannot be overstated, especially for developments of this magnitude that may influence community character and functioning. The lack of comprehensive data compromises the Environmental Impact Assessment process and the ability to properly weigh the benefits against the harms of the proposal.

From a policy standpoint, the application falls short of demonstrating compliance with National Planning Framework 4 regarding health and wellbeing. The evidence suggests existing adverse effects that remain undisclosed. Without the complete assessment, it cannot be shown that the development will support positive health outcomes and avoid harm.

The implications of this procedural omission are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment, which constitutes a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

In summary, the failure to disclose the complete Social Impact Assessment, alongside evidence of current adverse impacts, leads to an incomplete and unreliable evaluation. This situation obstructs a lawful determination and supports the conclusion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of visual and landscape impacts in the application is significantly lacking and does not fully capture the extent of the changes or the sensitivity of the environment it would affect. The West Lewis coastline is characterised by its open Atlantic horizon and undeveloped nature, contributing to a profound sense of remoteness. The proposal to introduce large-scale turbines near the shoreline would create an overwhelming industrial presence, leading to a permanent and irreversible alteration of this landscape.

The assessment fails to adequately depict the scale of the visual change expected from the turbines, which would dominate views from residential areas, historic locations, and popular coastal spots. This would severely impact visual amenity, detracting from the area's naturalness and sense of remoteness. Such shortcomings in the evaluation overlook the significant implications of these impacts on a landscape known for its sensitivity.

Concerns also arise regarding the methodologies used to choose and present visual viewpoints. There is evidence that these viewpoints may not encompass the most sensitive receptors or the worst-case scenarios, particularly concerning important cultural heritage sites and high-value landscapes. This raises the possibility that the actual visual impact has been underestimated, thereby questioning the reliability of the overall assessment.

Another notable deficiency is the lack of consideration for the interconnected nature of landscape, seascape, and cultural heritage. Key sites like the Calanais Standing Stones and other Scheduled Monuments are intrinsically linked to their wider landscape context, defined by visual and spatial relationships with the Atlantic horizon. By treating these sites as isolated entities, the assessment fails to recognise their interdependence, which leads to an incomplete understanding of the impacts on their setting and cultural value.

The introduction of industrial elements to the seascape would disrupt these relationships, changing the environment in which heritage sites are perceived and severing their connection to the natural horizon. This constitutes not just a visual impact but a deeper cultural and spatial disturbance that has not been sufficiently evaluated in the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, especially concerning the safeguarding of natural landscapes and historic assets. The level of change proposed is incompatible with the imperative to protect landscape character, visual amenity, and the contexts of culturally significant sites. The failure to provide a comprehensive worst-case assessment further undermines any assertions of compliance with relevant policies.

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 overwhelmingly dominant and unavoidable. Consequently, the changes envisaged would be fundamental and permanent, rendering the possibility of acceptable mitigation illusory.

In summary, the assessment does not accurately reflect the magnitude of the impacts, the environment's sensitivity, or the intrinsic connections between landscape and heritage. These deficiencies hinder a reliable evaluation and strengthen the conclusion that the proposed development is fundamentally incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline is home to clean coastal waters and vital habitats that are sensitive to sediment disturbance and contamination. However, the proposal fails to adequately address construction and pollution risks associated with substantial seabed preparation and installation works within a high-energy Atlantic environment. There are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included in the application. Instead, it relies on future mitigation and contingency measures that will only be developed post-consent, which prevents any meaningful assessment of their adequacy or effectiveness.

This lack of defined future measures is alarming, especially given the known risks such as sediment mobilisation and potential chemical or oil spills acknowledged in the application. Nonetheless, it provides insufficient detail on the strategies for preventing, controlling, or monitoring these risks. Furthermore, there is significant uncertainty regarding the scale and behaviour of sediment plumes that may arise from seabed disturbances and cable installation. Without robust modelling and well-defined management strategies, it is impossible to gauge the extent, duration, or ecological consequences of these impacts, which could adversely affect already sensitive marine species and habitats.

The absence of thorough emergency response procedures adds another layer of

concern. By postponing contingency planning until after consent is granted, the application precludes the evaluation of whether adequate safeguards are in place for addressing potential pollution incidents. This approach introduces procedural risks and weakens the ability of the competent authority to assess environmental protection measures effectively at the point of determination.

From a regulatory standpoint, deferring critical environmental safeguards conflicts with the Environmental Impact Assessment regime's requirements. Significant effects and necessary mitigation measures must be evaluated prior to consent, and the lack of such information renders a lawful determination unachievable. Additionally, the application does not demonstrate compliance with the essential policy requirements concerning environmental protection and water quality.

Overall, the combination of undefined mitigation measures, inadequate management plans, and uncertainty about potential impacts leads to a materially deficient assessment. These deficiencies hinder a thorough evaluation of construction and pollution risks and reinforce 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 application suffers from a significant shortcoming in its assessment of onshore infrastructure, which is fundamentally incomplete and overlooks the interdependence of the offshore turbines and the onshore works. This disconnected analysis obscures the full extent of both environmental and socio-economic impacts that arise from what constitutes a single integrated project.

Included in the onshore elements are critical infrastructure components, such as cabling that traverses protected moorland and the construction of a substation in proximity to Stornoway, along with access infrastructure that passes through sensitive landscapes. Notably, these activities necessitate excavation in regions of deep peat, particularly within Barvas Moor, a vital carbon store and ecologically sensitive habitat. The application fails to deliver a thorough assessment of these impacts, thereby hindering a complete understanding of the environmental footprint of the project.

The omission or postponement of the assessment concerning onshore impacts obstructs a comprehensive evaluation of cumulative effects. The Environmental Impact

Assessment process mandates that all elements of a project be reviewed in conjunction, yet the current separation of offshore and onshore factors prevents an accurate understanding of their combined impacts on peatlands, habitats, and local communities.

Furthermore, there are significant risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected under current policies. The lack of demonstration that the potential impacts on these habitats have been fully examined, or that suitable avoidance strategies have been implemented, highlights a critical evidential gap in terms of biodiversity protection.

Concerns are also raised regarding carbon balance, as the disturbance of peatland could lead to the release of stored carbon, potentially resulting in a carbon debt that contradicts the principles underpinning renewable energy development. The application does not sufficiently address this matter or prove that the overall carbon balance remains favourable.

Moreover, the proposed routing of infrastructure through active croft land brings forth the possibility of conflicts with existing land use and legal rights. The application does not provide sufficient evidence that the requisite consents or processes have been initiated, leading to uncertainties surrounding both deliverability and lawful execution of the project.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which contribute significantly to environmental quality, cultural identity, and the tourism value of the area. However, the Environmental Impact Assessment fails to include any consideration of dark skies and nocturnal wildlife, representing a critical omission. The proposal introduces permanent red aviation lighting that would be visible over long distances, creating a continuous and intrusive "wall of light" across the western horizon,

fundamentally altering the night-time environment.

The application does not 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 region's identity and the growth of tourism sectors such as astro-tourism. The absence of an analysis of these effects creates a significant gap in the overall landscape and environmental assessment.

Moreover, there is no assessment of how this lighting may affect nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to their phototactic behaviours, which can lead to disorientation and increased risks of collision. The application does not include a lighting impact assessment or a phototaxis study, neglecting to examine the potential consequences for these species or the potential increase in mortality rates.

This deficiency is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activities and related risks. Other species, including Kittiwakes, may forage or migrate at night and are similarly vulnerable to disorientation from artificial lighting, yet this risk has not been examined. The lack of site-specific night-time data leaves a critical gap in the understanding of ecological impacts.

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

From a policy standpoint, this omission is contrary to National Planning Framework 4 regarding the protection of natural places and environmental quality. It also undermines the comprehensive assessment of landscape and seascape impacts, as the night-time character is integral to the environment. Overall, the absence of any assessment of dark skies and nocturnal wildlife presents a substantial evidential gap. The deficiency of baseline data, impact modelling, and species-specific analysis renders the application incomplete and incapable of supporting a lawful determination.

TOURISM

The Isle of Lewis sees tourism as a critical component of its economy, with the sector having expanded from £65 million in 2017 to over £81.5 million, providing more than 1,000 jobs and constituting up to 16% of the local economy. Despite the significance of

this industry, the assessment of tourism impacts within the application is inadequate, particularly regarding the social and economic consequences for this key sector. It is noted that 86% of visitors are attracted by the area's scenic beauty, yet there is no quantifiable analysis of how the introduction of large-scale offshore infrastructure might influence visitor numbers, behaviours, or their overall economic contributions.

Furthermore, the assessment overlooks the crucial relationship between environmental quality and tourism, disregarding how unspoiled landscapes and dark skies enhance visitor experiences and appeal to growing markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortfall, creating a substantial gap in understanding the impacts on an increasingly important segment of the local economy.

The implications of this oversight are considerable, especially for an island community that relies heavily on tourism due to limited economic diversification. The failure to evaluate tourism impacts carries broader consequences for employment, local businesses, and the sustainability of the community. Notably, the absence of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been properly assessed, as mandated under the Islands (Scotland) Act 2018.

On a policy level, the application does not demonstrate adherence to the National Planning Framework 4, particularly regarding economic impact and the requirement for a net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector, failing to provide adequate evidence for the competent authority to evaluate the economic consequences of the proposed development.

The cumulative effect of not quantifying tourism impacts, neglecting the environmental factors that influence visitor behaviour, and overlooking the island's economic dependency results in a significant evidential gap. This deficiency hampers a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails fundamentally to meet the requirements for sustainable development as mandated by statutory duties, national policy, and evidential standards. The application echoes the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. Despite being presented under a stronger policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, it remains deficient.

There are significant gaps in baseline data, reliance on an undefined design envelope, and unspecified mitigation measures. Key impact pathways, including those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism, have been overlooked. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a full understanding of likely significant effects or residual impacts.

Procedural shortcomings are evident, notably the lack of a compliant Island Communities Impact Assessment, which breaches the statutory duty established under the Islands (Scotland) Act 2018. The omission of a full Social Impact Assessment further complicates matters, hindering the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These shortcomings are substantial enough to render the application unfit for determination.

The proposal conflicts directly with National Planning Framework 4, as it does not adequately protect biodiversity, natural places, or cultural heritage. It fails to demonstrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, largely due to the absence of tourism impact modelling. Additionally, the cumulative impact of offshore and onshore components has not been properly assessed, obscuring effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and internally inconsistent. The necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and precluding a lawful determination that impacts are acceptable.

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

Collectively, these issues render the application procedurally and substantively unfit for determination. The significant information deficiencies, combined with policy conflicts and unresolved environmental risks, impede a lawful and evidence-based decision. Therefore, the competent authority must refuse consent on these grounds or enforce the relevant regulatory provisions to obtain the missing information.

In light of these factors, I formally request that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Additional Comments

An unspoiled seascape to be scarred by this intrusion and at the same time having a significant detrimental affect on marine and bird life.

Member of Public 287

Objection To Spiorad na Mara Offshore Wind Farm

References: MD-00011742 & MD-00011743

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. A thorough review of the Environmental Impact Assessment Report and accompanying documentation has revealed 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, an area renowned for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The scale, proximity, and design of the project raise serious concerns about its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a robust evidential basis for a lawful determination. There is a notable absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Furthermore, several key components of the proposal remain undefined. The use of a flexible design framework hinders a clear assessment of potential significant effects, while the reliance on unspecified mitigation measures renders any evaluation of their effectiveness impossible. Consequently, the documentation fails to offer a comprehensive understanding of the environmental, cultural, or community impacts, and assertions regarding negligible or non-significant effects lack adequate support from reliable evidence.

There are evident and serious conflicts with established policy. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural landscapes, cultural heritage, and health and wellbeing. It does not convincingly demonstrate that national mandates to safeguard biodiversity, climate interests, and environmental integrity will be fulfilled. These conflicts are critical to the statutory tests

required for consent and undermine the competent authority's ability to determine that the development meets policy standards.

The scale of the proposed development is unprecedented for this area, with large turbines situated alarmingly close to the shoreline, which introduces substantial concerns about landscape capacity, visual dominance, and environmental repercussions. Collectively, the insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and unfit to support a lawful determination. In light of these circumstances, the precautionary principle should be invoked.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline has an open Atlantic horizon and an undeveloped character that contributes to a strong sense of remoteness. The proposal for large-scale turbines near the shoreline would create a continuous industrial presence, fundamentally changing this character and leading to a permanent alteration of the landscape.

The application fails to represent the magnitude of the visual changes that would occur. Given the scale and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations, thereby impacting visual amenity and diminishing the qualities of naturalness and remoteness. The assessment does not adequately convey the significance of this impact on such a sensitive landscape.

Methodological issues are present in the selection and representation of visual viewpoints. Evidence suggests that the chosen viewpoints may not accurately reflect the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and valuable landscapes. This raises concerns that the true magnitude of visual impact may have been understated, which calls into question the reliability of the assessment.

There is also a failure to consider the interconnected relationship between seascape, landscape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a larger landscape linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as isolated rather than recognising their interdependence, leading to 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 severing their connection to the natural horizon. This results in not just a visual impact, but a more extensive cultural and spatial harm

that has not been properly assessed in the application.

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4, which aims to protect natural places and historic assets. The scale of change is not compatible 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 weakens any claims of compliance with policy requirements.

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

Overall, the assessment inadequately represents the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings hinder a reliable evaluation and support the conclusion that the proposal is incompatible with the protection of this landscape.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the standards of sustainable development when evaluated against statutory duties, national policy, and evidential standards. This application echoes the primary issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Now, it is presented under a more robust policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are considerable deficiencies in the evidential basis required for determination. The application is marred by critical gaps in baseline data, reliance on an undefined design envelope, unspecified mitigation measures, and a failure to address significant impact pathways, particularly concerning nocturnal wildlife, the entirety of onshore infrastructure, and effects on tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a thorough understanding of likely significant effects or any residual impacts.

Procedural failures are also evident in the application. The lack of a compliant Island Communities Impact Assessment is a breach of statutory duty as stipulated in the Islands (Scotland) Act 2018, while the failure to provide a full Social Impact Assessment constitutes a material omission. These shortcomings inhibit the competent authority from properly evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

Furthermore, the proposal conflicts directly with National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural environments, and cultural heritage. The impacts on health and wellbeing are not shown to be acceptable, and there is no evidence of a net economic benefit due to the lack of tourism impact modelling. The assessment of cumulative impacts from offshore and onshore elements has not been adequately conducted, obscuring their effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain both uncertain and potentially significant. Assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and, in certain areas, inconsistent. The required evidential threshold to confirm that adverse effects can be excluded beyond reasonable scientific doubt has not been achieved, necessitating the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

Additionally, the proposal would result in 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 signify permanent effects that cannot be mitigated to an acceptable degree.

In summary, the application is both procedurally and substantively unfit for determination. The scale of informational deficiencies, alongside policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority must refuse consent on these grounds or invoke relevant regulatory provisions to demand 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 288

Objection To Spiorad na Mara Offshore Wind Farm

References: MD-00011742 & MD-00011743

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. It is informed by a thorough review of the Environmental Impact Assessment Report and the accompanying documentation, highlighting

significant planning, environmental, cultural, and procedural deficiencies. The development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The proposal raises serious concerns about its compatibility with statutory requirements, national policy, and the principles of sustainable development due to its scale, proximity, and design.

The application is deficient in providing an adequate evidential basis for a lawful determination. It lacks critical environmental data, presents limited and inconsistent baseline information, and leaves key aspects of the proposal undefined. The employment of a flexible design framework obscures understanding of potential significant effects, while the reliance on unspecified mitigation measures means their effectiveness cannot be evaluated. Consequently, the documentation does not facilitate a comprehensive or informed assessment of environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust evidential support.

Furthermore, the proposal presents clear and substantial conflicts with existing policy. It 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 fails to demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly impact the statutory tests necessary for consent, undermining the ability of the competent authority to determine the acceptability of the development from a policy perspective.

The scale of the proposal is unprecedented for this area, with large turbines proposed in close proximity to the shoreline, raising significant issues regarding landscape capacity, visual dominance, and environmental impact. Collectively, the lack of sufficient information, the reliance on undefined mitigation measures, evidential shortcomings, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. In light of these factors, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application fails to provide a reliable and comprehensive Environmental Impact Assessment Report, which is crucial for understanding the potential environmental effects of the proposal. There is an alarming lack of commitment to specific turbine dimensions, layouts, or configurations, as it employs a flexible Project Design Envelope. This approach introduces significant uncertainty and hinders the application of a worst-case scenario, which compromises the integrity of the assessment. As a result, the

impacts outlined may not correspond to the actual development constructed, leaving both the public and the competent authority uninformed about the true extent of environmental repercussions.

Moreover, the application leans heavily on mitigation measures, management plans, and monitoring strategies that remain undefined. Seeking consent based on the premise that environmental harm will be addressed later is procedurally unacceptable. This practice obstructs a meaningful evaluation of effectiveness and fails to assess residual impacts, contradicting the purpose of the Environmental Impact Assessment regime that mandates the clear establishment of likely significant effects and mitigations prior to any determination.

There are also substantial evidential deficiencies present, such as inadequate baseline data, limitations in methodology, and an overreliance on assumptions instead of site-specific evidence. Consequently, there is uncertainty about the scale and significance of impacts, particularly where negligible or non-significant effects are reported without solid supporting data. The lack of sufficient information obscures a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot align with statutory requirements.

The deficiencies in the application impede its ability to meet the evidential threshold mandated under the Habitats Regulations, which is necessary to exclude adverse effects beyond reasonable scientific doubt. This raises concerns under the precautionary principle, especially regarding protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, particularly in terms of biodiversity protection and environmental integrity, as it has not proven that impacts have been thoroughly assessed or that adequate safeguards exist.

In summary, the combination of an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data renders the Environmental Impact Assessment Report fundamentally unreliable and incomplete. These shortcomings preclude a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make an informed decision based on the information at hand.

ASSESSMENT OF ALTERNATIVES

The inadequacy of the alternatives assessment in the application fundamentally fails to meet the statutory requirements imposed by the Environmental Impact Assessment regime. Instead of delivering a structured and reasoned comparison of viable alternatives predicated on their environmental impacts, the application merely

recounts the evolution of the project. This narrative approach does not substantiate that less harmful options have been appropriately identified, evaluated, and preferred over more damaging ones.

The analysis lacks transparency and does not provide an evidence-based comparison regarding alternative offshore sites, development scales, or design configurations. Notably, the applicant has not convincingly demonstrated that the possibility of positioning turbines further offshore has been rigorously considered, despite the expectation that such a location could significantly lessen visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline highlights the crucial role of proximity to shore in determining potential impacts; thus, the absence of thorough analysis in this regard precludes any conclusion that the proposed siting is the least damaging option available.

The shortcomings extend to the assessments regarding cable routing and landfall, where there is inadequate evidence that alternative pathways have been comprehensively examined to mitigate impacts on sensitive receptors. Areas of cultural and spiritual significance, such as Barvas Cemetery, are inadequately protected due to the lack of a clear avoidance strategy and comparative analysis. This failure indicates that the principle of mitigation by design has not been implemented, with an over-reliance on post-design measures.

Consequently, the application does not adequately demonstrate that environmental harm has been minimised through careful selection of the site, layout, and routing of infrastructure. This represents a notable deviation from the established mitigation hierarchy and hampers the ability of the competent authority to ascertain the existence of less harmful and more suitable alternatives. Without a thorough assessment of alternatives, it cannot be asserted that the proposal is sustainable or compliant with relevant policies.

From a policy standpoint, this deficiency significantly undermines alignment with National Planning Framework 4, especially concerning the safeguarding of natural landscapes, cultural heritage, and the wellbeing of communities. The absence of a structured and comparative assessment constitutes a material shortcoming that leads to the overall conclusion that the application has not been sufficiently evaluated and fails to support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species is fundamentally inadequate, failing to deliver a comprehensive and trustworthy understanding of the ecological receptors present in the West Lewis coastal environment. This area is

notably sensitive and biologically active, yet the baseline data remains incomplete, while the methodologies employed are insufficient to capture the presence, behaviour, and habitat utilisation of species within this ecosystem.

A significant gap exists in the consideration of otters, which are classified as a European Protected Species. The application neglects to accurately identify and assess their use of coastal regions for foraging and movement. This oversight of their core foraging range and behavioural tendencies leads to an inadequate evaluation of potential impacts from construction disturbance, noise, and increased activity. Consequently, the conclusions drawn regarding the lack of significant effects on otters are undermined.

Further shortcomings appear in the evaluation of basking sharks, where reliance on aerial surveys results in a considerable detection bias, particularly in Atlantic conditions. This methodology likely underrepresents their presence, especially when juxtaposed with established land-based observations that show these waters are used frequently by the species. The failure to adequately incorporate or consider such data leads to a flawed baseline and diminishes the reliability of the findings presented.

These methodological shortcomings imply that the conclusions indicating negligible or non-significant effects rely more on assumptions rather than robust evidence. Furthermore, the lack of adequate baseline data obstructs a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates ambiguity regarding the actual level of risk faced by marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set forth by the Environmental Impact Assessment regime and the National Planning Framework 4, as the identification and assessment of protected species remain inadequate. The uncertainty this introduces prevents the dismissal of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these factors, granting consent would not be legally permissible.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These deficiencies hinder a thorough evaluation of impacts on marine ecology and protected species, thereby leading to the overarching conclusion that the application is devoid of a solid evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The application is fraught with significant flaws regarding its ornithological assessment, which is riddled with gaps in evidence and internal inconsistencies that undermine its

conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already experiencing decline. However, the application does not demonstrate to the required evidential standard that these species will not suffer adverse effects. Key foraging areas and migratory pathways are within the development's location, yet the assessment fails to thoroughly evaluate the implications of displacement, collision risk, or habitat loss.

A notable contradiction arises within the application, where the developer claims there are no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only necessitated where significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment and suggests that the conclusions drawn are unsupported by the underlying evidence. Additionally, the assessment lacks sufficient evidence 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 approaches introduces uncertainty, particularly concerning species like Kittiwakes and Fulmars, which are in severe decline. The methodologies employed likely underestimate mortality rates, particularly when baseline data is incomplete and behavioural responses are not adequately understood.

The placement of turbines within a recognised migratory corridor adds another layer of significant risk, effectively creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not adequately assess the long-term consequences 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 fulfil the evidential threshold required to conclude no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and precludes a lawful conclusion in favour of consent. Furthermore, the identified deficiencies signify 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 adversely affected places the proposal at odds with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the proposed development lacks adequate consideration of the West Lewis coastline as a vibrant cultural landscape, where environment, language, tradition, and community are interwoven. This application adopts an overly simplistic view, treating heritage merely as isolated assets rather than recognising their ongoing social, cultural, and spiritual relevance within the community.

A significant shortcoming is evident in the evaluation of culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places for burial and spiritual practices, yet they are mischaracterised as static features. This oversight neglects their continued use and meaning, as well as the potential impact of development on their surroundings. Consequently, the assessment provides an incomplete picture of the cultural implications, disregarding the cemeteries' vital role in community life.

Moreover, the evaluation fails to address intangible cultural heritage elements, such as the Gaelic language and traditions, along with the enduring relationship between the community and the coastal environment. These aspects are crucial to the area's identity, yet they are conspicuously missing from the assessment, representing a serious oversight. Without acknowledging these factors, the development's cultural impact remains inadequately understood.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, which embodies the characteristics of an Indigenous People, has not been afforded the Free, Prior and Informed Consent process. This lack of meaningful engagement undermines the credibility of the assessment and neglects established principles surrounding participation in decisions that affect cultural and environmental interests.

A significant procedural flaw is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The absence of this assessment prevents the competent authority from fulfilling its legal obligation to examine the social, cultural, and economic effects on the island community, rendering any determination unlawful.

From a policy standpoint, these deficiencies place the proposal at odds with the National Planning Framework 4, especially concerning the preservation of historic assets and locations. The neglect to address both tangible and intangible heritage, alongside a failure to recognise living cultural practices, constitutes a clear deviation from policy stipulations.

In summary, the failure to adequately evaluate living heritage, intangible cultural significance, community rights, and statutory obligations leads to a substantial evidential gap. The cultural impacts of the proposed development have not been properly assessed, leaving the application without a solid foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency regarding the Social Impact Assessment significantly undermines the evaluation of social impacts, health, and wellbeing associated with the proposed development. While the developer engaged with local residents through focus groups, the full report remains unpublished, creating a crucial evidential gap. This absence of information obstructs both public understanding and the competent authority's ability to gauge the extent of social risks identified through the developer's research.

Preliminary summaries reveal that residents are currently facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposal. These issues stem from direct community engagement and are not based on speculation. Nonetheless, the withholding of the complete assessment restricts thorough scrutiny of the findings and hinders the determination of their significance in the decision-making process.

Moreover, there is recognition that the proposal poses a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite this acknowledgment, such impacts have not been adequately integrated into the main application or given the appropriate consideration. By not disclosing the entire Social Impact Assessment, the true human and social costs of the development remain obscured.

This lack of transparency also undermines the Environmental Impact Assessment process, as a comprehensive understanding of social, economic, and health implications is crucial for developments of this scale. The application fails to present a complete evidential basis necessary for assessing the balance between benefits and potential harm by omitting the full dataset.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Development should promote positive health outcomes while minimising harm, yet the available evidence highlights existing adverse effects that remain inadequately disclosed. Without access to the full assessment, demonstrating adherence to this policy is not feasible.

The procedural ramifications are substantial. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a material omission in the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment framework.

In summary, the non-disclosure of the complete Social Impact Assessment, along with the evidence of existing adverse impacts, renders the assessment both incomplete and unreliable. This situation hampers a lawful determination and reinforces the assertion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its undeveloped nature, open Atlantic horizon, and a profound sense of remoteness. The introduction of large-scale turbines near the shoreline would result in a continuous industrial presence, significantly altering this unique character and leading to a permanent transformation of the landscape. The application fails to adequately reflect the magnitude of this visual change. Due to their scale and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations, thereby directly impacting visual amenity and compromising the naturalness and remoteness that define the area.

Moreover, there are significant methodological issues regarding the selection and presentation of visual viewpoints. Evidence indicates that some viewpoints may not effectively represent the most sensitive receptors or the worst-case scenarios, especially in relation to key cultural heritage sites and high-value landscapes. This suggests that the visual impact may be underestimated, which calls into question the reliability of the assessment.

Another critical deficiency is the lack of consideration for the interconnected relationships between seascape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape framework, intricately linked by visual and spatial relationships to the Atlantic horizon. The assessment incorrectly treats these assets as isolated, failing to acknowledge their interdependence and resulting in an incomplete evaluation of the impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are experienced and severing their connection to the natural horizon. This leads to not only a visual impact but also

broader cultural and spatial harm that has not been thoroughly assessed in the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, particularly regarding the safeguarding of natural places and historic assets. The scale of change is incompatible with the necessity to protect landscape character, visual amenity, and the setting of culturally significant sites. Additionally, the lack of a robust worst-case assessment further undermines any assertion of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would make their presence dominant and unavoidable, leading to a fundamental and permanent change that cannot be reduced to an acceptable level through mitigation measures.

Collectively, the assessment does not accurately represent the scale of impact, the environment's sensitivity, or the interconnectedness of landscape and heritage. These shortcomings inhibit 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 a lack of detailed management plans, which collectively prevent a robust evaluation of construction and pollution risks. The assessment of these risks is incomplete and fails to provide the necessary detail to evaluate likely environmental effects. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. This uncertainty extends to the potential effects on already identified sensitive marine species and habitats.

The proposal involves substantial seabed preparation and installation works within a high-energy Atlantic environment, yet it does not contain fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on undefined future measures to be developed post-consent, which raises significant concerns given the sensitivity of the receiving environment. The West Lewis coastline supports clean coastal waters and important habitats that are vulnerable to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it lacks sufficient detail on how these risks will be prevented, controlled, or monitored.

Compounding these issues is the absence of detailed emergency response procedures.

By deferring contingency planning to a post-consent stage, the application undermines the ability of the competent authority to assess environmental protection measures at the point of determination. This introduces procedural risk that further complicates the evaluation of appropriate safeguards to respond to pollution events.

From a regulatory standpoint, the deferral of critical environmental safeguards conflicts with the requirements of the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation measures are assessed prior to consent; the absence of this information means that a lawful determination cannot be made.

Additionally, the application does not demonstrate compliance with policy requirements regarding environmental protection and water quality. Taken as a whole, these shortcomings reinforce the conclusion that the application is incomplete and unfit for approval.

FISHERIES AND MARINE LIFE

The assessment provided regarding fisheries and marine life lacks thoroughness and fails to deliver a strong evaluation of both ecological and socio-economic impacts. 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 crucial habitats and uses can be safeguarded or sustained without causing significant disruption.

One primary concern lies in the assumption that fishing activities can be relocated without repercussions. The application lacks evidence to support the availability, accessibility, or capacity of alternative fishing grounds to absorb additional pressure. This omission is crucial, as the potential for displacement raises the risk of overfishing in other areas and could have broader economic ramifications for the local fishing fleet. An evidence-based assessment is essential to fully understand the impacts on fisheries and the livelihoods that depend on them.

Moreover, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated during construction. The high-energy hammer piling planned over an extended period is expected to disturb marine life over large areas, notably affecting species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is alarming, yet the application tends to downplay the seriousness of these effects, lacking sufficient supporting evidence.

Additionally, there is a striking inconsistency in the application concerning the necessity for licences to permit harm to European Protected Species, even as such impacts are described as negligible. This contradiction undermines the credibility of the assessment and raises substantial concerns regarding adherence to the Habitats Regulations,

particularly where harm is expected to occur to a degree that requires legal authorisation.

The assessment also neglects to account for cumulative impacts resulting from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is vital to ascertain the overall impact on marine ecosystems and the socio-economic landscape.

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

In summary, the absence of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions render the assessment both 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 onshore infrastructure is lacking and does not account for the full extent of impacts resulting from this integrated project. The offshore turbines and onshore works are connected, yet they are evaluated separately. This fragmented approach hides the true scale of environmental and socio-economic effects.

Onshore elements involve cabling across protected moorland, the construction of a substation near Stornoway, and access infrastructure through sensitive landscapes. Excavation in areas of deep peat, particularly in Barvas Moor, a significant carbon store and ecologically delicate habitat, is part of these works. The application fails to provide a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By not adequately assessing onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project be considered collectively. However, the separation of offshore and onshore elements means the combined effects on peatlands, habitats, and communities are not fully comprehended.

There are substantial risks to sensitive habitats, including machair systems and peatland environments, which enjoy policy protection. The application does not prove that impacts on these habitats have been thoroughly assessed or that appropriate

avoidance measures have been applied. This results in a clear gap in evidence regarding biodiversity protection.

Additionally, there are concerns related to carbon balance. Disturbance of peatland releases stored carbon, which could lead to a carbon debt that contradicts the aims of renewable energy development. The application does not sufficiently address this concern or show that the overall carbon balance remains advantageous.

The routing of infrastructure through active croft land could lead to conflicts with existing land use and legal rights. The application lacks evidence that the necessary consents or processes have been initiated, raising doubts about deliverability and lawful implementation.

From a policy standpoint, the failure to evaluate the project as a whole and to demonstrate 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 weakens the application.

In summary, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence on environmental and land use impacts make this part of the application incomplete and unreliable, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The omission of any assessment regarding dark skies and nocturnal wildlife represents a significant evidential gap within the Environmental Impact Assessment. The exceptionally dark skies along the West Lewis coastline are integral to the area's environmental quality, cultural identity, and tourism value. The proposal includes the introduction of permanent red aviation lighting, which would be visible over considerable distances, thereby creating a continuous and intrusive "wall of light" across the western horizon that fundamentally alters 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 oversight is particularly significant in light of the importance of dark skies to the identity of the area and the growth of tourism sectors such as astro-tourism. The failure to consider these impacts reflects a clear deficiency in the overall landscape and environmental assessment.

Moreover, there is a critical lack of evaluation regarding the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting due to phototaxis, which can lead to

disorientation and an increased risk of collision. The absence of a lighting impact assessment or a phototaxis study means that the application does not adequately assess how aviation lighting might affect these species or contribute to increased mortality rates.

This issue is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal activity or related risks. Kittiwakes, for example, may forage or migrate at night and are similarly vulnerable to disorientation caused by artificial lighting; however, this risk has not been addressed. The lack of site-specific night-time data results in a crucial gap in understanding the ecological impacts of the proposal.

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

In terms of policy, this omission contravenes the National Planning Framework 4, particularly regarding the protection of natural places and the maintenance of environmental quality. Additionally, it undermines the comprehensive assessment of landscape and seascape impacts, as the night-time character is a fundamental aspect of the environment.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm exemplifies a significant failure to meet the principles of sustainable development, as it fails to align with statutory duties, national policy, and evidential standards. This application revisits the core concerns that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was highlighted. The current proposal is put forward within a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

The application lacks a complete and reliable evidential basis for assessment, with significant gaps in baseline data. It employs an undefined design envelope and depends on unspecified mitigation measures while failing to address critical impact pathways,

including nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is inadequate, hindering a full understanding of the likely significant effects and residual impacts.

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

The proposal contradicts the National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural environments, and cultural heritage, fails to show that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit owing to the absence of tourism impact modelling. Moreover, the cumulative effects of both offshore and onshore components have not been adequately assessed, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

The 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 sometimes contradictory. The evidential standard required to rule out adverse effects beyond reasonable scientific doubt has not been fulfilled, invoking the precautionary principle and precluding a lawful determination that impacts are acceptable.

Furthermore, the proposal would cause substantial and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual relationships, and negative effects on tourism represent permanent changes that cannot be adequately mitigated.

In summary, the application is procedurally and substantively unfit for determination. The extent of information deficiencies, combined with policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority must either refuse consent on these grounds or invoke the necessary 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

Being a local resident in Bragar Isle of Lewis and a regular visitor to the gorgeous beaches on my doorstep like Dalbeg Dalmore Shawbost and Bragar itself it is lunacy to install never mind just thinking about installing these horrendous windmills in our sea just offshore all along Westide on our beautiful island - not only are they an eyesore and offer no stability or income to the island but the damage that will be done to the seabed and marine life plus also migratory birds cannot fully be accounted for - it is scandalous - who makes ludicrous decisions like these to build these eyesores and windmills of doom ? Well it certainly isn't the local residents and islanders - shame on you - it's an insult to locals - not only for this generation but for others still to come - shame on you indeed

Member of Public 289

Objection To Spiorad na Mara Offshore Wind Farm

References: MD-00011742 & MD-00011743

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted in accordance with the relevant marine licensing and Environmental Impact Assessment regimes. It addresses serious deficiencies in planning, environmental considerations, cultural impacts, and procedural aspects, derived from an analysis of the Environmental Impact Assessment Report and accompanying documentation. The development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and a strong cultural identity. The nature of the proposal, in terms of scale, proximity, and design, raises critical concerns about its alignment with statutory requirements, national policy, and the principles of sustainable development.

There is a significant lack of evidential support for a lawful determination. Essential environmental data is absent, baseline information is both limited and inconsistent, and several key elements of the proposal remain undefined. The application employs a flexible design framework, complicating the assessment of likely significant effects. Furthermore, the reliance on unspecified mitigation measures means that their effectiveness cannot be evaluated. Consequently, the documentation fails to provide a comprehensive understanding of the potential environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by adequate evidence.

Substantial conflicts with established 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 habitats, cultural heritage, and the health and wellbeing of the community. It does not satisfactorily demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These discrepancies directly impact the statutory tests necessary for consent, thereby compromising the ability of the competent authority to determine the proposal's acceptability in policy terms.

The unprecedented scale of this proposal poses significant challenges in this location, as the large turbines would be positioned in close proximity to the shoreline, leading to serious concerns regarding landscape capacity, visual dominance, and overall environmental impact. Collectively, the lack of sufficient information, dependence on undefined mitigation strategies, evidential shortcomings, and clear non-compliance with policy indicate that the application is incomplete and incapable of facilitating 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 lacking and fails to present a complete, transparent, or reliable overview of the potential environmental effects of the proposed development. The proposal employs a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations. This introduces considerable uncertainty and obstructs the consistent application of a worst-case scenario. As a result, the assessment's integrity is compromised, meaning the impacts detailed may not accurately represent the final construction, thereby limiting both public understanding and that of the competent authority regarding the true extent of environmental effects.

Moreover, the application places significant reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Consent is being requested on the premise that environmental harm will be mitigated at a later stage, which hampers any meaningful evaluation of the proposed measures' effectiveness or the assessment of residual impacts. This postponement of essential information to post-consent phases is procedurally unsound and contradicts the aims of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation measures are clearly defined prior to decision-making.

Evidential shortcomings are also present, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. These issues lead to uncertainty regarding the scale and significance of impacts, particularly 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 cannot meet statutory obligations.

Consequently, the application does not fulfil the evidential standard required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, including requirements pertaining to biodiversity protection and environmental integrity, as it cannot be established that impacts have been thoroughly assessed or that appropriate safeguards are in place.

In summary, the reliance on an unspecified design envelope, the absence of defined mitigation measures, and existing gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies obstruct a lawful and thorough assessment of environmental effects, placing the competent authority in a position where it cannot make an informed decision based on the information supplied.

ASSESSMENT OF ALTERNATIVES

The application fails to provide a comprehensive assessment of alternatives, which is crucial for compliance with the Environmental Impact Assessment regime. Instead of offering a systematic and reasoned comparison of viable alternatives grounded in environmental considerations, it presents a narrative about the project's development. This approach does not adequately demonstrate that less harmful options have been thoroughly identified, evaluated, and preferred over more detrimental solutions.

There is a lack of transparent, evidence-based comparisons concerning alternative offshore locations, development scales, or design configurations. Notably, the developer has not convincingly explored the possibility of positioning turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be mitigated. The West Lewis coastline is particularly sensitive, and the pivotal role of proximity to shore in assessing impact means that the failure to include such analysis undermines the conclusion that the proposed siting is the least damaging option available.

Furthermore, deficiencies extend to the assessment of cable routing and landfall, where insufficient evidence exists to show that alternative routes have been adequately considered to avoid or minimise impacts on sensitive receptors. This includes significant cultural and spiritual sites, such as Barvas Cemetery. The lack of a clear avoidance strategy, combined with an absence of comparative analysis, indicates that

the principle of mitigation by design has not been employed, leading to an overreliance on post-design mitigation measures.

Consequently, the application does not show that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This failure to adhere to the established mitigation hierarchy inhibits the competent authority's ability to ascertain whether more suitable and less harmful alternatives could exist. The absence of a robust alternatives assessment also raises questions about the sustainability and policy compliance of the proposal.

From a policy standpoint, these deficiencies compromise adherence to National Planning Framework 4, particularly regarding the protection of natural environments, cultural heritage, and community well-being. The omission of a structured and comparative assessment is a significant shortfall that leads to the conclusion that the application has not been sufficiently examined and cannot warrant a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species presents significant shortcomings, resulting in an incomplete understanding of the ecological receptors within the West Lewis coastal environment. This marine system is notably sensitive and biologically active. However, the baseline data is inadequate, and the methodologies employed do not effectively capture essential aspects such as species presence, behaviour, and habitat utilisation. Consequently, there is insufficient evidential support for evaluating potential impacts.

A significant oversight pertains to otters, classified as a European Protected Species, as the application does not adequately recognise or assess their active use of coastal regions for foraging and movement. The failure to account for their core foraging range and behavioural patterns leads to an incomplete assessment of potential impacts from construction disturbances, noise, and increased activity. This shortcoming undermines the conclusions regarding the absence of significant effects on this species.

Further concerns arise from the assessment of basking sharks, where reliance on aerial surveys introduces a notable detection bias, particularly in the challenging Atlantic conditions. This method is likely to underreport their presence, especially when compared to established land-based observations that show frequent activity in these waters. The disregard for such data results in a flawed baseline, weakening the reliability of the conclusions drawn.

The methodological shortcomings indicate that assertions of negligible or non-

significant effects stem from assumptions rather than solid evidence. The lack of comprehensive baseline data also hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This results in uncertainty about the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application fails to comply with the Environmental Impact Assessment regime and the National Planning Framework 4, as it has not properly identified or assessed protected species. The uncertainty generated prevents the elimination of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these factors, the granting of consent cannot be justified legally.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species, leading to the overarching conclusion that the application does not provide a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application is fundamentally flawed, containing significant gaps and inconsistencies that undermine its findings. The west coast of the Isle of Lewis is home to seabird populations of international importance, many of which are already in decline. However, the application does not sufficiently demonstrate that these species will not be adversely affected. Key foraging areas and migratory pathways are within the development site, yet the assessment fails to adequately evaluate the risks associated with displacement, collision, or habitat loss.

There is a critical contradiction in the application. The developer claims there are no significant adverse effects while also pursuing a Habitats Regulations derogation case, which is only applicable where significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment, indicating that the conclusions drawn are not firmly supported by the evidence.

The assessment lacks sufficient evidence to show that seabirds connected to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not thoroughly considered, and reliance on modelling approaches introduces uncertainty, especially for species in severe decline like Kittiwakes and Fulmars. Methodologies used are likely to underestimate mortality, particularly given the incomplete baseline data and limited understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor poses an additional risk by creating a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The application does not adequately consider the long-term implications of potential sustained mortality in this corridor or the effects on species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to ascertain no adverse effect on the integrity of protected sites. The presence of contradictory findings, alongside data gaps and modelling shortcomings, means that the standard of beyond reasonable scientific doubt has not been reached. This invokes the precautionary principle, which prevents a lawful conclusion supporting consent.

The identified deficiencies also indicate 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 at odds with national policy.

Overall, the assessment is unreliable due to its internal inconsistencies, methodological weaknesses, and lack of adequate evidence. These shortcomings inhibit a thorough 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 evaluation of cultural heritage and community identity is fundamentally flawed, failing to recognise the West Lewis coastline as a dynamic cultural landscape that intertwines environment, language, tradition, and community. The application adopts a simplistic view, treating heritage merely as a collection of isolated, static assets without acknowledging their ongoing social, cultural, and spiritual roles within the community.

A notable shortcoming is evident in the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet they are mischaracterised as static features in the assessment, which neglects their continued significance and the potential impact of development on their surroundings. This inadequate representation leads to a superficial evaluation of cultural effects and overlooks their integral role in community life.

Moreover, the assessment disregards intangible cultural heritage, including the Gaelic language, traditions, and the long-standing relationship between the community and the coastal environment. These aspects are vital to the area's identity but are

completely omitted from the evaluation, representing a critical gap. The cultural implications of the development cannot be accurately understood without addressing these factors.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population embodies a unique cultural identity that aligns with characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent undertaken. This lack of meaningful engagement undermines the validity of the assessment and fails to adhere to established principles of participation in matters affecting cultural and environmental interests.

A severe procedural flaw is the absence of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligation to assess the social, cultural, and economic impacts on the island community. This omission alone renders a lawful determination impossible.

From a policy standpoint, these deficiencies position the proposal in direct contradiction to National Planning Framework 4, particularly concerning the protection of historic assets and places. The neglect to consider both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, signifies a clear violation of policy standards.

Collectively, the shortcomings in assessing living heritage, intangible cultural value, community rights, and statutory duties create a significant evidential void. The cultural impacts of the development have not been adequately evaluated, and the application fails to establish a sufficient basis for understanding the true cultural costs associated with the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development of large-scale turbines near the West Lewis coastline raises significant concerns regarding its impact on seascape, landscape, and visual integrity. This area is characterised by an open Atlantic horizon, an undeveloped landscape, and a profound sense of remoteness. Introducing such industrial structures in close proximity to the shoreline would establish a persistent industrial presence, fundamentally altering the unique character of the environment and leading to a permanent transformation of the landscape.

The application fails to adequately capture the magnitude of the visual changes anticipated. The size and proximity of the turbines would overshadow views from nearby residential areas, historic sites, and popular coastal locations, negatively impacting

visual amenity and diminishing the area's defining characteristics of naturalness and remoteness. The existing assessment does not effectively communicate the significance of these impacts within the context of this sensitive landscape.

Concerns also arise regarding the methodology used for selecting and presenting visual viewpoints. There is evidence to suggest that the viewpoints chosen do not fully represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and valuable landscapes. This suggests a potential understatement of the visual impact, which compromises the reliability of the assessment.

Moreover, the assessment does not adequately evaluate the interconnected relationship between the landscape, seascape, and cultural heritage. Important 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 current assessment treats these heritage assets in isolation, failing to recognise their interdependence and leading to an incomplete evaluation of the impacts on their setting and cultural importance.

The proposed industrialisation of the seascape would disrupt these relationships, fundamentally changing how heritage assets are experienced and severing their connection to the natural horizon. This alteration represents not just a visual impact but also a wider cultural and spatial detriment that has not been sufficiently assessed in the application.

From a policy standpoint, the proposal is at odds with National Planning Framework 4, particularly regarding the protection of natural places and historic assets. The scale of transformation proposed conflicts with the necessity to safeguard 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 relevant policies.

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. Consequently, the changes would be fundamental and permanent, rather than reducible to an acceptable level through mitigation efforts.

Collectively, the assessment fails to represent accurately the scale of the impacts, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings inhibit a reliable evaluation and reinforce the conclusion that the proposal is fundamentally 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.

FISHERIES AND MARINE LIFE

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

A significant flaw within this proposal is the assumption that fishing activities can be relocated without any repercussions. The absence of evidence regarding the availability or suitability of alternative fishing grounds is particularly troubling. This oversight could lead to overfishing in other areas, potentially jeopardising the livelihoods of the local fishing fleet. Without a thorough and evidence-based examination, understanding the true impacts on fisheries and the communities that depend on them is impossible.

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

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is fundamentally lacking and does not account for the full range of impacts that arise from this single integrated project. The offshore turbines and the onshore works are inherently connected; however, they are evaluated separately, leading to a disjointed approach that obscures the true scale of environmental and socio-economic consequences.

Included in the onshore elements are cabling that crosses protected moorland, the construction of a substation in proximity to Stornoway, and the necessary access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, especially within Barvas Moor, a vital carbon store and ecologically delicate habitat. The application fails to deliver 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 obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively; nevertheless, the division between offshore and onshore elements results in an incomplete understanding of the combined effects on peatlands, habitats, and local communities.

There are significant risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application does not convincingly show that the impacts on these habitats have been fully evaluated or that suitable avoidance measures have been implemented. This presents a distinct evidential gap concerning biodiversity protection.

Furthermore, the routing of infrastructure across active croft land raises concerns about potential conflicts with existing land use and legal rights. The application does not supply evidence that the necessary consents or procedures have been initiated, which casts doubt on the deliverability and lawful implementation of the project.

From a policy standpoint, the failure to evaluate the project in its entirety and to demonstrate protection for peatlands, habitats, and land use interests contradicts the

National Marine Plan and the National Planning Framework 4. The inability to prove that impacts can be avoided or mitigated further weakens the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which play a vital role in the area's environmental quality, cultural identity, and tourism value. The proposed project 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. This change would fundamentally alter the night-time environment, yet the application fails to assess the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. Given the significance of dark skies to the region's identity and the emerging tourism sector of astro-tourism, this omission is especially troubling.

Moreover, there is no evaluation of how this lighting would affect nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are highly sensitive to artificial lighting due to phototaxis, which can result in disorientation and increased collision risk. The application lacks a lighting impact assessment or a phototaxis study, failing to examine how aviation lighting might impact these species or contribute to mortality rates.

Additionally, the ornithological assessment relies on daytime survey data, which does not capture nocturnal activity or the associated risks. Other species, such as Kittiwakes, which may forage or migrate at night, are also vulnerable to disorientation caused by artificial lighting, yet this risk remains unassessed. Without site-specific night-time data, there is a critical gap in understanding the ecological impacts.

The failure to consider nocturnal impacts raises significant concerns about whether protected species or designated sites could be adversely affected. The evidential standard required to demonstrate the absence of adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and thereby obstructing a lawful determination.

From a policy standpoint, the absence of this assessment conflicts with the National Planning Framework 4 regarding the protection of natural places and the quality of the environment. Furthermore, 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 assessment concerning dark skies and nocturnal wildlife creates a substantial evidential gap. The absence of baseline data, impact modelling, and species-specific analysis means the application is incomplete and cannot support a lawful determination.

TOURISM

The application for the proposed development presents a significant deficiency in its assessment of tourism impacts, neglecting to evaluate the economic and social consequences on a vital sector of the Isle of Lewis economy. Tourism is intrinsically linked to the region's wild coastline, nearly untouched landscapes, dark skies, and overall sense of remoteness. Although the application notes that 86% of visitors are motivated by the scenery, it fails to provide a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contributions of tourism.

Tourism in the area has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, and currently supports more than 1,000 jobs, comprising up to 16% of the island's economy. Nevertheless, the application does not explore how the anticipated industrialisation of the seascape and a decline in environmental quality may affect Tourism Gross Value Added or broader economic resilience. This lack of analysis inhibits the ability to ascertain whether the development would yield a net economic benefit or jeopardise an established and expanding sector.

Furthermore, the application fails to adequately consider the significance of environmental quality in fostering tourism. This includes the essential role of unspoiled landscapes and dark skies in enhancing visitor experiences, as well as the rising demand for nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment only exacerbates this shortcoming, resulting in a critical gap in understanding the potential impacts on this recognised and growing segment of the local economy.

For an island community with limited economic diversification, the insufficient evaluation of tourism impacts bears broader implications for employment, local businesses, and community sustainability. The lack of a compliant Island Communities Impact Assessment means that these economic vulnerabilities remain unexamined, as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National

Planning Framework 4, especially concerning economic impact and the need to illustrate net benefit. It contradicts strategic objectives that designate tourism as a priority growth sector and fails to furnish adequate evidence for the competent authority to evaluate the economic repercussions of the proposal.

Collectively, these shortcomings—including the failure to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and consider the economic dependency of the island—culminate in a significant evidential gap. This gap hampers a thorough assessment of economic effects and leads to the conclusion that the application remains incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal represents a significant failure to meet the standards of sustainable development when evaluated against statutory requirements, national policy, and evidential benchmarks. This application mirrors the core issues that resulted in the denial of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. Presenting this proposal under a stronger policy framework, which emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, does not rectify its inherent flaws.

There is a lack of a complete and reliable evidential basis for determination in the application. Critical gaps exist in the baseline data, and the use of an undefined design envelope raises concerns. The reliance on unspecified mitigation measures and the omission of significant impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism, further compromise the application. Consequently, the Environmental Impact Assessment is incomplete, hindering a thorough understanding of likely significant effects and residual impacts.

Procedural shortcomings are also evident. The failure to produce a compliant Island Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018. Moreover, the omission of the complete Social Impact Assessment represents a substantial gap in the information provided. These deficiencies prevent the competent authority from adequately assessing the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal stands in direct opposition to the National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural landscapes, and cultural heritage. Furthermore, it fails to show that the health and wellbeing impacts are acceptable and cannot substantiate a net economic benefit due to the lack of tourism impact modelling. Additionally, the cumulative impacts of both offshore and onshore

components have not been sufficiently assessed, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

The environmental risks associated with this proposal remain uncertain and potentially significant. Assessments of marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also inconsistent in several areas. The evidential threshold required to discount adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful determination of acceptable impacts.

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

When considered collectively, these procedural and substantive deficiencies render the application unfit for determination. The considerable information gaps, policy conflicts, and unresolved environmental risks prevent a lawful, evidence-based decision. Therefore, the competent authority must either refuse consent on these grounds or invoke the relevant regulatory provisions to demand the submission of the missing information.

In light of these concerns, 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 290

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.

ORNITHOLOGY AND SEABIRD IMPACTS

The application for the proposed development is fundamentally flawed, particularly in its ornithological assessment, which contains significant gaps in evidence and internal inconsistencies that compromise its conclusions. The site is situated along the west coast of the Isle of Lewis, an area recognised for its internationally important seabird populations, many of which are already in decline. However, the application fails to adequately demonstrate that these species will not suffer adverse effects. Key foraging areas and migratory pathways are within the development's location, yet the assessment does not properly evaluate the risks associated with displacement, collision, or habitat loss.

A glaring contradiction is present in the application, as the developer claims there will be no significant adverse effects while simultaneously proposing a Habitats Regulations

derogation case, which is typically invoked only in instances where significant harm is anticipated. This inconsistency raises serious questions about the assessment's reliability and suggests that the conclusions drawn are not supported by robust evidence. Furthermore, the assessment lacks sufficient evidence to ensure that seabirds linked to protected sites like the Lewis Peatlands and St Kilda will remain unaffected. The crucial nature of these feeding grounds has not been fully acknowledged, and the reliance on modelling introduces uncertainty, particularly for species such as Kittiwakes and Fulmars, which are in severe decline. The methodologies used are likely to underestimate mortality rates, especially in light of incomplete baseline data and a lack of comprehensive understanding regarding behavioural responses.

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

From a regulatory standpoint, the application fails to meet the evidential threshold necessary to assert that there will be no adverse effect on the integrity of protected sites. The presence of contradictory findings, along with data gaps and modelling deficiencies, indicates that the standard of beyond reasonable scientific doubt has not been fulfilled. This invokes the precautionary principle, thereby preventing a lawful conclusion in favour of consent.

The 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 impacted places the proposal in direct opposition to national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development fails to adequately assess cultural heritage and community identity, particularly regarding the West Lewis coastline, which is a living cultural landscape. The connection between the environment, language, tradition, and community is overlooked in the application, which adopts a reductive view of heritage as isolated and static assets, rather than considering their dynamic social, cultural, and

spiritual roles within the community.

Significant deficiencies arise in the treatment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active locations for burial and spiritual practices, yet they are classified in the assessment as static features, neglecting their ongoing use and significance. This mischaracterisation leads to an incomplete evaluation of cultural effects and fails to appreciate the cemeteries' role in community life.

Moreover, the application does not address intangible cultural heritage elements, which include the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These aspects are vital to the area's identity, yet they are entirely omitted from the assessment, resulting in a substantial oversight. Without considering these elements, the true cultural impact of the development cannot be comprehensively understood.

There are also critical issues concerning community rights and engagement. The Gaelic-speaking population, which embodies distinct characteristics of an Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the assessment's credibility and does not align with the established principles regarding participation in matters that affect cultural and environmental interests.

Furthermore, the absence of a compliant Island Communities Impact Assessment represents a significant procedural failure, as mandated by the Islands (Scotland) Act 2018. This omission prevents the competent authority from fulfilling its legal responsibilities to evaluate the social, cultural, and economic repercussions on the island community, thereby hindering a lawful determination of the application.

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

In conclusion, the failure to adequately consider living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential gap. The assessment does not properly evaluate the cultural impacts of the development, nor does it provide a sufficient basis for understanding the true cultural costs associated with the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual, landscape, and seascape impacts is inadequate and does not sufficiently capture the sensitivity of the environment or the extent of change that would occur. The coastline of West Lewis is characterised by its unspoilt Atlantic horizon, undeveloped nature, and profound sense of remoteness. Introducing large-scale turbines near the shoreline would create a prominent industrial presence, fundamentally altering this character and resulting in an irreversible transformation of the landscape.

The application fails to represent the magnitude of the visual change accurately. Due to the scale and closeness of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations. This would negatively affect visual amenity and undermine the qualities of naturalness and remoteness. The assessment does not adequately communicate the significance of this impact within such a sensitive landscape context.

Methodological issues arise concerning the choice and presentation of visual viewpoints. There are indications that the viewpoints selected do not adequately represent the most sensitive receptors or the worst-case scenarios, especially regarding important cultural heritage sites and valuable landscapes. This underrepresentation raises concerns that the magnitude of visual impact has been downplayed, thereby affecting the reliability of the assessment.

Moreover, there is a failure to consider the interconnected nature of landscape, seascape, and cultural heritage. Notable sites, such as the Calanais Standing Stones and other Scheduled Monuments, are interconnected within a wider landscape, sharing visual and spatial relationships with the Atlantic horizon. The assessment treats these heritage assets in isolation rather than acknowledging their interdependence, leading to an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are perceived and severing their connection to the natural horizon. This signifies not only a visual impact but also a broader cultural and spatial harm that the application fails to address adequately.

From a policy standpoint, the proposal is at odds with National Planning Framework 4, particularly concerning the safeguarding of natural areas and historic assets. The extent of change conflicts with the requirements to protect landscape character, visual amenity, and the contexts of culturally significant sites. The lack of a thorough worst-case scenario assessment further weakens any assertions of policy compliance.

It is evident that the impacts identified are not amenable to effective mitigation. Given the scale, height, and proximity of the turbines, their presence would be dominant and inescapable. Consequently, the resulting change would be both fundamental and permanent, rather than reducible to an acceptable level through mitigation.

Overall, the assessment does not accurately portray 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 contradicts the preservation of this landscape.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fundamentally fails to meet the criteria of sustainable development as evaluated against statutory obligations, national policies, and evidential standards. This application echoes the critical issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was highlighted. Presenting it now under a policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing does not mitigate these concerns.

Moreover, the application lacks a complete and reliable evidential basis for decision-making. There are significant deficiencies in baseline data, the utilisation of an undefined design envelope, reliance on unspecified mitigation measures, and the omission of vital impact pathways such as nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, hindering a full understanding of potential significant effects or residual impacts.

Additionally, clear procedural shortcomings exist. The failure to submit a compliant Island Communities Impact Assessment breaches statutory duties as outlined in the Islands (Scotland) Act 2018, and not disclosing the full Social Impact Assessment is a substantial omission. These gaps inhibit the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal conflicts directly with National Planning Framework 4. It does not demonstrate effective protection of biodiversity, natural environments, and cultural heritage, fails to establish that health and wellbeing impacts are acceptable, and cannot provide evidence of a net economic benefit as it lacks tourism impact modelling. Additionally, the cumulative impacts of both offshore and onshore elements have not been adequately assessed, thereby obscuring the effects on peatlands,

carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. The evaluations regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and contain internal inconsistencies. The evidential standard necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, activating the precautionary principle and obstructing a lawful conclusion that impacts are acceptable.

Furthermore, the proposal would lead to considerable 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 impacts on tourism signify permanent effects that cannot be sufficiently mitigated.

In summary, the application is procedurally and substantively unfit for determination. The extent of informational deficiencies, alongside policy conflicts and unresolved environmental risks, hampers a lawful and evidence-based decision. The competent authority must refuse consent on these grounds or activate the relevant regulatory provisions 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.

Additional Comments

I live in Shader, I was born here 40 years ago, I can trace my ancestors back to living here to the 1700's. My culture, heritage and sense of belonging and connection to this land go as deep as they could. I live half a mile from Shader shore, a beautiful place rich with wildlife, seals, otters, sea birds and fish.

Along the cliff tops lie the ruins of an old graveyard and temple, dating further back than records can be sure, it is a site that Historic Scotland have deemed so precious that nothing can be placed on the land, not even a bench! Looking out by the shore are the ruins of black houses and old stone walls that did belong to my family and relatives, there is a well that the village used and where my grandparents collected water. The river that runs into the sea, has some large flat stones perfect for when the women used to wash the thick blankets and leave them out to dry in the sun. This little village has always lived its life round the shore, surviving on fishing, seaweed and even picking winkles when needed. It is not just a 'nice view' it's our identity and home for generations and generations to come.

My children have spent their childhoods visiting the shore, and like myself and their great great grandparents they now say the shore is their favourite place to go for peace

and connecting with nature. The sunsets over the horizon at Shader shore, on a clear summer evening you can sometimes see the rare phenomenon of a green flash just as it sets, we have learnt to recognise when this will happen and gather to watch it. In the winter I still take my 90 year old granny to the shore to watch the waves crashing, she used to play at the shore as a child and it's her favourite place to come and sit for memories and a feeling of home. We cherish our beautiful Island and its surrounding sea. To see our lovely land that has been kept free from industry and exploitation for money being used and disrupted to tick government quotas and not even benefit the people from this part of the island is deeply disturbing for us. We want to preserve a sanctuary, a place of natural beauty, its wildlife but also the place where for the last few hundred years our families have lived and brought up their children . I am objecting not only on behalf of myself but my two children. My daughter is 13, in her words " They can't do that, it will change everything" We are an island, not densely populated but our voices matter, we deserve to be heard. No one from Ness to Callanish wants these giant ugly structures of the ones proposed on the land.

I object wholeheartedly!