Member of the public 1045

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the marine licensing and Environmental Impact Assessment frameworks. A thorough review of the Environmental Impact Assessment Report and accompanying documents has revealed significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. This development is positioned off the west coast of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. The scale and design of this proposal, combined with its proximity to the shoreline, raise serious concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks an adequate evidential basis for a lawful decision. There is critical environmental data that is absent, baseline information that is inconsistent and limited, and numerous key aspects of the proposal that remain undefined. The flexible design framework employed inhibits a clear assessment of likely significant effects. Furthermore, the reliance on unspecified mitigation measures means that their effectiveness cannot be evaluated. Consequently, the documentation does not facilitate a comprehensive understanding of the potential environmental, cultural, or community impacts, and claims of negligible or non-significant effects are unsupported by solid evidence.

There are evident and serious policy conflicts present in the proposal. It appears to be at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The proposal fails to demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. These conflicts directly challenge the statutory tests necessary for consent and weaken the capacity of the competent authority to determine the development's acceptability within policy frameworks.

The unprecedented scale of this proposal, with large turbines situated in close proximity to the shore, raises significant concerns regarding landscape capacity, visual dominance, and environmental repercussions. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear non-compliance with policy illustrates that the application is incomplete and unfit for lawful determination. In light of these factors, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The reliance on an undefined design envelope, the absence of specified mitigation measures, and gaps in baseline data severely compromise the Environmental Impact Assessment Report, making it unreliable and incomplete. This combination of deficiencies leads to an assessment that cannot lawfully or robustly evaluate environmental effects, thereby leaving the competent authority unable to make an informed decision based on the provided information.

The application places undue emphasis on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent under these circumstances means that any environmental harm is intended to be addressed later, which hampers the ability to effectively evaluate these measures or assess any residual impacts. Such deferral of critical information to post-consent stages is procedurally unacceptable, contradicting the essential aim of the Environmental Impact Assessment regime that mandates clear establishment of significant effects and mitigation prior to any determination.

There exist substantial evidential deficiencies, including missing baseline data and limitations in methodology, along with an over-reliance on assumptions rather than site-specific evidence. These issues generate uncertainty around the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are presented without robust supporting data. The lack of sufficient information inhibits a thorough understanding of cumulative and worst-case impacts and fosters scientific uncertainty that cannot be aligned with statutory requirements.

The application does not meet the evidential threshold required under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, failing to show that impacts have been fully assessed or that appropriate safeguards are in place.

The deficiencies in the Environmental Impact Assessment Report, stemming from the flexible Project Design Envelope that lacks commitment to specific turbine dimensions and configurations, introduce significant uncertainty. This uncertainty ultimately undermines the integrity of the assessment and obscures the actual environmental impacts from both the public and the competent authority, leaving a critical gap in understanding the true extent of potential effects from the development.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives is fundamentally flawed and does not satisfy the statutory requirements of the Environmental Impact Assessment regime. Rather than offering a structured and reasoned comparison of realistic alternatives based on environmental effects, the application presents a narrative of project development that fails to show that less harmful options have been adequately identified and assessed in favour of more damaging solutions.

There is a significant lack of transparent, evidence-based comparisons of alternative offshore locations, development scales, or design configurations. Notably, the application does not illustrate that the developer has given serious consideration to placing turbines further offshore, where visual, ecological, and coastal impacts would likely be lessened. The West Lewis coastline's sensitivity, coupled with the critical importance of proximity to shore in assessing impact, means that the absence of such analysis renders it impossible to conclude that the proposed siting is the least damaging option.

These inadequacies extend to the assessment of cable routing and landfall, where there is insufficient evidence that alternative routes have been thoroughly explored to avoid or mitigate impacts on sensitive receptors. This includes culturally and spiritually significant areas such as Barvas Cemetery. The lack of a clear avoidance strategy, along with the absence of comparative analysis, suggests that mitigation by design has not been employed, with an overreliance on post-design mitigation measures instead.

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

From a policy standpoint, this shortcoming undermines compliance with National Planning Framework 4, particularly concerning the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission that supports the overall conclusion that the application has not undergone adequate evaluation and cannot sustain a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of community identity and cultural heritage is fundamentally lacking. It fails to recognise the West Lewis coastline as a living cultural landscape where environment, language, tradition, and community are interconnected. The application simplifies heritage into isolated, static assets, neglecting their ongoing social, cultural, and spiritual roles within the community.

A major shortcoming is evident in how culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are treated. These locations are active places of burial and spiritual practice. However, the assessment categorises them as static features and does not consider their continued use or the impact of development on their setting. This mischaracterisation leads to an incomplete evaluation of cultural effects and overlooks their importance in community life.

The assessment also ignores intangible cultural heritage, including the Gaelic language, traditions, and the community's long-standing connection to the coastal

environment. These aspects are crucial to the area's identity yet are entirely absent from the evaluation, which is a significant oversight. Without considering these elements, the true cultural impact of the development remains unclear.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity and recognised characteristics of an Indigenous People. However, there has been no process of Free, Prior and Informed Consent undertaken. This lack of meaningful engagement undermines the validity of the assessment and does not reflect established principles of participation in decisions that affect cultural and environmental interests.

A critical procedural failure is 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 obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone prevents a lawful determination.

From a policy viewpoint, these deficiencies place the proposal in direct conflict with the National Planning Framework 4, particularly regarding the protection of historic assets and places. The neglect to consider both tangible and intangible heritage, as well as living cultural practices, marks a clear deviation from policy requirements.

In summary, the failure to 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 adequately evaluated, and the application does not offer a sufficient basis for understanding the true cultural cost of the proposal.

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's reliance on undefined future measures raises serious concerns, particularly in light of the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and significant habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on prevention, control, or monitoring strategies.

Furthermore, there is a lack of clarity regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. The absence of robust modelling and well-defined management strategies makes it impossible to ascertain the extent, duration, or ecological repercussions of these impacts. This uncertainty also applies to potential effects on marine species and habitats identified as sensitive in the broader assessment.

The assessment of construction and pollution risks is incomplete and lacks the necessary detail to evaluate likely environmental effects. The proposal entails significant seabed preparation and installation works within a high-energy Atlantic environment, yet it does not include fully developed Construction Environmental

Management Plans or Pollution Prevention Plans. Instead, it defers mitigation and contingency measures to a post-consent stage, hindering any meaningful assessment of their adequacy or effectiveness.

The deficiency of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application inhibits the evaluation of whether appropriate safeguards are established to respond to pollution incidents. This procedural risk undermines the competent authority's capacity to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contravenes the requirements of the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation be assessed before consent; without such information, a lawful determination cannot be achieved. The application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, detailed management plans, and clarity regarding potential impacts renders the assessment materially deficient. These inadequacies obstruct a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding dark skies and nocturnal wildlife represents a significant gap within the Environmental Impact Assessment. 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. The proposed introduction of permanent red aviation lighting, which would be visible over long distances, creates an intrusive “wall of light” effect across the western horizon. This alteration to the night-time environment is not addressed in terms of its impact on visual amenity, landscape character, or the experiences of both residents and visitors. Given the relevance of dark skies to local identity and emerging sectors such as astro-tourism, this omission is particularly concerning.

Moreover, the application neglects to evaluate the impacts on nocturnal wildlife, which is crucial given that species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are highly susceptible to artificial lighting. Phototaxis can lead to disorientation and increased risk of collision for these species. The absence of any lighting impact assessment or phototaxis study means there is no consideration of how aviation lighting could affect these species and potentially increase mortality rates.

This critical oversight is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which fails to capture nocturnal activities and related risks. Species like Kittiwakes, which might forage or migrate at night, are equally at risk of disorientation from artificial lighting; however, this risk remains unassessed. Without site-specific night-time data, a fundamental understanding of ecological

impacts is lacking.

Consequently, without a thorough assessment of nocturnal impacts, it becomes impossible to ascertain whether protected species or designated sites may be adversely affected. The evidential standard required to rule out adverse effects beyond reasonable scientific doubt cannot be satisfied, invoking the precautionary principle and thereby hindering a lawful determination.

From a policy perspective, this omission contradicts National Planning Framework 4 concerning the protection of natural places and environmental quality. It also diminishes the overall evaluation of landscape and seascape impacts since the character of night-time environments is an essential aspect of the overall landscape.

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

TOURISM

The assessment of tourism impacts related to the application is inadequate and overlooks the economic and social effects on a vital sector of the Isle of Lewis economy. Tourism relies heavily on the island's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness. The application notes that 86% of visitors are attracted by the scenery, yet it fails to provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution of tourism.

Tourism has seen substantial growth, rising from £65 million in 2017 to over £81.5 million, supporting over 1,000 jobs and accounting for up to 16% of the island's economy. Nevertheless, the application does not consider how the industrialisation of the seascape and the loss of environmental quality could affect Tourism Gross Value Added or the broader economic resilience of the area. Without this analysis, it remains unclear whether the development would yield a net economic benefit or negatively impact an established and expanding sector.

Furthermore, the assessment neglects to address the significance of environmental quality in enhancing tourism, including the value of unspoiled landscapes and dark skies to visitor experiences. This is particularly relevant for emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a considerable gap in understanding how the proposal could affect this recognised and developing aspect of the local economy.

In an island community that faces challenges in economic diversification, the failure to evaluate tourism impacts carries broader implications for employment, local businesses, and community sustainability. The absence of a proper Island Communities Impact Assessment signifies that these economic vulnerabilities have

not been assessed as mandated by 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 need to illustrate net benefit. It contradicts strategic goals that identify tourism as a priority growth sector and lacks sufficient evidence for the competent authority to assess the economic repercussions of the proposal.

In summary, the failure to quantify tourism impacts, analyse environmental factors affecting visitor behaviour, and acknowledge the island's economic dependence leads to a significant evidential void. This hampers a thorough evaluation of economic effects and supports the assertion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the standards for sustainable development. It does not satisfy statutory duties, national policy, or evidential standards. Similar issues were present in the rejected 2008 Lewis Wind Power proposal, where the level of industrialisation was deemed unacceptable. The current application is under a stronger policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it still falls short.

There are significant gaps in the information provided. The application relies on an undefined design envelope and on unspecified mitigation measures, which are critical oversights. Essential impact pathways have been omitted, such as those concerning nocturnal wildlife, complete onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete and does not allow for a thorough understanding of potential significant effects or residual impacts.

Procedural deficiencies are evident, particularly the lack of a compliant Island Communities Impact Assessment, which breaches statutory obligations under the Islands (Scotland) Act 2018. The failure to present a 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 contradicts the National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural areas, and cultural heritage. Furthermore, it fails to show that health and wellbeing impacts are acceptable and cannot provide evidence of a net economic benefit due to the lack of tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been assessed properly, leaving significant impacts on peatlands, carbon balance, habitats, and crofting land obscured.

Environmental risks related to marine ecology, seabirds, protected species, and marine mammals remain uncertain and potentially significant. The assessments are

incomplete and sometimes inconsistent. The evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been achieved, necessitating the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The numerous information deficiencies, combined with policy conflicts and unresolved environmental risks, obstruct a lawful, evidence-based decision. Therefore, the competent authority should refuse consent or require the submission of the missing information. A formal request is made for the complete refusal of the Spiorad na Mara Offshore Wind Farm application.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 04FBE4C5

Member of the public 1046

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. The objection is rooted in a review of the Environmental Impact Assessment Report and associated documentation, which reveals significant deficiencies in planning, environmental, cultural, and procedural areas. The proposed development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline and rich cultural identity, as well as its near-pristine environment.

The application lacks sufficient evidence for a lawful decision. Important environmental data is absent, and the baseline information provided is both limited and inconsistent. Key elements of the proposal remain undefined. The use of a flexible design framework obscures an understanding of the likely significant effects, while unspecified mitigation measures hinder any assessment of their potential effectiveness. Consequently, the provided documentation fails to offer a comprehensive understanding of the environmental, cultural, or community impacts, making the claims of negligible or non-significant effects unsupported.

Furthermore, there are notable conflicts with established policies. 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 sufficiently demonstrate adherence to national requirements to protect biodiversity, climate interests, and environmental integrity. These issues directly impact the statutory tests required for consent and challenge the competent authority's ability to assess the development's acceptability within policy frameworks.

The scale of the proposal is unprecedented for this area, with large turbines situated near the shoreline, raising serious concerns about landscape capacity, visual dominance, and environmental impacts. The combination of inadequate information, reliance on undefined mitigation measures, evidential weaknesses, and clear policy violations indicates that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate and lacks a full, transparent, and reliable account of the potential environmental effects associated with the proposal. The employment of a flexible Project Design Envelope, which lacks a commitment to specific turbine dimensions, layouts, or configurations, introduces

substantial uncertainty. This uncertainty hinders the consistent application of a worst-case scenario, thereby compromising the integrity of the assessment. As a result, the impacts presented may not accurately reflect the actual development constructed, which obstructs both the public and the competent authority from comprehending the true extent of the environmental effects.

Furthermore, the application places considerable reliance on yet-to-be-defined mitigation measures, monitoring strategies, and management plans. Consent is thus being sought with the understanding that any environmental harm will be addressed at a later stage, which precludes a 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 is contrary to the objectives of the Environmental Impact Assessment regime, which mandates that significant likely effects and mitigation are clearly established prior to any determination.

There are also major evidential shortcomings, such as gaps in baseline data, methodological limitations, and a dependence 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 made without robust supporting data. The lack of adequate information inhibits a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory requirements.

Consequently, the application does not meet the evidential threshold required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation activates the precautionary principle, particularly regarding protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, including requirements related to biodiversity protection and environmental integrity, as it has not been shown that impacts have been comprehensively assessed or that appropriate safeguards are in place.

Collectively, the reliance on an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies prevent a lawful and thorough assessment of environmental effects and indicate that the competent authority is not equipped to determine the application based on the information available.

ASSESSMENT OF ALTERNATIVES

The proposed development raises significant concerns regarding the adequacy of the alternatives assessment, which fails to meet the requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of feasible alternatives based on environmental consequences, the application merely recounts the evolution of the project. This method does not adequately demonstrate that less damaging options have been properly evaluated and chosen over more

harmful solutions.

Moreover, there is a lack of transparent, evidence-based comparisons concerning alternative offshore locations, development scales, or design configurations. Specifically, the application does not show that the developer has genuinely contemplated positioning turbines further offshore, where visual, ecological, and coastal impacts would probably be diminished. Considering the delicate nature of the West Lewis coastline and the critical role of proximity to shore in assessing impacts, the failure to perform such an analysis prevents any conclusion that the proposed location is the least damaging option.

These shortcomings are also evident in the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been explored thoroughly to reduce impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The absence of a clear avoidance strategy and the lack of comparative analysis suggest that mitigation through design has not been properly considered, relying instead on measures to mitigate impacts after the design has been established.

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

From a policy standpoint, this deficiency undermines alignment with National Planning Framework 4, particularly regarding the protection of natural environments, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission that contributes to the overall conclusion that the application has not undergone adequate evaluation and cannot facilitate a lawful decision.

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.

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally significant seabird populations, many of which are already in decline. The ornithological assessment associated with the development proposal is fundamentally flawed, lacking crucial evidence and containing internal contradictions that undermine its conclusions. It fails to demonstrate that these vital species will not be adversely impacted, particularly as the development sits within key foraging areas and migratory routes. There is inadequate evaluation of the implications regarding displacement, collision risk, and habitat loss.

Compounding this issue is a glaring inconsistency within the application; the developer asserts that there are no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only warranted in scenarios where significant harm is anticipated. This contradiction raises serious doubts about the

reliability of the assessment, indicating that its conclusions are unsupported by the available evidence. The assessment does not convincingly show that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected, and it fails to properly account for the significance of these feeding grounds. The reliance on modelling techniques injects further uncertainty, especially concerning species like Kittiwakes and Fulmars that are in severe decline. The methodologies used are likely to underestimate mortality rates, particularly when baseline data is lacking and behavioural responses are not fully understood.

Moreover, the proposed siting of turbines within a recognised migratory corridor creates an additional and substantial risk, acting as a barrier along a primary flight path for species migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term ramifications of sustained mortality within this corridor, nor does it consider 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 effects on the integrity of protected sites. The presence of contradictory conclusions, coupled with data gaps and modelling inadequacies, means the standard of beyond reasonable scientific doubt has not been met. This situation necessitates the application of the precautionary principle, which precludes a lawful conclusion in favour of consent.

Additionally, the identified deficiencies represent a failure to comply 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 face adverse effects places the proposal in direct contradiction to national policy.

In summary, the assessment is rendered unreliable due to its internal inconsistencies, methodological flaws, and a lack of sufficient evidence. These deficiencies obstruct a robust evaluation of potential impacts and lead to the overall conclusion that the application does not fulfill the statutory requirements necessary for a proper determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment concerning cultural heritage and community identity is deeply flawed and overlooks the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are intertwined. The application simplifies heritage to a collection of isolated, unchanging features and neglects to recognise their ongoing social, cultural, and spiritual significance within the community.

Particularly concerning is how culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas, are treated. These locations serve as active burial and spiritual sites, yet the assessment fails to acknowledge their continued use and

significance, instead reducing them to static features. This misrepresentation leads to an inadequate understanding of cultural impacts and ignores their integral role in community life.

Moreover, the application neglects to evaluate intangible cultural heritage such as the Gaelic language, local traditions, and the enduring relationship the community has with the coastal environment. These elements are vital to the area's identity and their exclusion signifies a considerable oversight. Without incorporating these factors, the true cultural impact of the development remains unmeasured.

Concerns also arise regarding community engagement and rights. The Gaelic-speaking population possesses a unique cultural identity that aligns with Indigenous Peoples, yet there has been no Free, Prior and Informed Consent process conducted. This lack of genuine engagement undermines the validity of the assessment and fails to honour established principles of participation in decisions that affect cultural and environmental matters.

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 means that the responsible authority cannot meet its legal obligation to evaluate the social, cultural, and economic ramifications for the island community. This alone hinders a lawful decision.

From a policy standpoint, these deficiencies contradict the National Planning Framework 4, specifically 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, clearly deviates from policy mandates.

In summary, the neglect to assess living heritage, intangible cultural value, community rights, and statutory obligations culminates in a considerable evidential void. The cultural ramifications of the development have not been thoroughly examined, and the application fails to furnish a solid foundation for understanding the genuine cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The absence of the full Social Impact Assessment is a glaring shortcoming that compromises the integrity of the evaluation process. Despite the developer commissioning this assessment, including engaging with local residents through focus groups, the complete report has not been made available. This lack of transparency creates a significant evidential gap, hindering both public understanding and the competent authority's ability to grasp the full range of social risks identified by the developer’s own research.

It has been reported that residents are currently facing measurable stress, anxiety, and worry due to the scale and proximity of the proposed development. These concerns are grounded in direct engagement and are not merely speculative. Yet, without access to

the full assessment, it is impossible to scrutinise these findings properly, and this limits the capacity to evaluate their importance in the decision-making process.

Moreover, there is a sense that the proposal poses a direct threat to community identity and cohesion, with findings highlighting "cultural loss" identified by the developer. Unfortunately, these serious impacts have not been adequately incorporated into the main application nor 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 situation not only undermines the Environmental Impact Assessment but also highlights the necessity of comprehensively understanding social, economic, and health implications for developments of this magnitude, particularly when the character and functionality of the community may be at stake. The application, lacking the full dataset, does not provide a comprehensive evidential basis for weighing the potential benefits against the harms.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. It is crucial for developments to support positive health outcomes and to avoid adverse effects; however, the evidence available indicates existing negative impacts that remain undisclosed. Without the complete assessment, compliance with this policy cannot be verified.

The procedural ramifications of this omission are considerable. The competent authority is unable to conduct a thorough socio-economic and health assessment without access to the full Social Impact Assessment. This material omission within the application signifies a failure to meet the evidential standards required by the Environmental Impact Assessment framework.

In summary, the non-disclosure of the full Social Impact Assessment, coupled with evidence of ongoing adverse impacts, renders the assessment incomplete and unreliable. This scenario precludes a lawful determination and strengthens the assertion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts associated with the proposed development is significantly lacking, failing to capture the true extent of the changes anticipated and the sensitivity of the surrounding environment. The character of the West Lewis coastline is defined by its open view of the Atlantic and its undeveloped, remote nature. The proposed large-scale turbines would intrude upon this landscape, establishing an industrial presence that would irrevocably alter its character and result in a permanent transformation.

Furthermore, the evaluation does not accurately depict the magnitude of the visual alterations that would occur. Given the scale and proximity of the turbines, they would dominate the views from residential areas, historic locations, and popular coastal

spots. This dominance would have a detrimental effect on visual amenity and diminish the essential qualities of naturalness and remoteness that define this area. The assessment's failure to adequately address the significance of these impacts in such a sensitive landscape is concerning.

Methodological flaws have also been identified regarding the selection and presentation of visual viewpoints. Evidence indicates that the viewpoints chosen may not fully represent the most sensitive receptors or the most severe scenarios, especially concerning critical cultural heritage sites and valued landscapes. This oversight raises the possibility that the true scale of the visual impact has been underestimated, calling into question the reliability of the assessment's findings.

Additionally, the assessment does not adequately consider the interconnectedness of landscape, seascape, and cultural heritage. Key sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a wider landscape context, linked visually and spatially to the Atlantic horizon. Treating these assets as isolated entities neglects their interdependence, resulting in an incomplete evaluation of the impacts on their cultural significance and setting.

The industrialisation of the seascape would disrupt these connections, altering the context within which heritage sites are appreciated and breaking their link to the natural horizon. This represents not only a visual impact but also a cultural and spatial harm that the application has not sufficiently addressed.

From a policy standpoint, the proposal contradicts the guidelines outlined in the National Planning Framework 4, particularly regarding the protection of natural landscapes and heritage sites. The extent of the proposed changes conflicts with requirements to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further compromises the proposal's compliance with established policy.

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

In summary, the assessment fails to accurately reflect the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a trustworthy evaluation and reinforce the conclusion that the proposal is incompatible with the need to protect this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal involves significant seabed preparation and installation works in a high-energy Atlantic environment. However, the assessment of construction and pollution risks is lacking in detail necessary for evaluating potential environmental effects. There are no fully developed Construction Environmental Management Plans or Pollution

Prevention Plans included in the application. Instead, it relies on mitigation and contingency measures that will be prepared after consent, which does not allow for a meaningful evaluation of their adequacy or effectiveness.

The West Lewis coastline features clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. This makes the reliance on undefined future measures particularly troubling. The application does acknowledge risks, such as sediment mobilisation and accidental chemical or oil spills, but it does not provide enough information on how these will be prevented, controlled, or monitored.

Furthermore, there is uncertainty about the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to determine the extent, duration, or ecological effects of these impacts. This uncertainty also relates to the potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. By delaying contingency planning until after consent, the application hinders the ability to evaluate whether appropriate safeguards are established to manage pollution events. This introduces procedural risks and undermines the competent authority's capacity to assess environmental protection measures at the point of determination.

From a regulatory standpoint, deferring essential environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. It is necessary to assess likely significant effects and mitigation before consent. The lack of such information means that a lawful determination cannot be achieved. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the lack of defined mitigation measures, detailed management plans, and the uncertainty regarding potential impacts result in a materially deficient assessment. These issues prevent a thorough evaluation of construction and pollution risks, further supporting the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents a range of significant deficiencies in its assessment of fisheries and marine life, failing to provide a comprehensive evaluation of 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 proposal does not adequately ensure the protection or maintenance of these crucial habitats and uses, which raises serious concerns regarding potential disruptions.

A major concern lies in the assumption that fishing activities can be displaced without

repercussions. There is a lack of evidence within the application regarding the availability, accessibility, or suitability of alternative fishing grounds to accommodate this displacement. This crucial omission poses risks of overfishing in other areas, which may have broader economic implications for the local fishing fleet. Without a clear, evidence-based assessment, it is impossible to fully grasp the impacts on fisheries and livelihoods.

Moreover, the proposal poses considerable risks to marine species, notably through the underwater noise associated with construction activities. The anticipated high-energy hammer piling over an extended duration is expected to create disturbances that may affect marine life over large distances, particularly species such as dolphins. The potential disruption to a significant portion of the local bottlenose dolphin population raises pressing concerns. Nevertheless, the application appears to minimise the significance of these impacts without providing sufficient supporting evidence.

There exists a contradiction within the application itself, where the necessity of licences to permit harm to European Protected Species is acknowledged, yet impacts are concurrently characterised as negligible. This inconsistency calls into question the credibility of the assessment and raises issues regarding compliance with the Habitats Regulations, especially where anticipated harm is of a nature that requires legal authorisation.

Additionally, the assessment neglects to address cumulative impacts resulting from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. The absence of a thorough evaluation of these cumulative effects obscures the overall impact on marine ecosystems and socio-economic conditions, hindering a proper understanding of the implications involved.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 or the National Marine Plan. It fails to establish that the proposed development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, thereby undermining any assertion that it constitutes sustainable development.

In summary, the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the application collectively render the assessment incomplete and unreliable. These shortcomings significantly obstruct a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal raises significant concerns regarding its treatment of onshore infrastructure, which is assessed separately from the offshore components of what is fundamentally a single integrated project. This fragmented approach obscures the overall environmental and socio-economic impacts that arise from the project, failing to provide a complete understanding of the cumulative effects associated with both

onshore and offshore activities.

Central to the onshore elements are the cabling across protected moorland, the construction of a substation near Stornoway, and the access infrastructure required to support these works. Notably, these activities involve excavation through deep peat areas, particularly in Barvas Moor, an ecologically sensitive habitat and important carbon store. The application lacks a comprehensive assessment of these impacts, which hinders an accurate evaluation of the project's total environmental footprint.

Additionally, the assessment does not adequately consider the significant risks posed to sensitive habitats, including machair systems and peatland environments, which are protected by policy. There is no evidence presented that these impacts have been thoroughly evaluated or that suitable avoidance measures have been established. This omission represents a critical gap regarding biodiversity protection.

Concerns about carbon balance also arise from the disturbance of peatland, which releases stored carbon and could lead to a carbon debt, contradicting the objectives of renewable energy development. The application fails to address these implications or demonstrate that the overall carbon balance remains favourable.

Moreover, the routing of infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. The application does not provide evidence of having initiated the necessary consents or processes, which raises issues regarding the project's deliverability and lawful implementation.

From a policy standpoint, the failure to assess the project comprehensively 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 lack of evidence to show that impacts can be avoided or mitigated further undermines the application's validity.

In summary, the separation of project components, the absence of a thorough assessment, and the lack of evidence regarding environmental and land use impacts render this part of the application incomplete and unreliable, ultimately preventing 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 will fundamentally alter the night-time environment of the West Lewis coastline, which is known for its exceptionally dark skies, a key aspect of the area’s environmental quality, cultural identity, and tourism value.

The Environmental Impact Assessment is notably lacking in its evaluation of the effects this lighting will have on visual amenity, landscape character, and the experiences of both residents and visitors. The significance of dark skies to the region's identity,

particularly in light of emerging tourism sectors such as astro-tourism, makes this omission even more critical. Without addressing the potential impacts of the proposed lighting, there exists a clear gap in the overall assessment of landscape and environmental factors.

Furthermore, there is no analysis of the potential effects on nocturnal wildlife, with key species like the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel being highly sensitive to artificial lighting. These species experience disorientation due to phototaxis, which may increase the risk of collisions. The application fails to include any impact assessment regarding lighting or a study on phototaxis, thereby neglecting to evaluate how the proposed aviation lighting could affect these birds or lead to increased mortality.

The ornithological assessment relies on daytime survey data, which fails to capture nocturnal activity or the associated risks that nocturnal species face. Birds such as Kittiwakes, which may forage or migrate at night, could also be disoriented by artificial lighting, but this risk has not been assessed. The lack of site-specific night-time data leaves a critical gap in understanding the ecological impacts.

The absence of an assessment concerning nocturnal impacts makes it impossible to determine whether protected species or designated sites may be adversely affected. The necessary evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, which engages the precautionary principle and precludes a lawful determination.

From a policy standpoint, this omission stands in conflict with National Planning Framework 4, which pertains to the protection of natural places and environmental quality. It also compromises the broader evaluation of landscape and seascape impacts, as the character of night-time environments is an integral component of the overall environment.

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

TOURISM

The evaluation of tourism impacts is inadequate and does not address the economic and social effects on a crucial sector of the Isle of Lewis economy. The area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness are essential for tourism. Although the application notes that 86% of visitors come for the scenery, it does not provide a quantified assessment of how large-scale offshore infrastructure may influence visitor numbers, behaviour, or overall economic contribution.

Tourism has experienced significant growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and represents up to 16% of the

island’s economy. However, the application fails to model how the industrialisation of the seascape and loss of environmental quality might affect Tourism Gross Value Added or overall economic resilience. Without this analysis, it is impossible to determine if the development would provide a net economic benefit or harm an established and growing sector.

The assessment neglects to consider the significance of environmental quality in supporting tourism, highlighting the importance of unspoiled landscapes and dark skies for visitor experiences and emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment adds to this shortcoming, creating a considerable gap in understanding the impacts on a recognised and expanding part of the local economy.

In an island community with limited economic diversity, the lack of consideration for tourism impacts has broader implications for employment, local businesses, and community sustainability. The absence of a proper Island Communities Impact Assessment means that these economic vulnerabilities have not been evaluated as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, particularly regarding economic impact and the need to show net benefit. It also contradicts strategic goals that identify tourism as a priority growth sector, lacking sufficient evidence for the competent authority to assess the economic implications of the proposal.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the requirements for sustainable development when considered against national policy, statutory duties, and evidential standards. This application mirrors the key issues that led to the rejection of the Lewis Wind Power proposal in 2008. At that time, the level of industrialisation was deemed unacceptable. Now, the application is being assessed under a more rigorous policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant deficiencies in the evidence provided for this application. It lacks a comprehensive and reliable evidential basis for determination. Notable gaps in baseline data exist, and the use of an undefined design envelope is concerning. Furthermore, the reliance on unspecified mitigation measures and the omission of critical impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism, leave the Environmental Impact Assessment incomplete. This inadequacy hampers a full understanding of likely significant effects or residual

impacts.

Procedural failures are evident as well. The absence of a compliant Island Communities Impact Assessment is a breach of statutory duty under the Islands (Scotland) Act 2018. Additionally, the failure to disclose the complete Social Impact Assessment represents a significant omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

This proposal contradicts the objectives set out in National Planning Framework 4. It does not adequately protect biodiversity, natural places, or cultural heritage. Furthermore, it fails to demonstrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, primarily due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been properly assessed, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. The assessments of marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The necessary evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful conclusion that impacts are acceptable.

Additionally, the proposal would cause substantial and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruptions to cultural and visual relationships, and negative impacts on tourism are permanent effects that cannot be mitigated to an acceptable level.

In summary, the application is procedurally and substantively unsuitable for determination. The extensive information deficiencies, combined with conflicts with policy and unresolved environmental risks, impede a lawful and evidence-based decision. The competent authority is urged to refuse consent on these grounds or to invoke the relevant regulatory provisions to request the missing information.

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

Additional Comments

I have family and friends in the area. The impact on me and them,as well as the marine and marine mammals will be devastating. This is a uniquely richly inhabited and thriving area for20 plus species of whales, porpoises,dolphins and other marine mammals. The proposed development will have devastating effects both short and long term for this part of the UK on,marine life,bird life and humans!
This is ecological vandalism!!

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 263E7AAF

Member of the public 1047

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 review under marine licensing and Environmental Impact Assessment regimes. A thorough examination of the Environmental Impact Assessment Report and accompanying documents has highlighted numerous planning, environmental, cultural, and procedural shortcomings. Situated off the west side of the Isle of Lewis, this area is characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

The proposed development presents serious concerns related to its scale, proximity, and design, raising questions about its alignment with statutory requirements, national policy, and sustainable development principles. The application does not present an adequate evidential basis for a lawful determination, as it is marked by missing critical environmental data, limited and inconsistent baseline information, and undefined aspects of the proposal. The reliance on a flexible design framework obscures the understanding of potential significant effects, and the unspecified nature of proposed mitigation measures renders an assessment of their effectiveness impossible. Consequently, the submitted documentation does not facilitate a comprehensive understanding of environmental, cultural, or community impacts, leading to unsupported claims of negligible or non-significant effects.

Furthermore, there are substantial policy conflicts evident in this proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. The application fails to establish that national standards for protecting biodiversity, climate interests, and environmental integrity can be fulfilled. Such conflicts are critical, as they directly impact the statutory tests necessary for consent and compromise the capacity of the competent authority to deem the development acceptable in policy terms.

The unprecedented scale of this proposal, with large turbines located near the shoreline, raises significant issues regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation measures, evidential deficiencies, and clear policy non-compliance underscores that the application is incomplete and incapable of supporting a lawful determination. In light of these concerns, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The proposed project lacks a sufficient assessment of alternatives and does not adhere to the statutory requirements outlined in the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of feasible

alternatives based on their environmental effects, the application only provides a narrative account detailing the evolution of the project. This method does not adequately demonstrate that less harmful options have been identified, assessed, and selected over more damaging alternatives.

Furthermore, there is a lack of transparent, evidence-based comparisons of different offshore locations, development scales, and design configurations. The developer has not convincingly considered the possibility of placing turbines further offshore, where the potential visual, ecological, and coastal impacts could be lessened. Given the sensitivity of the West Lewis coastline and the critical role that proximity to the shore plays in impact assessments, the absence of such analysis undermines any assertion 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 that alternative routes have been adequately explored to minimise impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The lack of a clear strategy for avoidance and the absence of comparative analyses suggest that mitigation by design has not been adequately applied, instead relying heavily on post-design mitigation measures.

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

From a policy standpoint, this inadequacy undermines compliance with National Planning Framework 4, particularly regarding the protection of natural spaces, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment is a significant omission, contributing to the conclusion that the application has not undergone adequate evaluation and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species lacks sufficient depth and fails to provide a comprehensive or reliable insight into the ecological receptors within the West Lewis coastal environment. This region is a biologically active and sensitive marine ecosystem, yet the baseline data presented is insufficient, and the methodologies employed do not adequately capture the presence, behaviour, or habitat use of key species. Consequently, the assessment does not yield a strong evidential basis for evaluating potential impacts.

One significant gap in the assessment concerns otters, a European Protected Species. The application does not adequately acknowledge or evaluate their active utilisation of coastal areas for foraging and movement. The oversight regarding their core foraging

range and behavioural patterns leads to an inadequate assessment of the potential impacts arising from construction disturbance, noise, and heightened activity levels. This omission weakens any conclusions regarding the absence of significant effects on otters.

Additionally, the assessment of basking sharks reveals further shortcomings, as the reliance on aerial surveys introduces notable detection bias, especially in Atlantic conditions. This methodology is likely to underestimate the presence of basking sharks when compared to established land-based observations that indicate frequent use of these waters. The failure to incorporate or sufficiently consider such data results in an incomplete baseline, diminishing the reliability of the conclusions drawn.

These methodological issues mean that assertions of negligible or non-significant effects are primarily based on assumptions rather than robust evidence. The lack of adequate baseline data also hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates ambiguity regarding the actual scale of risk posed to marine species and habitats.

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

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 conclusion that the application lacks a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

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

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

reliability, suggesting that the conclusions drawn are unsupported by the foundational evidence.

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

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

From a regulatory standpoint, the application does not satisfy the evidential requirements necessary to determine that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data inadequacies and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle, thus precluding a lawful conclusion in support of consent.

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The failure to publish the full Social Impact Assessment is a significant oversight that undermines the assessment of social impacts, health, and wellbeing associated with the proposed development. Although the developer engaged local residents through focus groups, the lack of transparency surrounding the complete report creates a substantial evidential gap. This deficiency not only inhibits the public's understanding of the risks identified but also restricts the competent authority's ability to perform a thorough evaluation of the proposal.

Summaries that are available indicate that local residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the

development. These impacts are grounded in direct engagement with the community and are not speculative in nature. However, without access to the full assessment, the findings cannot be adequately scrutinised, thereby limiting the determination of their significance in the decision-making process.

Moreover, evidence suggests that the proposal is viewed as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Yet these critical impacts have not been sufficiently incorporated into the main application or given the necessary weight. The decision to withhold the complete Social Impact Assessment obscures the true human and social cost associated with the development.

The lack of transparency has a detrimental effect on the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is vital for developments of this magnitude, particularly when community character and functioning may be at stake. The omission of the full dataset means that the application lacks a complete evidential basis for assessing the balance between the proposed benefits and potential harm.

From a policy standpoint, the application fails to demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments are required to promote positive health outcomes and mitigate harm, yet the evidence presented suggests existing adverse effects that remain undisclosed. In the absence of the complete assessment, compliance with these policy objectives cannot be affirmed.

The implications of this procedural inadequacy are significant. The competent authority is unable to conduct a robust socio-economic and health evaluation without the full Social Impact Assessment, representing a material omission within the application. This situation constitutes a failure to meet the evidential requirements mandated by the Environmental Impact Assessment framework.

In summary, the combination of non-disclosure of the full Social Impact Assessment alongside the evidence of existing adverse impacts leads to an incomplete and unreliable assessment. This situation ultimately obstructs a lawful determination and confirms that the application is not underpinned by sufficient information.

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline features clean coastal waters and important habitats that are vulnerable to disturbance and contamination. The proposal, which involves significant seabed preparation and installation activities in a high-energy Atlantic environment, lacks comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are intended to be developed after consent is granted. This approach raises concerns, as it prevents a thorough assessment of these measures' adequacy and effectiveness.

The application acknowledges various risks, including sediment mobilisation and

accidental chemical or oil spills, yet it does not offer sufficient detail on how these issues will be prevented, controlled, or monitored. Furthermore, there is uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological ramifications of these impacts, which could affect sensitive marine species and habitats already identified in the broader assessment.

The omission of detailed emergency response procedures further exacerbates these concerns. By postponing contingency planning until after consent, the application hampers the evaluation of whether appropriate safeguards exist to address pollution events. This introduces procedural risk and impairs the competent authority's ability to assess environmental protection measures during the decision-making process.

From a regulatory standpoint, the deferral of essential environmental safeguards is at odds with the requirements set forth by the Environmental Impact Assessment regime. It is necessary to assess likely significant effects and mitigation measures prior to granting consent; without this information, a lawful determination cannot be reached. The application also fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts collectively result in a materially deficient assessment. These issues hinder a robust evaluation of construction and pollution risks, further substantiating the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment presented in the application is inadequate, particularly in its evaluation of fisheries and marine life, failing to provide a thorough examination of ecological and socio-economic impacts. The waters off the West Lewis coast are known for supporting a rich marine ecosystem and a significant fishing industry. However, the application does not adequately demonstrate that these vital uses and habitats can be preserved or sustained without considerable disruption.

A major concern is the assumption that fishing activity can be displaced without repercussions. The application lacks evidence to support claims that alternative fishing grounds are available, accessible, or capable of accommodating increased pressure. This gap is crucial, as such displacement could lead to overfishing in other areas, potentially resulting in broader economic consequences for the local fishing fleet. The absence of a clear, evidence-based assessment means the effects on fisheries and local livelihoods remain inadequately understood.

Moreover, the proposal poses substantial risks to marine species, particularly due to the underwater noise generated during construction. The extensive use of high-energy hammer piling is expected to cause disturbances across considerable distances,

impacting species such as dolphins. The anticipated disturbance to a notable portion of the local bottlenose dolphin population raises serious concerns, yet the application diminishes the importance of these effects, lacking sufficient supporting evidence.

There is also a troubling inconsistency within the application, which acknowledges the requirement for licences to permit harm to European Protected Species while simultaneously asserting that impacts are negligible. This contradiction calls into question the credibility of the assessment and raises issues regarding compliance with the Habitats Regulations, especially where harm is expected to such an extent that it necessitates legal authorisation.

Additionally, the assessment fails to take into account cumulative impacts stemming from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these collective effects, it is impossible to determine the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not adequately show that the proposed development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity, which precludes any conclusion that this proposal represents sustainable development.

Collectively, the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions render the assessment incomplete and untrustworthy. These shortcomings hinder a comprehensive evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment concerning the onshore infrastructure is significantly incomplete and neglects to consider the full range of impacts stemming from what constitutes a single integrated project. The offshore turbines are closely interconnected with the onshore works, yet they are assessed in isolation, leading to a disjointed approach that conceals the true extent of environmental and socio-economic repercussions.

The onshore aspects of the project include cabling that crosses protected moorland, the construction of a substation near Stornoway, and the establishment of access routes through sensitive landscapes. Notably, this work involves excavation across deep peat areas, especially within Barvas Moor, an important carbon store and ecologically sensitive habitat. The application fails to deliver a thorough assessment of these impacts, thereby hindering a comprehensive understanding of the project's overall environmental footprint.

Excluding or postponing the assessment of onshore impacts restricts a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components are considered collectively; however, the

differentiation between offshore and onshore elements leads to a lack of clarity regarding the combined impacts on peatlands, habitats, and local communities.

Additionally, there are considerable risks to delicate habitats, such as machair systems and peatland environments, which are protected by policy. The application does not prove that the impacts on these habitats have been thoroughly evaluated or that suitable avoidance measures have been implemented, creating a significant evidential gap in terms of biodiversity protection.

Concerns also arise regarding carbon balance. The disturbance of peatland results in the release of stored carbon, potentially incurring a carbon debt that contradicts the goals of renewable energy development. The application does not sufficiently address this matter or demonstrate that the overall carbon balance is beneficial.

Furthermore, routing infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application lacks evidence that the necessary consents or processes have been undertaken, casting doubt on the feasibility and lawful execution of the project.

From a policy standpoint, the failure to assess the project in its entirety and to show protection for 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 section of the application incomplete and unreliable, obstructing a lawful determination.

TOURISM

The application presents a significant evidential gap regarding the assessment of tourism impacts, which is crucial for understanding the economic and social consequences for a vital sector of the Isle of Lewis economy. Tourism thrives on the region’s wild coastline, near-pristine landscapes, dark skies, and the prevailing sense of remoteness. While the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or overall economic contributions.

The tourism sector has experienced remarkable growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. Nevertheless, the application neglects to model the potential impacts of industrialising the seascape and the loss of environmental quality on Tourism Gross Value Added and broader economic resilience. In the absence of such analysis, it remains unclear whether the proposed development would yield a net economic benefit or detract from a well-established and expanding sector.

Moreover, the assessment inadequately addresses the significance of environmental quality in attracting tourists, particularly the value of unspoiled landscapes and dark skies to visitor experiences. This oversight extends to the failure to include a Dark Skies Assessment, creating a substantial void in understanding the implications for an acknowledged and developing aspect of the local economy, such as nature-based tourism and astro-tourism.

Given the limited economic diversification in this island community, the neglect in assessing tourism impacts carries broader implications for employment, local businesses, and the sustainability of the community. The lack of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been evaluated as stipulated under the Islands (Scotland) Act 2018.

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

In summary, the inability to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and acknowledge the island's economic dependency culminates in a substantial evidential shortfall. This deficiency obstructs a thorough evaluation of economic effects and reinforces the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the necessary criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. This application mirrors the fundamental issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. Despite being submitted under a more robust policy framework that emphasises the importance of biodiversity, peatland conservation, landscape integrity, and community wellbeing, it lacks a solid evidential foundation.

There are significant gaps in the baseline data presented, an undefined design envelope, unverified mitigation measures, and missing assessments of key impact areas such as nocturnal wildlife, onshore infrastructure, and tourism effects. The Environmental Impact Assessment is thus incomplete, failing to provide a thorough understanding of the likely significant effects or any residual impacts.

Procedural shortcomings are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the failure to submit a complete Social Impact Assessment is a serious omission. These shortcomings inhibit the competent authority from evaluating the

impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Moreover, the proposal contradicts the National Planning Framework 4 by failing to protect biodiversity, natural places, and cultural heritage. It does not demonstrate that health and wellbeing impacts are acceptable, nor does it provide evidence of a net economic benefit due to the lack of tourism impact analysis. The cumulative effects of both offshore and onshore components have not been thoroughly assessed, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks are uncertain and could be significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are either incomplete or inconsistent. The evidential burden required to discount adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and inhibiting a lawful conclusion regarding the acceptability of impacts.

The proposal would lead to substantial and irreversible changes to a sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual connections, and negative impacts on tourism are all permanent effects that cannot be effectively mitigated.

In summary, the application is procedurally and substantively inadequate for determination. The extensive deficiencies in information, along with policy contradictions and unresolved environmental risks, preclude a lawful and evidence-based decision. It is essential for the competent authority to either reject the consent application on these grounds or to invoke the relevant regulatory provisions to require the submission of the necessary information.

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

Additional Comments

I'd be ok with large scale renewable projects but I'd prefer ones that benefit Hebridean lives and ones that take environmental impact into better account, we owe marine life better treatment after centuries of damage to them.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 19AA2173

Member of the public 1048

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. It is founded on a thorough review of the Environmental Impact Assessment Report and accompanying documentation, highlighting substantial deficiencies in planning, environmental considerations, cultural aspects, and procedural integrity. The project is situated off the west coast of the Isle of Lewis, an area known for its Atlantic-facing coastline, relatively untouched environment, and rich cultural heritage. Concerns regarding the scale, proximity, and design of the proposal raise serious questions about its alignment with statutory obligations, national policies, and the core principles of sustainable development.

The application lacks a solid evidential foundation for a lawful decision. There are significant gaps in critical environmental data, with baseline information being limited and inconsistent, leaving many key components of the proposal inadequately defined. The proposed flexible design framework obscures a clear assessment of potentially significant effects, and the anticipated mitigation measures, which remain unspecified, render it impossible to evaluate their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the potential environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust supporting evidence.

Policy conflicts are evident and considerable. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment requirements, or National Planning Framework 4, especially concerning biodiversity, natural areas, cultural heritage, and health and wellbeing. It does not adequately show that the national obligations to preserve biodiversity, safeguard climate interests, and maintain environmental integrity can be fulfilled. These discrepancies directly relate to the statutory tests necessary for consent and hinder the competent authority's ability to determine the development's acceptability from a policy standpoint.

The unprecedented scale of this proposal, with large turbines positioned very close to the shoreline, raises significant concerns regarding landscape capacity, visual dominance, and environmental repercussions. The combination of insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and evident policy non-compliance indicates that the application is incomplete and unable to support a lawful determination. In light of these issues, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application demonstrates significant evidential deficiencies, as it presents gaps in baseline data, limitations in methodology, and an over-reliance on assumptions instead of site-specific evidence. This lack of robust supporting data leads to uncertainty concerning the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are drawn. Consequently, the absence of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that conflicts with statutory requirements.

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

The application also depends heavily on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent on the premise that environmental harm will be addressed at a later stage prevents any meaningful evaluation of effectiveness or the assessment of residual impacts. This postponement of essential information to post-consent stages is procedurally unacceptable and contradicts the purpose of the Environmental Impact Assessment regime, which necessitates that likely significant effects and mitigation measures are established clearly prior to determination.

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

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

ASSESSMENT OF ALTERNATIVES

The proposed development raises significant concerns regarding the adequacy of its assessment of alternatives, which fails to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives that take into account environmental effects, the application merely outlines the evolution of the project. This narrative

approach does not provide assurance that less harmful options have been properly identified, assessed, and preferred over more damaging solutions.

The application lacks a transparent and evidence-based comparison of alternative offshore locations, development scales, and design configurations. Notably, it does not demonstrate that the developer has thoroughly considered the potential benefits of placing turbines further offshore, where the visual, ecological, and coastal impacts could potentially be mitigated. The West Lewis coastline is particularly sensitive, and the significance of proximity to the shore in assessing impact necessitates a thorough analysis, which is currently absent. This omission prevents any determination that the proposed site represents the least damaging option available.

Furthermore, the deficiencies extend to the assessments related to cable routing and landfall. There is inadequate evidence to suggest that alternative routes have been properly explored to minimise impacts on sensitive receptors, including sites of cultural and spiritual importance such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis suggests that the project has not applied mitigation by design, instead relying on post-design mitigation measures. Consequently, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This indicates 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.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed application presents a significant deficiency in the assessment of marine ecology and protected species, failing to provide a complete and reliable understanding of the ecological receptors present within the West Lewis coastal environment. This region is a highly sensitive and biologically active marine system, yet the baseline data is incomplete, and the methodologies employed do not adequately capture the presence, behaviour, and habitat use of species. Consequently, the assessment lacks a sound evidential foundation necessary for evaluating potential impacts.

A notable gap exists in the consideration of otters, which are a European Protected Species. The application does not adequately recognise or assess their active use of coastal areas for foraging and movement. The failure to account for their core foraging range and behavioural patterns leads to an insufficient assessment of the potential effects of construction disturbance, noise, and increased activity, ultimately undermining any conclusions regarding significant effects on this species.

Additionally, the evaluation of basking sharks is deficient due to an overreliance on aerial surveys, which introduces a significant detection bias, particularly under Atlantic conditions. This method is likely to underestimate the presence of these sharks, especially when compared to established land-based observations that indicate their frequent use of these waters. The neglect to incorporate or appropriately consider such data leads to an incomplete baseline, weakening the reliability of the conclusions drawn.

These methodological shortcomings result in conclusions of negligible or non-significant effects being based more on assumptions than on robust evidence. The lack of adequate baseline data further obstructs a meaningful assessment of cumulative and indirect impacts, such as seasonal variation and broader ecosystem interactions. This uncertainty raises concerns about the true scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set out in the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. The level of uncertainty introduced means that adverse effects cannot be reasonably excluded, thus invoking the precautionary principle. Under these circumstances, consent cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These deficiencies inhibit a comprehensive evaluation of impacts on marine ecology and protected species, further affirming that the application does not possess a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

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

A notable contradiction arises within the application, where the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is typically invoked only when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment, suggesting that the conclusions drawn are not substantiated by the supporting evidence. The assessment lacks sufficient information to conclude that seabirds associated with protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. The critical nature of these feeding grounds is not fully recognised, and the

reliance on modelling techniques adds a layer of uncertainty, especially for species experiencing severe declines, such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly given incomplete baseline data and a lack of understanding regarding behavioural responses.

Additionally, the placement of turbines within a recognised migratory corridor introduces a significant risk by creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term consequences of ongoing mortality within this corridor or the potential impacts on species with small global populations.

From a regulatory standpoint, the application does not satisfy the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory findings, combined with data deficiencies and limitations in modelling, means that the standard of beyond reasonable scientific doubt has not been fulfilled. This situation invokes the precautionary principle, thereby obstructing a lawful conclusion in favour of consent. The identified deficiencies also indicate non-compliance with the National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The failure to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct opposition to national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage along the West Lewis coastline is fundamentally flawed, failing to recognise this area as a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. The application adopts an overly simplistic view of heritage, treating it as a collection of isolated, static assets instead of acknowledging their ongoing social, cultural, and spiritual significance within the community.

A major shortcoming of the assessment is the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are not just static features; they serve as active places for burial and spiritual practice. The assessment's failure to consider their continued use and the impact of development on their surroundings leads to a limited understanding of cultural effects and neglects their vital role in community life.

Moreover, intangible cultural heritage, including the Gaelic language and local traditions, as well as the community's enduring relationship with the coastal environment, is not adequately addressed. These aspects are fundamental to the area’s identity but are completely omitted from the assessment, representing a

significant oversight. Without considering these essential factors, the full cultural impact of the proposed development remains obscured.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, which embodies distinct characteristics of an Indigenous People, has not been afforded the process of Free, Prior and Informed Consent. The lack of meaningful engagement undermines the credibility of the assessment and does not adhere to established principles of participation for decisions that impact cultural and environmental interests.

A critical procedural lapse is evident in the failure to conduct a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. This omission hinders the competent authority's ability to meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community, rendering the assessment insufficient for lawful determination.

From a policy standpoint, these shortcomings place the proposal at odds with National Planning Framework 4, particularly regarding the protection of historic assets and sites. The neglect of both tangible and intangible heritage, along with an absence of recognition for living cultural practices, represents a clear deviation from policy requirements.

In summary, the failure to adequately assess living heritage, intangible cultural values, community rights, and statutory obligations culminates in a significant evidential gap. The cultural impacts of the proposed development have not been sufficiently evaluated, leaving the application without a proper foundation for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing associated with the proposed development lacks necessary transparency, leading to a materially deficient evaluation. Although the developer commissioned a Social Impact Assessment that involved focus groups with local residents, the full report remains unpublished. This situation creates a significant evidential gap, which restricts both public insight and the competent authority's ability to fully comprehend the extent of the social risks identified by the developer’s research.

Residents are reportedly experiencing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposed project. These impacts stem from direct engagement and are therefore grounded in reality, not mere speculation. The inability to disclose the complete assessment inhibits proper examination of the findings and limits the capability to evaluate their significance in the decision-making process.

Furthermore, the proposal appears to threaten community identity and cohesion, with “cultural loss” highlighted in the developer’s findings. Despite this recognition, such

impacts have not been adequately integrated into the main application or considered with the seriousness they warrant. By withholding the complete Social Impact Assessment, the developer obscures the genuine human and social costs that the development may impose.

This lack of transparency significantly undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when they may affect community character and functioning. The failure to provide the full dataset means the application does not offer a comprehensive evidential basis necessary to assess the balance between potential benefits and harm.

From a policy perspective, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Developments are required to promote positive health outcomes and mitigate harm; however, the evidence available suggests existing adverse effects that remain undisclosed. Without access to the full assessment, it cannot be shown that compliance with this policy is met.

The procedural ramifications of this situation are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment, which constitutes a material omission in the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

Collectively, the non-disclosure of the full Social Impact Assessment, alongside evidence of current adverse impacts, renders the overall assessment incomplete and unreliable. This scenario obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

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 in close proximity to the shoreline would create a continuous industrial presence that fundamentally alters this character, resulting in a permanent and irreversible transformation of the landscape. The assessment of seascape, landscape, and visual impacts is materially deficient, as it fails to adequately reflect the scale of change or the sensitivity of the receiving environment.

The application does not accurately convey the magnitude of the visual change. The scale and proximity of the turbines mean they would dominate views from residential areas, historic sites, and frequently used coastal locations. This dominance would directly impact visual amenity and erode the defining qualities of naturalness and remoteness. The assessment does not sufficiently communicate the significance of this impact within such a sensitive landscape context.

Methodological concerns arise regarding the selection and presentation of visual

viewpoints. Evidence indicates that the chosen viewpoints may not fully represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the risk that the magnitude of the visual impact has been understated, thereby undermining the reliability of the assessment.

Another significant shortcoming is the failure to assess the interconnected relationship between landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a wider landscape setting, visually and spatially linked to the Atlantic horizon. Treating these as isolated assets instead of recognising their interdependence leads to an incomplete evaluation of the impacts on their setting and cultural significance. The industrialisation of the seascape would sever these relationships, altering the context in which heritage assets are experienced and disrupting their connection to the natural horizon. This presents not only a visual impact but also broader cultural and spatial harm that the application has not sufficiently assessed.

From a policy perspective, the proposal directly conflicts with National Planning Framework 4 regarding the protection of natural places and historic assets. The scale of change is incompatible with the requirement to safeguard landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the absence of a robust worst-case assessment undermines any claims 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 dominant and unavoidable. Consequently, the resulting change is fundamental and permanent, rather than capable of being reduced to an acceptable level through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The application lacks the necessary detail to properly assess construction and pollution risks, rendering the environmental evaluation fundamentally inadequate. It involves extensive seabed preparation and installation within a challenging Atlantic environment, yet fails to present fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on unspecified future mitigation and contingency measures, which hinders any meaningful assessment of their effectiveness or sufficiency.

This dependence on vague future strategies is particularly alarming given the sensitivity of the West Lewis coastline, which is home to clean coastal waters and significant habitats susceptible to sediment disruption and contamination. Although the application recognises risks such as sediment mobilisation and accidental chemical or

oil spills, it does not adequately detail how these will be prevented, monitored, or controlled.

There is significant uncertainty concerning 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 consequences of these impacts. This uncertainty also extends to potential effects on already identified sensitive marine species and habitats.

Moreover, the lack of thorough emergency response procedures exacerbates these issues. By postponing contingency planning until after consent is granted, the application precludes evaluation of whether suitable safeguards are in place for responding to pollution incidents. This introduces procedural risk and diminishes the ability of the competent authority to assess environmental protection measures adequately at the determination stage.

From a regulatory standpoint, the postponement of essential environmental safeguards is at odds with the Environmental Impact Assessment requirements. The assessment of likely significant effects and mitigation should occur prior to granting consent; without this critical information, a lawful determination cannot be achieved. Additionally, the application does not 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 regarding potential impacts collectively render the assessment materially deficient. These flaws hinder a comprehensive evaluation of construction and pollution risks, further reinforcing the position 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 lacks a thorough assessment of how these vital uses and habitats can be preserved without significant disruption. One major concern is the assumption that fishing activities can be relocated without negative effects. The application does not provide evidence that alternative fishing grounds exist or can handle the additional pressure, which poses a serious risk of overfishing in other areas and could have wider economic repercussions for local fishermen.

Additionally, the proposal presents considerable risks to marine species, notably due to underwater noise from construction activities. The prolonged use of high-energy hammer piling could disturb marine life over large distances, particularly affecting dolphins. The application suggests that the disturbance to a significant portion of the local bottlenose dolphin population is not substantial, yet this claim is made without adequate supporting evidence, raising serious concerns about its validity.

Furthermore, the application acknowledges the necessity for licences to allow harm to European Protected Species, while simultaneously downplaying the potential impacts as negligible. This contradiction raises doubts about the assessment's reliability and compliance with the Habitats Regulations, especially where harm is expected to require legal authorisation. The assessment also neglects to address cumulative impacts from various pressures such as habitat disturbance, noise, and fishing displacement. Without a thorough evaluation of these combined effects, it is impossible to accurately gauge 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 impacts on marine biodiversity, making it difficult to conclude that the proposal aligns with sustainable development principles. Collectively, the lack of evidence regarding fishing displacement, the underestimation of noise impacts, and the internal inconsistencies render the assessment insufficient and untrustworthy. These issues hinder any reliable evaluation of the potential effects 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 absence of an assessment regarding dark skies and nocturnal wildlife represents a significant oversight in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism potential. The proposed development would introduce permanent red aviation lighting that is visible over considerable distances, resulting in a continuous and intrusive "wall of light" effect on the western horizon, which would fundamentally change the night-time environment.

Moreover, the application fails to evaluate how this lighting would impact visual amenity, landscape character, and the experiences of both residents and visitors. This lack of analysis is particularly troubling given the crucial role dark skies play in the region's identity and the growing sectors of tourism like astro-tourism. Consequently, the omission of these impacts creates a clear gap in the overall landscape and environmental assessment.

Of even greater concern is the absence of any evaluation of the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are highly 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, thereby neglecting to assess the potential effects of aviation lighting on these species and their mortality rates.

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

Without a proper assessment of nocturnal effects, it is impossible to ascertain whether protected species or designated sites would suffer adverse consequences. The evidential standard needed to rule out negative effects beyond reasonable scientific

doubt cannot be achieved, invoking the precautionary principle and obstructing a lawful determination.

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

In summary, the lack of any assessment concerning dark skies and nocturnal wildlife signifies a considerable 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 assessment of tourism impacts within the application is notably inadequate and neglects to address the economic and social implications for a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and a profound sense of remoteness. The application itself acknowledges that 86% of visitors are attracted by the scenery, yet it lacks a quantified analysis of how the introduction of large-scale offshore infrastructure would influence visitor numbers, behaviour, or the overall economic contribution to the region.

The significance of tourism in the local economy is underscored by its substantial growth, with revenues increasing from £65 million in 2017 to over £81.5 million and supporting more than 1,000 jobs, accounting for as much as 16% of the island's economy. Despite this impressive development, the application fails to simulate how the industrialisation of the seascape and the degradation of environmental quality could adversely affect Tourism Gross Value Added and the broader economic resilience. Without this crucial analysis, it remains unclear whether the proposed development would yield a net economic benefit or harm an already established and expanding sector.

Moreover, the assessment neglects the essential role that environmental quality plays in bolstering tourism, including the critical importance of unspoiled landscapes and dark skies in enriching visitor experiences and tapping into emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, leaving a significant gap in understanding the impacts on a recognized and growing segment of the local economy.

In an island community characterised by limited economic diversification, the disregard for tourism impacts carries broader repercussions for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been thoroughly evaluated as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application fails to illustrate compliance with the

National Planning Framework 4, particularly concerning economic impact and the necessity to demonstrate net benefits. It also contradicts strategic objectives that prioritise tourism as a key growth sector and lacks sufficient evidence for the competent authority to properly assess the economic ramifications of the proposal.

Overall, the failure to quantify tourism impacts, evaluate the environmental factors driving visitor behaviour, and account for the island's economic dependency culminates in a significant evidential gap. This deficiency inhibits a comprehensive appraisal of the economic effects, leading to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm signifies a significant failure to meet the standards of sustainable development as required by statutory duties, national policy, and evidential criteria. This application echoes the principal issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Presenting this application under a stronger policy framework, which emphasises the importance of biodiversity, peatland conservation, landscape integrity, and community welfare, does not mitigate these concerns.

The evidential basis for the application remains incomplete and unreliable. There are crucial gaps in the baseline data, the design envelope remains undefined, and reliance on unspecified mitigation measures raises significant concerns. Key impact pathways have been omitted from the assessment, including effects on nocturnal wildlife, comprehensive onshore infrastructure, and potential tourism impacts. Consequently, the Environmental Impact Assessment lacks completeness, hindering a thorough understanding of likely significant effects and residual impacts.

Moreover, procedural deficiencies are evident. The lack of a compliant Island Communities Impact Assessment is a breach of statutory obligation under the Islands (Scotland) Act 2018. Additionally, the failure to provide a complete Social Impact Assessment represents a significant omission, limiting the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic stability, thus rendering the application unsuitable for determination.

The proposal is also at odds with National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural environments, and cultural heritage, fails to establish 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 both offshore and onshore elements have not been properly evaluated, obscuring the implications for peatlands, carbon balance, habitats, and crofting land.

There remains uncertainty around environmental risks, which may be significant. The assessments concerning marine ecology, seabirds, protected species, and marine

mammals are incomplete and contain inconsistencies. The evidential threshold required to discount adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

Additionally, the proposal would lead to substantial and irreversible alterations to a particularly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruptions to cultural and visual relationships, and detrimental impacts on tourism are permanent effects that cannot be sufficiently mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The considerable information deficiencies, alongside policy conflicts and unresolved environmental risks, obstruct a lawful, evidence-based decision. It is imperative that the competent authority refuse consent on these grounds or utilise the appropriate regulatory provisions to mandate the submission of the outstanding information.

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

Additional Comments

There are numerous historic cemeteries along this coastline, including Dalmore Cemetery, Bragar Cemetery, Borve Cemetery, Galson Cemetery, Ness Cemetery, Dell Cemetery, Port of Ness Cemetery, Swainbost Cemetery, Lionel Cemetery, Shader Cemetery, Barvas Cemetery, Brue Cemetery and Bragar Old Cemetery. These burial grounds hold deep cultural, spiritual, and familial significance for the communities of Lewis.

Many families, including my own, have loved ones buried at these sites. My father rests at Dalmore Cemetery, which overlooks the very seascape that would be dominated by the proposed turbines. The tranquillity, dignity, and solemn character of these places of remembrance would be fundamentally altered by the industrialisation of the horizon.

Scottish heritage policy requires that developments must protect the setting of historic and culturally significant sites, including burial grounds. The applicant has not assessed the visual, cultural, or emotional impact on these cemeteries, nor provided any mitigation. This omission is serious and represents a failure to recognise the cultural identity and lived heritage of the island communities.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: EF255E3F

Member of the public 1049

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 marine licensing and Environmental Impact Assessment regimes. The application is situated off the west side of the Isle of Lewis, known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Significant concerns arise from the scale, proximity, and design of the proposal regarding its compatibility with statutory requirements, national policy, and principles of sustainable development.

An adequate evidential basis for lawful determination is lacking in the application. Critical environmental data is absent, baseline information is limited and inconsistent, and key aspects of the proposal remain undefined. The reliance on a flexible design framework prevents a clear understanding of likely significant effects. Furthermore, the dependence on unspecified mitigation measures means their effectiveness cannot be assessed. Consequently, the documentation does not provide a comprehensive understanding of environmental, cultural, or community impacts, with claims of negligible or non-significant effects lacking robust evidence.

There are also evident policy conflicts. 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 fails to demonstrate compliance with national requirements intended to protect biodiversity, climate interests, and environmental integrity. These conflicts are pertinent to the statutory tests necessary for consent and undermine the capacity of the competent authority to determine the development as acceptable in policy terms.

The scale of the proposal is unprecedented for this area, with large turbines positioned close to the shoreline, raising significant concerns about landscape capacity, visual dominance, and environmental impact. Collectively, the insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. Under these conditions, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies, failing to deliver a complete, transparent, and dependable analysis of the potential environmental effects of the proposed development. A major concern is the use of a flexible Project Design Envelope, which lacks commitment to precise turbine sizes, layouts, or configurations. This introduces considerable uncertainty, hindering the

application of a worst-case scenario approach. Consequently, the integrity of the assessment is compromised, preventing both the public and the competent authority from gaining an accurate understanding of the actual environmental impacts that may arise from the development.

Moreover, the application is heavily reliant on yet-to-be-defined mitigation measures, monitoring strategies, and management plans. This approach seeks consent on the premise that environmental harm will be addressed at a future stage, thereby obstructing any meaningful evaluation of the effectiveness of such measures or the assessment of residual impacts. Deferring critical information to stages beyond consent is procedurally unacceptable, contravening the fundamental aim of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation strategies be clearly delineated prior to decision-making.

There are also substantial gaps in evidence, including shortcomings in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. Such gaps create uncertainty about the scale and significance of impacts, particularly in instances where negligible or non-significant effects are asserted without robust supporting data. The lack of adequate information obstructs a clear comprehension of cumulative and worst-case impacts, fostering a level of scientific uncertainty that contradicts statutory obligations.

Consequently, the application does not satisfy the evidential standards set forth under the Habitats Regulations, which aim to exclude adverse effects beyond reasonable scientific doubt. This necessitates the application of the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate compliance with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it has not been established that impacts have been fully evaluated or that appropriate safeguards are in place.

In summary, the combination of reliance on an unspecified design envelope, the absence of defined mitigation, and deficiencies in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. Such shortcomings inhibit a lawful and rigorous evaluation of environmental effects, leaving the competent authority unable to make a fully informed decision based on the information available.

ASSESSMENT OF ALTERNATIVES

The application lacks a proper assessment of alternatives, which is crucial for compliance with the Environmental Impact Assessment regime. Instead of delivering a clear and reasoned comparison of feasible alternatives based on their environmental effects, it presents a narrative of the project's evolution. This method neglects to show that less harmful options have been thoroughly identified, evaluated, and chosen over more damaging solutions.

Furthermore, there is a distinct absence of transparent, evidence-based comparisons of alternative offshore locations, development scales, or design configurations. Notably, the application does not indicate that the developer has genuinely considered positioning turbines further offshore, which could potentially lessen visual, ecological, and coastal impacts. Given the delicate nature of the West Lewis coastline and the critical role that proximity to shore plays in assessing impact, the lack of such analysis hinders any conclusion that the proposed siting is indeed the least harmful option.

Additionally, the issues extend to the evaluation of cable routing and landfall assessments. There is a lack of sufficient evidence showing that alternative routes have been adequately investigated to avoid or mitigate impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The failure to provide a clear avoidance strategy, combined with the absence of comparative analysis, signifies that mitigation through design has not been employed, relying instead on measures that would be implemented after design.

Consequently, the application does not demonstrate that environmental harm has been minimized through appropriate site selection, layout, and infrastructure routing. This represents a disregard for the established mitigation hierarchy and obstructs the competent authority from determining whether less harmful and more suitable alternatives exist. In the absence of a rigorous assessment of alternatives, it is impossible to assert that the proposal aligns with sustainable or policy-compliant solutions.

From a policy standpoint, this shortcoming undermines adherence to National Planning Framework 4, especially in terms of safeguarding natural areas, cultural heritage, and community wellbeing. The lack of a systematic and comparative assessment is a significant omission that contributes to the overall conclusion that the application has not been adequately evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species is incomplete and does not give a reliable understanding of ecological receptors in the West Lewis coastal area. This region is a sensitive and biologically rich marine environment, yet the baseline data is lacking, and the methods used do not adequately capture the presence, behaviour, and habitat use of various species. Consequently, the assessment fails to provide a solid evidential foundation for determining impacts.

A significant shortcoming involves otters, which are a European Protected Species. The application does not adequately recognise or assess their use of coastal areas for foraging and movement. The oversight regarding their core foraging range and behavioural patterns means that potential effects from construction disturbances, noise, and increased activity have not been thoroughly evaluated. This weakens any assertions made regarding the lack of significant effects on this species.

Further issues arise in the assessment of basking sharks. The reliance on aerial surveys

creates a notable detection bias, especially under Atlantic conditions, likely leading to an underestimation of their presence. In contrast, established land-based observations indicate that these waters are frequently used by basking sharks. The failure to properly consider such data results in an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological flaws mean that claims of negligible or non-significant effects are based more on assumptions than on strong evidence. The lack of sufficient baseline data also hampers the meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises questions about the real risks to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements set out in the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been adequately identified or assessed. This uncertainty means that adverse effects cannot be excluded beyond reasonable scientific doubt, activating 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 shortcomings hinder a thorough evaluation of the impacts on marine ecology and protected species, reinforcing the conclusion that the application lacks a solid evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The application under consideration presents significant deficiencies in its ornithological assessment, which is flawed due to substantial gaps in evidence and internal contradictions that challenge its conclusions. Situated on the west coast of the Isle of Lewis, an area that supports seabird populations of international importance, the proposal fails to adequately demonstrate that these species, many of which are already in decline, will not experience adverse impacts. The proposed development is located within crucial foraging areas and migratory corridors, yet the assessment does not thoroughly evaluate the risks of displacement, collision, or habitat loss for these birds.

A notable contradiction within the application arises when the developer asserts that there will be no significant adverse effects while also putting forward a Habitats Regulations derogation case, which is intended for situations where significant harm is anticipated. This inconsistency casts doubt on the validity of the assessment and suggests that its conclusions lack support from the evidence provided. The assessment does not convincingly show that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unharmed. The critical nature of these feeding grounds is inadequately considered, and reliance on modelling methods adds uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars. Moreover, the methodologies employed are likely to underestimate mortality rates, particularly given the incomplete baseline data and the limited understanding of behavioural responses.

The placement of turbines within a known migratory corridor introduces significant risks by potentially obstructing a primary flight path for species migrating between the United Kingdom and Iceland. The application lacks a comprehensive assessment of the long-term consequences of sustained mortality in this corridor and the implications for species with small global populations.

From a regulatory standpoint, the application does not meet the evidential standards required to confirm no adverse effects on the integrity of protected sites. The contradictory findings, coupled with data gaps and limitations in modelling, mean that the necessary standard of proof beyond reasonable scientific doubt has not been achieved. This situation invokes the precautionary principle, making a lawful conclusion in favour of consent unattainable.

Furthermore, the identified deficiencies represent a failure to adhere to National Planning Framework 4, which relates to the protection of biodiversity and natural assets. The inability to prove that internationally important seabird populations will remain unaffected places the proposal in direct conflict with national policy. Collectively, these factors render the assessment unreliable, undermined by methodological weaknesses and insufficient evidence. These shortcomings hinder a comprehensive evaluation of potential impacts and lead to the conclusion that the application does not satisfy the statutory requirements necessary for a determination.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The non-disclosure of the full Social Impact Assessment creates a significant evidential gap, which hampers the ability of both the public and the competent authority to grasp the complete range of social risks identified by the developer's own research. While a Social Impact Assessment was commissioned and included focus groups with local residents, the absence of the full report restricts proper scrutiny of its findings. Summaries suggest that residents are already experiencing notable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are not speculative; they stem from direct engagement with the community.

Moreover, the proposal is viewed as a direct threat to community identity and cohesion, with “cultural loss” highlighted in the developer’s findings. Despite this, such impacts have not been adequately integrated into the main application or given appropriate consideration. The lack of transparency in withholding the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

This deficiency undermines the Environmental Impact Assessment process, which necessitates a comprehensive understanding of social, economic, and health impacts, especially for projects of this magnitude that may influence community character and functioning. Without the complete dataset, the application fails to provide a thorough evidential basis to assess the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate compliance with the National Planning Framework 4 regarding health and wellbeing. Developments must promote positive health outcomes and avoid harm; however, the evidence available indicates existing adverse effects that remain undisclosed. Consequently, without the full assessment, adherence to this policy cannot be established.

The implications for the procedural aspects are notable. The competent authority cannot effectively carry out a robust socio-economic and health evaluation without access to the complete Social Impact Assessment. This situation reflects a material omission within the application, failing to satisfy the evidential requirements of the Environmental Impact Assessment regime.

In summary, the combination of non-disclosure of the full Social Impact Assessment and the evidence of existing negative impacts leads to an incomplete and unreliable assessment. This situation obstructs a lawful determination and further supports the conclusion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal for large-scale turbines in close proximity to the West Lewis coastline threatens to fundamentally alter the area's character, which is defined by its open Atlantic horizon and a strong sense of remoteness. This industrial presence would result in a permanent and irreversible transformation of the landscape. The assessment of seascape, landscape, and visual impacts is materially deficient, as it does not adequately reflect the scale of change or the sensitivity of the receiving environment.

Visual impacts are understated, as the application fails to fully capture the magnitude of the visual change. The size and location of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and eroding the qualities that define naturalness and remoteness. Moreover, the assessment does not effectively convey the significance of these impacts within the context of such a sensitive landscape.

Methodological concerns arise from the selection and presentation of visual viewpoints, which may not adequately reflect the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This oversight risks underestimating the visual impact, thereby undermining the reliability of the assessment.

The interconnected relationship between landscape, seascape, and cultural heritage has not been sufficiently assessed. Significant sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a wider landscape setting that relies on visual and spatial relationships with the Atlantic horizon. By treating these sites as isolated assets, the assessment fails to acknowledge their interdependence, resulting in an incomplete evaluation of impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are experienced and disconnecting them from the natural horizon. This not only represents a visual impact but also leads to broader cultural and spatial harm that the application has not properly assessed.

From a policy standpoint, the proposal conflicts with National Planning Framework 4, particularly regarding the protection of natural places and historic assets. The anticipated scale of change is inconsistent with the need to safeguard landscape character, visual amenity, and the settings of culturally significant sites. Furthermore, the absence of a robust worst-case assessment diminishes any claim of compliance with policy.

The impacts identified cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. As a result, the change is fundamental and permanent, not something that can be reduced to an acceptable level through mitigation efforts.

Overall, the assessment inadequately represents the extent of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These deficiencies hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal fundamentally alters the night-time environment along the West Lewis coastline, introducing permanent red aviation lighting that creates a continuous and intrusive “wall of light” effect across the western horizon. This significant change not only impacts visual amenity but also poses a severe risk to the area’s cultural identity and tourism value, particularly in light of the emerging astro-tourism sector, which thrives on the exceptionally dark skies that characterise this region. The application fails to assess how this new lighting affects landscape character or the experience of both residents and visitors, leaving a critical gap in the environmental assessment.

Moreover, the absence of an evaluation concerning the impacts on nocturnal wildlife is alarming. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are known to be particularly sensitive to artificial lighting due to phototaxis. The proposal neglects to include any form of lighting impact assessment or phototaxis study, thus failing to evaluate how the aviation lighting might increase the risk of disorientation and collision for these species. This omission is further exacerbated by a reliance on daytime survey data in the ornithological assessment, which does not adequately capture nocturnal activity or associated risks. For instance, Kittiwakes, which may forage or migrate at night, are also vulnerable to disorientation from such lighting, yet this risk has not been addressed.

The lack of site-specific night-time data creates an essential void in understanding the ecological impacts, preventing a determination of whether protected species or

designated sites could be adversely affected. The evidential standard needed to exclude adverse effects beyond reasonable scientific doubt remains unmet, thus invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this glaring omission contradicts the National Planning Framework 4, which underscores the importance of protecting natural places and ensuring environmental quality. It also undermines the comprehensive evaluation of landscape and seascape impacts, as the character of night-time environments is an integral component of the overall ecosystem.

In sum, the failure to assess dark skies and nocturnal wildlife results in a significant evidential gap. The absence of baseline data, impact modelling, and species-specific analysis means that the application is incomplete and cannot support a lawful determination.

TOURISM

The application under consideration lacks a thorough assessment of the impacts on tourism, which is a vital sector for the Isle of Lewis economy. It is crucial to note that tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and overall sense of remoteness. Although the application states that 86% of visitors are attracted by scenery, it fails to provide a quantified analysis of how large-scale offshore infrastructure may influence visitor numbers, their behaviour, or the overall economic contribution of tourism.

Since 2017, tourism on the island has seen substantial growth, rising from £65 million to over £81.5 million, and it supports more than 1,000 jobs while accounting for as much as 16% of the island's economy. Nonetheless, the application does not model the potential effects of seascape industrialisation and the degradation of environmental quality on Tourism Gross Value Added or the broader economic resilience of the area. This lack of analysis makes it impossible to ascertain whether the proposed development would yield a net economic benefit or detract from a sector that is both established and expanding.

Furthermore, the assessment neglects to account for the critical role that environmental quality plays in sustaining tourism, particularly the significance of unspoiled landscapes and dark skies to the visitor experience. Emerging markets such as nature-based tourism and astro-tourism highlight the need for a comprehensive understanding of these factors. The absence of a Dark Skies Assessment exacerbates the shortcomings of the application, creating a considerable gap in understanding the potential impacts on this recognised and growing aspect of the local economy.

In an island community that has limited economic diversification, the lack of an assessment of tourism impacts raises broader concerns for employment, local enterprises, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been evaluated as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, particularly regarding economic impacts and the necessity to show net benefit. It also contradicts strategic objectives that designate tourism as a priority growth sector, while lacking sufficient evidence for the competent authority to effectively assess the economic ramifications of the proposal.

The combination of insufficient quantification of tourism impacts, inadequate consideration of the environmental factors driving visitor behaviour, and a disregard for the island's economic dependency results in a significant evidential gap. This omission undermines the ability to conduct a robust evaluation of the economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the necessary standards of sustainable development, which are outlined in statutory duties, national policy, and evidential criteria. It echoes the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application falls short in numerous critical areas.

There are significant deficiencies in the evidential foundation required for decision-making. The application lacks comprehensive baseline data and relies on an undefined design envelope, with unspecified mitigation measures. Key impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism, have been omitted. Consequently, the Environmental Impact Assessment is incomplete, preventing a thorough understanding of the likely significant effects or residual impacts.

Moreover, procedural failings are evident in the submission. The absence of a compliant Island Communities Impact Assessment breaches the statutory requirements of the Islands (Scotland) Act 2018. Additionally, the non-disclosure of the full Social Impact Assessment constitutes a material omission, which hinders 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 with National Planning Framework 4, as it does not adequately demonstrate the protection of biodiversity, natural spaces, 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 impact of both offshore and onshore components has not been properly assessed, obscuring their effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks presented in the application remain uncertain and potentially

significant. Evaluations of marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The required evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful determination that the impacts are acceptable.

Furthermore, the proposal would induce substantial and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline would lead to the loss of dark skies, disruption of cultural and visual relationships, and adverse effects on tourism, resulting in permanent impacts that cannot be mitigated satisfactorily.

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

Additional Comments

As a regular visitor to the Western Isles, this project will alter the vista and damage the reason why so many visit the Isles each year.

This beautiful area doesn't need a vast offshore windfarm as the need for the energy is elsewhere.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: A4EA2F3B

Member of the public 1050

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 review under marine licensing and Environmental Impact Assessment regimes. A thorough examination of the Environmental Impact Assessment Report and accompanying documents has highlighted numerous planning, environmental, cultural, and procedural shortcomings. Situated off the west side of the Isle of Lewis, this area is characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

The proposed development presents serious concerns related to its scale, proximity, and design, raising questions about its alignment with statutory requirements, national policy, and sustainable development principles. The application does not present an adequate evidential basis for a lawful determination, as it is marked by missing critical environmental data, limited and inconsistent baseline information, and undefined aspects of the proposal. The reliance on a flexible design framework obscures the understanding of potential significant effects, and the unspecified nature of proposed mitigation measures renders an assessment of their effectiveness impossible. Consequently, the submitted documentation does not facilitate a comprehensive understanding of environmental, cultural, or community impacts, leading to unsupported claims of negligible or non-significant effects.

Furthermore, there are substantial policy conflicts evident in this proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. The application fails to establish that national standards for protecting biodiversity, climate interests, and environmental integrity can be fulfilled. Such conflicts are critical, as they directly impact the statutory tests necessary for consent and compromise the capacity of the competent authority to deem the development acceptable in policy terms.

The unprecedented scale of this proposal, with large turbines located near the shoreline, raises significant issues regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation measures, evidential deficiencies, and clear policy non-compliance underscores that the application is incomplete and incapable of supporting a lawful determination. In light of these concerns, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate, failing to provide a complete and transparent evaluation of the potential environmental effects of the proposal. The reliance on a flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations for the turbines, introduces considerable uncertainty. This lack of specificity undermines the assessment's integrity, meaning that the impacts presented may not accurately reflect the actual development, thereby preventing both the public and the competent authority from fully grasping the true environmental implications.

Additionally, the application is dependent on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent based on the premise that environmental damage will be resolved later limits any meaningful assessment of effectiveness or residual impacts. This postponement of essential information until after consent is granted is not procedurally acceptable and contradicts the fundamental purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly delineated prior to any determination.

There are also major evidential gaps in the assessment, which include shortcomings in baseline data and methodology, as well as an over-reliance on assumptions rather than site-specific evidence. This generates uncertainty about the scale and significance of the impacts, particularly where claims of negligible or non-significant effects are made without robust supporting data. The lack of sufficient information hinders a comprehensive understanding of cumulative and worst-case impacts, creating scientific uncertainty that cannot be reconciled with statutory obligations.

Consequently, the application does not satisfy the evidential standards stipulated under the Habitats Regulations, which require the exclusion of adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate adherence to the National Planning Framework 4, which includes mandates for biodiversity protection and environmental integrity, as it has not been established that impacts have been thoroughly evaluated or that suitable safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specified mitigation, and gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These issues obstruct a lawful and rigorous assessment of environmental effects, leaving the competent authority unable to make a decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application proposes a development that is severely lacking in a thorough assessment of alternatives, which is crucial under the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of viable alternatives with respect to their environmental consequences, it presents a narrative

regarding the evolution of the project. This method does not adequately show that options which could potentially cause less harm have been appropriately identified, evaluated, and chosen over more damaging alternatives.

There is a concerning absence of transparent, evidence-based comparisons for different offshore locations, development scales, or design configurations. Notably, the application does not provide evidence that the developer has genuinely considered placing turbines further from the shore, where the impacts—ecological, visual, and coastal—would likely be lessened. Given the sensitivity of the West Lewis coastline and the critical role that distance from shore plays in determining the impact, the failure to conduct such an analysis undermines any assertion that the proposed location is the least damaging.

These shortcomings extend to the assessment of cable routing and landfall. There is inadequate evidence that alternative routes have been sufficiently explored to mitigate or avoid effects on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The lack of a clear strategy for avoidance and comparative analysis suggests a reliance on post-design mitigation measures rather than the application of mitigation through design.

Consequently, the application does not demonstrate that environmental harm has been minimised in terms of site selection, layout, and infrastructure routing. This failure to adhere to the established mitigation hierarchy restricts the competent authority's ability to ascertain whether there are less harmful and more suitable alternatives available. Without a thorough assessment of alternatives, it cannot be concluded that the proposal is a sustainable or compliant solution within the relevant policy framework.

From a policy standpoint, this inadequacy detracts from compliance with National Planning Framework 4, especially concerning the protection of natural environments, cultural heritage, and community wellbeing. The lack of a systematic and comparative assessment is a significant omission that further supports the conclusion that the application has not been adequately evaluated and cannot facilitate a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

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

The assessment notably overlooks otters, classified as a European Protected Species. The application does not adequately recognise or evaluate their active use of coastal areas for foraging and movement, failing to consider their core foraging range and

behavioural patterns. This gap in understanding means that the potential effects of construction disturbance, noise, and increased activity on otters have not been properly assessed, undermining any conclusions regarding the absence of significant effects on this species.

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

These methodological shortcomings render conclusions of negligible or non-significant effects based more on assumptions than on robust evidence. Furthermore, the absence of sufficient baseline data hampers a meaningful assessment of cumulative and indirect impacts, including seasonal variation and interactions within the broader ecosystem. This creates uncertainty about the true scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. The level of uncertainty introduced precludes the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these circumstances, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development reveals significant flaws, undermining its credibility. There are substantial gaps in the evidence and internal inconsistencies that raise serious questions about its conclusions. The west coast of the Isle of Lewis is home to internationally significant seabird populations, many of which are already declining. However, the application does not provide the necessary evidence to demonstrate that these species will not be adversely affected. The development site is situated within crucial foraging areas and migratory pathways, yet the assessment fails to thoroughly evaluate the risks of displacement, collision, or habitat loss.

A major contradiction arises within the application itself. The developer asserts that there will be no significant adverse effects, while also putting forth a Habitats Regulations derogation case, which is only relevant when significant harm is anticipated. This contradiction casts doubt on the reliability of the assessment and suggests that the conclusions drawn are not backed by adequate evidence.

Furthermore, the assessment lacks sufficient proof that seabird species linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is not adequately recognised, and the reliance on modelling methods introduces further uncertainty, particularly for severely declining species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, especially when baseline data is incomplete and behavioural responses are not fully considered.

The proposed siting of turbines within a recognised migratory corridor presents an additional and serious 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 consequences of ongoing mortality within this corridor or the potential impacts on species with relatively small global populations.

Regulatory concerns emerge as the application fails to meet the evidential threshold necessary to assert no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and modelling shortcomings, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle and precludes a lawful conclusion in favour of consent.

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

In summary, the assessment's internal inconsistencies, methodological weaknesses, and lack of sufficient evidence render it unreliable. These issues hinder a thorough evaluation of potential impacts and lead to the conclusion that the application does not satisfy the statutory requirements necessary for a valid determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment regarding cultural heritage and community identity is severely lacking, failing to recognise the West Lewis coastline as a vibrant cultural landscape in which environment, language, tradition, and community are deeply interwoven. The application adopts a simplistic view, treating heritage as isolated, static assets rather than acknowledging their dynamic social, cultural, and spiritual roles within the community.

A significant shortcoming is found in the handling of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are not merely static features; they are active locations for burial and spiritual practices. However, the assessment incorrectly categorises them, overlooking their ongoing significance, usage, and the implications of development on their surroundings. This flawed interpretation leads to an inadequate evaluation of cultural effects and dismisses their

importance in community life.

Moreover, the application neglects the assessment of intangible cultural heritage, which includes 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 but are entirely omitted from the assessment, marking a substantial oversight. Without acknowledging these elements, the cultural impact of the development remains poorly understood.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, which embodies a unique cultural identity with characteristics of an Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement compromises the legitimacy of the assessment and fails to adhere to established principles of participation in matters that affect cultural and environmental interests.

There is a critical procedural failing in the absence of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. The omission of this assessment means that the competent authority cannot meet its legal obligations to evaluate the social, cultural, and economic ramifications for the island community. This alone undermines lawful determination.

From a policy perspective, these shortcomings place the proposal in direct opposition to the National Planning Framework 4, especially regarding the protection of historic assets and places. The disregard for both tangible and intangible heritage, coupled with the failure to acknowledge living cultural practices, constitutes a clear deviation from policy requirements.

When considered collectively, the neglect of living heritage, intangible cultural values, community rights, and statutory obligations results in a substantial evidential gap. The application does not adequately assess the cultural impacts of the development, nor does it provide a solid foundation for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency regarding the Social Impact Assessment raises significant concerns about the lawful evaluation of social impacts, health, and wellbeing associated with the proposed development. Although the developer engaged local residents through focus groups, the full report of this assessment remains unpublished, creating a substantial evidential gap. This absence impedes both public understanding and the competent authority’s ability to grasp the full scope of social risks revealed by the developer's own research.

Summaries suggest that local residents are experiencing notable levels of stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts, derived from direct engagement with the community, are factual rather than

speculative. However, the non-disclosure of the complete assessment restricts proper examination of the findings and hampers the determination of their relevance within the decision-making process.

Moreover, there is recognition that the proposal poses a perceived threat to community identity and cohesion, with findings indicating potential "cultural loss." Despite this identification, such impacts have not been fully incorporated into the main application nor given the appropriate consideration they warrant. The failure to provide the entire Social Impact Assessment effectively obscures the genuine human and social costs associated with the development.

This deficiency in transparency significantly undermines the Environmental Impact Assessment process. An exhaustive understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly when community character and functionality may be adversely influenced. The lack of a complete dataset in the application fails to provide a comprehensive evidential basis for evaluating the balance between potential benefits and harms.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Development projects are required to foster positive health outcomes while mitigating adverse effects; however, the existing evidence suggests negative impacts that remain inadequately disclosed. Without access to the full assessment, compliance with these policy requirements cannot be substantiated.

The procedural ramifications are considerable, as the competent authority is unable to conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This omission constitutes a material shortfall within the application and reflects a failure to satisfy the evidential standards of the Environmental Impact Assessment framework.

In summary, the withholding of the full Social Impact Assessment, in conjunction with the documented evidence of existing negative impacts, results in an incomplete and unreliable evaluation. This situation precludes a lawful determination and supports the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment regarding seascape, landscape, and visual impacts is significantly lacking and does not adequately capture the scale of change or the sensitivity of the environment. The character of the West Lewis coastline is defined by an open Atlantic horizon, an undeveloped landscape, and a strong sense of remoteness. The proposed large-scale turbines, located near the shoreline, would introduce a continuous industrial presence that would fundamentally alter this character, leading to a permanent and irreversible transformation of the landscape.

The application fails to properly represent the extent of this visual change. The turbines'

size and proximity would dominate views from residential areas, historic sites, and popular coastal locations. This domination would directly affect visual amenity and compromise the essential qualities of naturalness and remoteness. The assessment does not effectively communicate the significance of this impact within the context of such a sensitive landscape.

There are methodological issues concerning the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, especially in relation to key cultural heritage sites and valued landscapes. This raises concerns that the visual impact may have been understated, which diminishes the reliability of the assessment.

Another significant deficiency is the lack of consideration of 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, visually and spatially linked to the Atlantic horizon. The assessment considers these assets in isolation 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, changing how heritage assets are experienced and severing their connection to the natural horizon. This represents not just a visual impact but also broader cultural and spatial harm that has not been sufficiently assessed in the application.

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4 concerning the protection of natural places and historic assets. The magnitude of change is at odds with the requirement to protect landscape character, visual amenity, and the setting of culturally significant sites. The lack of a solid worst-case assessment further weakens any assertion of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. Consequently, the resulting change is fundamental and permanent, rather than something that can be adequately reduced 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 impede a reliable evaluation and strengthen the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal is fundamentally flawed due to an incomplete assessment of construction and pollution risks, which fails to provide the necessary detail for evaluating environmental effects. Significant seabed preparation and installation works are planned within a high-energy Atlantic environment, yet there are no comprehensive

Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that would only be established after consent, thereby hindering any meaningful evaluation of their adequacy or effectiveness.

The reliance on unspecified future measures is alarming in light of the sensitivity of the receiving environment. The West Lewis coastline is known for its clean coastal waters and vital habitats, which are particularly susceptible to sediment disturbance and contamination. Although the application acknowledges risks, including sediment mobilisation and accidental chemical or oil spills, it falls short of providing adequate details on prevention, control, or monitoring strategies.

Moreover, there remains significant uncertainty about the scale and behaviour of sediment plumes generated from seabed disturbance and cable installation. In the absence of rigorous modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological ramifications of these impacts. This uncertainty also extends to the potential effects on marine species and habitats that have already been recognised as sensitive in broader assessments.

Further exacerbating these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent is granted, the application obstructs an assessment of whether effective safeguards will be in place to address pollution incidents. This not only introduces procedural risk but also weakens the competent authority's ability to appraise environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards is at odds with the requirements set out in the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation strategies be evaluated prior to consent; without this information, a lawful determination cannot be reached. The application also fails to demonstrate compliance with relevant policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The application under consideration presents a significant concern regarding the assessment of fisheries and marine life, which is inadequate and lacks a thorough evaluation of both ecological and socio-economic impacts. The coastal waters off West Lewis are home to a rich marine ecosystem and support an active fishing industry; however, the proposal does not provide evidence that these essential uses and habitats can be preserved or maintained without notable disruption.

A critical shortcoming lies in the presumption that fishing activities can be displaced without repercussions. The application fails to substantiate claims that there are alternative fishing grounds available, accessible, and able to accommodate any additional pressure. This lack of evidence is crucial, as displacement of fishing efforts could lead to overfishing in other areas and create broader economic ramifications for the local fishing fleet. Consequently, without a well-supported assessment, the potential impacts on fisheries and the livelihoods dependent upon them remain inadequately understood.

Moreover, the proposal poses considerable risks to marine species, particularly due to the underwater noise associated with construction activities. The use of high-energy hammer piling over extended durations is expected to disturb marine life over extensive distances, including species such as dolphins. The predicted disturbance to a significant portion of the local bottlenose dolphin population raises alarming issues, yet the application diminishes the importance of these potential effects without providing sufficient evidence.

Inconsistencies within the application further exacerbate concerns. While there is an acknowledgment of the necessity for licenses to permit harm to European Protected Species, the impacts are concurrently described as negligible. This contradiction not only undermines the credibility of the assessment but also raises doubts about compliance with the Habitats Regulations, especially in instances where anticipated harm would require legal authorisation.

The assessment also neglects to account for cumulative impacts resulting from multiple pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. An absence of a comprehensive evaluation regarding these cumulative effects hinders the ability to ascertain the overall implications for marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It falls short of showing that the development can coexist with current marine users or that it can avoid unacceptable impacts on marine biodiversity, thus obstructing any conclusion that the proposal represents sustainable development.

In summary, the deficiencies noted—including a lack of evidence regarding fishing displacement, an underestimation of acoustic impacts, and internal inconsistencies—render the assessment incomplete and unreliable. These shortcomings prevent a robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents a proposed project that lacks a complete assessment of onshore infrastructure, failing to account for the full spectrum of impacts related to an integrated system. The offshore turbines and onshore works are interlinked, yet they

have been evaluated separately, leading to a fragmented approach that obscures the overall environmental and socio-economic ramifications.

The onshore aspects encompass cabling traversing protected moorland, the construction of a substation in proximity to Stornoway, and the necessary access infrastructure through delicate landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, a significant carbon store and ecologically sensitive environment. The application does not present a thorough evaluation of these impacts, which impedes a complete understanding of the project's total environmental footprint.

By excluding or postponing the assessment of onshore impacts, the application hinders a proper appraisal of cumulative effects. The Environmental Impact Assessment process mandates that all facets of a project be considered collectively. However, the disjointed analysis of offshore and onshore elements results in an incomplete comprehension of the combined effects on peatlands, habitats, and communities.

Moreover, there are substantial risks posed to sensitive habitats, such as machair systems and peatland environments that are safeguarded by policy. The application fails to prove that the impacts on these habitats have been fully evaluated or that suitable avoidance measures have been implemented, highlighting a clear evidential gap concerning biodiversity protection.

Concerns also arise in relation to carbon balance, as the disturbance of peatland can release stored carbon, potentially incurring a carbon debt that contradicts the aims of renewable energy advancement. The application does not sufficiently address this concern or establish that the overall carbon balance is advantageous.

Additionally, the routing of infrastructure through active croft land presents potential conflicts with existing land use and legal rights. The application lacks evidence that the requisite consents or processes have been commenced, leading to uncertainties regarding deliverability and lawful execution.

From a policy standpoint, the failure to evaluate the project in its entirety 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 conclusion, the separation of project components, the lack of a comprehensive assessment, and the absence of evidence concerning environmental and land use impacts render this section of the application incomplete and unreliable, obstructing lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is renowned for its exceptionally dark skies, which are essential to the area's environmental quality, cultural identity, and tourism value.

However, the proposal introduces permanent red aviation lighting that will create a continuous and intrusive “wall of light” effect across the western horizon, fundamentally altering the night-time environment. The Environmental Impact Assessment fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experience of both residents and visitors. This is particularly concerning given the rising importance of dark skies to the identity of the area and the emerging tourism sector centred around astro-tourism.

Moreover, the application neglects to assess the impacts on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are known to be highly sensitive to artificial lighting due to phototaxis, which can lead to disorientation and increased risks of collision. The absence of a lighting impact assessment or phototaxis study means that the application does not consider how aviation lighting may negatively affect these species or contribute to increased mortality.

The reliance on daytime survey data in the ornithological assessment further exacerbates this issue, as it does not 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 lack of site-specific night-time data creates a significant gap in understanding the ecological impacts.

Without a thorough assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would suffer adverse effects. The necessary evidential standard to exclude any adverse effects beyond reasonable scientific doubt is not met, thus engaging the precautionary principle and hindering a lawful determination.

From a policy standpoint, the omission contradicts National Planning Framework 4, which pertains to the protection of natural places and environmental quality. It also undermines the overall evaluation of landscape and seascape impacts, as the character of the night-time environment is a crucial component of the ecosystem.

Collectively, 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 incapable of supporting a lawful determination.

TOURISM

The assessment related to tourism impacts is notably lacking and does not adequately address the economic and social implications for a critical sector of the Isle of Lewis economy. Tourism relies heavily on the region's wild coastline, near-pristine landscapes, dark skies, and overall sense of remoteness. While it is acknowledged that 86% of visitors are attracted by the scenery, the application fails to provide any quantified evaluation of how large-scale offshore infrastructure would influence visitor numbers, behaviour, or the overall economic contribution.

Tourism has experienced substantial growth, rising from £65 million in 2017 to more than £81.5 million, while supporting over 1,000 jobs and constituting up to 16% of the island's economy. However, the application does not explore how the industrialisation of the seascape and the resultant loss of environmental quality would impact Tourism Gross Value Added or the broader economic resilience of the area. This lack of analysis leaves it unclear whether the proposed development would yield a net economic benefit or jeopardise an established and burgeoning sector.

Moreover, the assessment neglects to consider the significance of environmental quality in enhancing tourism, particularly the value of unspoiled landscapes and dark skies for visitor experiences and emerging niches such as nature-based tourism and astro-tourism. The failure to include a Dark Skies Assessment exacerbates this shortcoming, creating a considerable gap in understanding the potential effects on an increasingly recognised segment of the local economy.

Given that the island community has limited economic diversification, the disregard for tourism impacts carries broader implications for employment, local businesses, and community sustainability. The absence of a comprehensive Island Communities Impact Assessment indicates that these economic vulnerabilities have not been examined as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, especially concerning economic impact and the necessity to illustrate net benefit. It stands in conflict with strategic goals that prioritise tourism as a vital growth sector, failing to provide adequate evidence for the competent authority to evaluate the economic ramifications of the proposal.

In summary, the shortcomings in quantifying tourism impacts, assessing the environmental influences on visitor behaviour, and acknowledging the island's economic dependency culminate in a substantial evidential void. This significantly hampers a thorough evaluation of the economic effects and reinforces the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm highlights significant procedural and evidential deficiencies that render it unfit for determination. It fails to meet the requirements of sustainable development as mandated by statutory duties and national policy. This application repeats the core issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. Despite now being presented under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it still does not provide a complete or reliable evidential basis for assessment.

Critical gaps exist in the baseline data, and the continued use of an undefined design

envelope raises further concerns. Additionally, there is an overreliance on unspecified mitigation measures, as well as the omission of significant impact pathways, including those affecting nocturnal wildlife, the full scope of onshore infrastructure, and potential effects on tourism. Consequently, the Environmental Impact Assessment remains incomplete, lacking the depth required to fully understand likely significant effects or residual impacts.

Procedural shortcomings are also evident. The absence of a compliant Island Communities Impact Assessment breaches the statutory duties under the Islands (Scotland) Act 2018. Furthermore, the failure to disclose the comprehensive Social Impact Assessment constitutes a material omission, hindering the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These issues alone are substantial enough to deem the application unsuitable for consideration.

In terms of national policy alignment, the proposal is in direct conflict with National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural environments, or cultural heritage. The health and wellbeing impacts have not been sufficiently addressed, nor has there been any evidence of net economic benefits, particularly given the lack of tourism impact modelling. Moreover, the cumulative effects of both offshore and onshore components have not been adequately evaluated, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertainties regarding environmental risks remain significant. The assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and exhibit internal inconsistencies. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt has not been fulfilled, invoking the precautionary principle and hindering a lawful conclusion regarding the acceptability of impacts.

This proposal would also lead to substantial and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, and the disruption of cultural and visual relationships, as well as impacts on tourism, would yield permanent effects that cannot be adequately mitigated.

In summary, the application suffers from extensive information deficiencies, policy conflicts, and unresolved environmental risks, rendering it procedurally and substantively unfit for determination. The competent authority must refuse consent based on these grounds or utilise the appropriate regulatory measures 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.

Additional Comments

I live in Uig and will be directly impacted by this horrendous project. In addition to all the negative impacts listed, there are absolutely no advantages for the island if this is allowed to go ahead. I’ve lost count of how many times we have objected to this and

how many meetings we've been to and said "No", and I don't know any local people who are in favour of it, and yet it keeps moving forward towards fruition. When are the islanders' views going to be taken into account?

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 9605D585

Member of the public 1051

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

Dear Sir/Madam

This representation constitutes a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The application fails to provide an adequate evidential basis for a lawful determination, as critical environmental data is missing, baseline information is limited and inconsistent, and key aspects of the proposal remain undefined. The reliance on a flexible design framework complicates the understanding of likely significant effects, while the unspecified mitigation measures mean their effectiveness cannot be assessed. Consequently, the documentation does not enable a full or informed understanding of environmental, cultural, or community impacts, and claims of negligible or non-significant effects are not supported by robust evidence.

There are clear and substantive policy conflicts within the proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application fails to demonstrate that national requirements to protect biodiversity, climate interests, and environmental integrity can be met. These conflicts directly impact the statutory tests required for consent and undermine the capacity of the competent authority to determine that the development is acceptable in policy terms.

The scale of the proposal is unprecedented in this location, as large turbines are positioned in close proximity to the shoreline. This raises significant concerns regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance illustrates that the application is incomplete and incapable of supporting a lawful determination. In such circumstances, the precautionary principle must apply. The proposal is located off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The scale, proximity, and design of the proposal raise fundamental concerns about its compatibility with statutory requirements, national policy, and the principles of sustainable development.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies, leading to an unreliable account of the likely environmental effects associated with the proposal. A notable issue is the reliance on a flexible Project Design Envelope, which lacks specific turbine dimensions, layouts, or configurations. This creates uncertainty and hinders the assessment of a worst-case scenario. Consequently, the integrity of

the evaluation is compromised, making it difficult for the public and the competent authority to comprehend the true environmental impacts.

Moreover, the application is heavily dependent on mitigation measures, monitoring strategies, and management plans that have yet to be established. Seeking consent based on the premise that potential environmental harm will be addressed later prevents any substantial evaluation of the effectiveness of these measures and the assessment of residual impacts. Such deferral of critical information to post-consent stages contradicts the objectives of the Environmental Impact Assessment regime, which necessitates that significant effects and mitigation strategies be clearly outlined before determination.

There are also notable evidential gaps, including insufficient baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This lack of robust supporting data results in uncertainty regarding the magnitude and significance of impacts, especially in instances where negligible or non-significant effects are asserted. The inadequacy of information hinders a proper understanding of cumulative and worst-case impacts, introducing scientific uncertainty that fails to meet statutory requirements.

As a result, the application does not satisfy the evidential threshold needed under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate alignment with the National Planning Framework 4, including obligations related to biodiversity protection and environmental integrity, as it cannot be demonstrated that impacts have been thoroughly assessed or that appropriate safeguards exist.

In conclusion, the combination of reliance on an undefined design envelope, absence of defined mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report incomplete and unreliable. These shortcomings prevent a lawful and robust assessment of environmental effects, leaving the competent authority unable to determine the application based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application fails to meet the statutory requirements of the Environmental Impact Assessment regime due to its materially inadequate assessment of alternatives. Instead of providing a structured and reasoned comparison of realistic alternatives based on their environmental effects, it offers a narrative account of project evolution. This method does not adequately demonstrate that less harmful options have been properly identified, assessed, and chosen over more damaging solutions.

There is a lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not show that the developer has genuinely considered placing turbines further offshore, where visual, ecological, and coastal impacts would likely be

lessened. The significance of the West Lewis coastline and the critical role of proximity to shore in determining impact mean that the absence of such analysis hinders any conclusion that the proposed siting is the least damaging option.

The shortcomings also extend to the assessments of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly explored to avoid or mitigate impacts on sensitive receptors, including areas of cultural and spiritual significance like Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis suggest that mitigation by design has not been applied, with undue reliance instead placed on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This represents a failure to adhere to the established mitigation hierarchy, preventing the competent authority from determining whether less harmful and more suitable alternatives are available. Without a comprehensive assessment of alternatives, it cannot be affirmed that the proposal is sustainable or compliant with policy.

From a policy standpoint, this deficiency undermines adherence to National Planning Framework 4, particularly concerning the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment constitutes a material omission that leads to the conclusion that the application has not been properly evaluated and cannot support a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment provided in the application is fundamentally flawed, particularly regarding the cultural heritage and community identity associated with the West Lewis coastline. This area is a living cultural landscape where the environment, language, tradition, and community are deeply interconnected. Instead of recognising these relationships, the application adopts a reductive perspective, treating heritage as a collection of isolated, static assets. Such an approach fails to acknowledge the ongoing social, cultural, and spiritual roles these elements play within the community.

A significant shortcoming is evident in how the assessment treats culturally important sites, specifically the cemeteries located at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet they are mischaracterised as mere static features. This misrepresentation ignores their continued use and significance, as well as the potential impacts of the proposed development on their surroundings. Consequently, the evaluation of cultural effects remains incomplete, overlooking the cemeteries' essential role in community life.

Additionally, the application neglects to consider intangible cultural heritage elements, which include the Gaelic language, local traditions, and the long-standing relationship between the community and the coastal environment. These aspects are vital to the area's identity but have been entirely omitted from the assessment, representing a

major oversight. Without addressing these components, a comprehensive understanding of the cultural impact of the development is unattainable.

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

Moreover, a critical procedural failure is the absence of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. The lack of this assessment prevents the competent authority from fulfilling its legal duty to evaluate the social, cultural, and economic impacts on the island community. This omission alone obstructs a lawful determination of the proposal.

From a policy standpoint, these identified deficiencies directly conflict with the National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to consider both tangible and intangible heritage, alongside a recognition of living cultural practices, signifies a clear deviation from policy obligations.

In conclusion, the combined failures to assess living heritage, intangible cultural values, community rights, and statutory requirements create a significant evidential gap. The cultural impacts of the proposed development have not been adequately evaluated, and the application fails to provide a sufficient basis for determining the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The evaluation of social impacts, health, and wellbeing lacks the necessary transparency for a lawful assessment. While a Social Impact Assessment was commissioned by the developer, including focus groups with local residents, the complete report has not been made available. This absence of information creates a significant evidential gap, hindering 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 stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts stem from direct engagement and are not mere speculation. However, the failure to disclose the complete assessment prevents thorough scrutiny of these findings, limiting the capacity to evaluate their significance in the decision-making process.

Furthermore, the proposal is viewed as a threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. Despite this recognition, such

impacts have not been sufficiently integrated into the application or given adequate consideration. The withholding of the full Social Impact Assessment obscures the true social and human costs associated with the development.

This lack of transparency compromises the Environmental Impact Assessment process. Understanding social, economic, and health impacts is crucial for developments of this scale, particularly those that may affect community character and functioning. Without the complete dataset, the application does not provide a comprehensive evidential basis for weighing benefits against harm.

From a policy standpoint, the application fails to align with National Planning Framework 4 regarding health and wellbeing. Developments are required to promote positive health outcomes and mitigate harm, yet the available evidence suggests existing adverse effects that have not been fully revealed. Without the full assessment, compliance with this policy cannot be verified.

The procedural ramifications are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This constitutes a material omission within the application and a failure to satisfy the evidential standards of the Environmental Impact Assessment framework.

In conclusion, the non-disclosure of the complete Social Impact Assessment, alongside evidence of existing adverse impacts, leads to an incomplete and unreliable assessment. This hinders a lawful determination and confirms that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline, characterised by its expansive Atlantic horizon and an undeveloped nature, contributes to a strong sense of remoteness. The proposed large-scale turbines, situated close to the shoreline, would introduce a continuous industrial presence that fundamentally alters this unique character, leading to an irreversible transformation of the landscape. The application fails to adequately convey the magnitude of this visual change. The turbines would dominate views from residential areas, historic sites, and frequently visited coastal locations, impacting visual amenity and diminishing the inherent qualities of naturalness and remoteness.

Concerns arise regarding the selection and presentation of visual viewpoints within the assessment. Evidence suggests these viewpoints may not effectively represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the visual impact has been understated, which in turn undermines the assessment's reliability.

Moreover, the application does not consider the interconnectedness of landscape, seascape, and cultural heritage adequately. Significant sites, such as the Calanais Standing Stones and other Scheduled Monuments, form part of a broader landscape

setting that is visually and spatially linked to the Atlantic horizon. Treating these sites as isolated entities fails to recognise their interdependence, resulting in an incomplete assessment of impacts on their setting and cultural significance. The introduction of industrial elements to the seascape would disrupt these relationships, altering the context in which heritage assets are perceived and severing their connection to the natural horizon. This constitutes not merely a visual impact but also broader cultural and spatial harm that the application has not sufficiently assessed.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4 regarding the protection of natural environments and historic assets. The extent of change proposed does not align 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 assertion of compliance with policy.

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

In summary, the assessment inadequately represents the extent of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings hinder a dependable evaluation and support the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal raises significant concerns regarding the adequacy of the assessment of construction and pollution risks, which remains incomplete and lacks the necessary detail for evaluating the potential environmental effects. With substantial seabed preparation and installation works taking place in a high-energy Atlantic environment, the absence of fully developed Construction Environmental Management Plans and Pollution Prevention Plans is particularly troubling. The application appears to depend on the preparation of mitigation and contingency measures post-consent, which inhibits any meaningful assessment of their efficacy.

This reliance on undefined future measures is especially alarming given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are at risk of 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 how these risks will be prevented, controlled, or monitored.

There is also considerable uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without comprehensive modelling and clearly defined management strategies, it is impossible

to ascertain the extent, duration, or ecological impacts of these disturbances. This uncertainty extends to potential effects on marine species and habitats that have already been identified as sensitive within the wider assessment.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent is granted, the application prevents a thorough evaluation of whether appropriate safeguards will be in place to address pollution incidents. This creates procedural risks and undermines the competent authority's ability to assess environmental protection measures at the determination stage.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements established by the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation measures be evaluated prior to granting consent; absent this information, a lawful determination cannot be achieved. Furthermore, the application does not demonstrate compliance with relevant policy requirements concerning environmental protection and water quality.

In summary, the lack of clearly defined mitigation measures, absence of detailed management plans, and uncertainty about potential impacts culminate in a materially deficient assessment. These deficiencies hinder a thorough evaluation of construction and pollution risks, further substantiating the argument that the application is incomplete.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents a range of significant risks and gaps that undermine its reliability and legality. The routing of infrastructure through active croft land raises concerns over potential conflicts with existing land use and legal rights. There is insufficient evidence provided to demonstrate that the necessary consents or processes have been initiated, which calls into question the deliverability and lawful implementation of the project.

The proposal also fails to adequately address the critical issue of carbon balance. Disturbances to peatland release stored carbon, leading to a carbon debt that could contradict the aims of renewable energy development. Without demonstrating that the overall carbon balance remains beneficial, the application lacks a crucial component necessary for a proper assessment.

Moreover, there are serious implications for sensitive habitats such as machair systems and peatland environments that are afforded policy protection. The application does not show that these habitats have been thoroughly assessed or that appropriate avoidance measures have been implemented, indicating a clear evidential gap regarding biodiversity protection.

The assessment of onshore infrastructure is fundamentally flawed and incomplete,

failing to consider the interconnected nature of the offshore turbines and onshore works. This fragmented approach obscures the true scale of environmental and socio-economic effects that arise from what is a single integrated project. The onshore components, including cabling across protected moorland and the construction of a substation near Stornoway, involve excavation in areas of deep peat, particularly within Barvas Moor, which is a significant carbon store and ecologically sensitive habitat. The lack of a comprehensive assessment of these impacts hinders a full understanding of the project's overall environmental footprint.

Additionally, the separation of offshore and onshore elements prevents the proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project are considered together. However, by treating them separately, the combined impacts on peatlands, habitats, and communities remain inadequately understood.

From a policy standpoint, the failure to evaluate the project as a whole and demonstrate protection for peatlands, habitats, and land use interests is in conflict with the National Marine Plan and National Planning Framework 4. The inability to prove that impacts can be avoided or mitigated further diminishes the application's validity. Collectively, these factors render this part of the application incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The 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 will fundamentally alter the night-time environment of the West Lewis coastline, which is known for its exceptionally dark skies, a key aspect of the area's environmental quality, cultural identity, and tourism value.

The Environmental Impact Assessment is notably lacking in its evaluation of the effects this lighting will have on visual amenity, landscape character, and the experiences of both residents and visitors. The significance of dark skies to the region's identity, particularly in light of emerging tourism sectors such as astro-tourism, makes this omission even more critical. Without addressing the potential impacts of the proposed lighting, there exists a clear gap in the overall assessment of landscape and environmental factors.

Furthermore, there is no analysis of the potential effects on nocturnal wildlife, with key species like the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel being highly sensitive to artificial lighting. These species experience disorientation due to phototaxis, which may increase the risk of collisions. The application fails to include any impact assessment regarding lighting or a study on phototaxis, thereby neglecting to evaluate how the proposed aviation lighting could affect these birds or lead to increased mortality.

The ornithological assessment relies on daytime survey data, which fails to capture

nocturnal activity or the associated risks that nocturnal species face. Birds such as Kittiwakes, which may forage or migrate at night, could also be disoriented by artificial lighting, but this risk has not been assessed. The lack of site-specific night-time data leaves a critical gap in understanding the ecological impacts.

The absence of an assessment concerning nocturnal impacts makes it impossible to determine whether protected species or designated sites may be adversely affected. The necessary evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, which engages the precautionary principle and precludes a lawful determination.

From a policy standpoint, this omission stands in conflict with National Planning Framework 4, which pertains to the protection of natural places and environmental quality. It also compromises the broader evaluation of landscape and seascape impacts, as the character of night-time environments is an integral component of the overall environment.

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

TOURISM

The economic impact assessment related to tourism is severely inadequate and does not address the consequences for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, nearly untouched landscapes, dark skies, and a sense of remoteness. The application acknowledges that 86% of visitors are attracted by the scenery, yet it fails to provide a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contributions from tourism.

Since 2017, tourism has seen substantial growth, rising from £65 million to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island’s economy. Nonetheless, the application does not consider how the industrialisation of the seascape and degradation of environmental quality could affect Tourism Gross Value Added or the wider economic resilience of the area. Without such crucial analysis, it remains unclear whether the proposed development would yield a net economic benefit or detract from an already established and expanding sector.

The assessment neglects to recognise the significance of environmental quality in bolstering tourism, particularly the value of unspoiled landscapes and dark skies for visitor experiences and emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, resulting in a considerable gap in understanding the potential impacts on an acknowledged and growing segment of the local economy.

In an island community characterised by limited economic diversification, the oversight in evaluating tourism impacts has broader implications for employment, local enterprises, and community sustainability. The failure to provide a compliant Island Communities Impact Assessment means these economic vulnerabilities remain unexamined, as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4, particularly concerning economic impact and the obligation to prove net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector and lacks sufficient evidence to permit the competent authority to evaluate the economic ramifications of the proposal.

All these factors combined—the failure to quantify tourism impacts, the oversight of environmental influences on visitor behaviour, and the disregard for the island's economic dependencies—culminate in a significant evidential gap. This inhibits a thorough assessment of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm presents serious issues regarding its compliance with sustainable development standards, statutory duties, and national policy. It mirrors the fundamental problems that led to the refusal of the Lewis Wind Power proposal in 2008, particularly concerning the unacceptable scale of industrialisation. This current proposal emerges within a stronger policy context that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it fails to adequately address these critical areas.

Significant deficiencies in the application prevent a comprehensive evaluation. It lacks a complete and reliable evidential foundation, with notable gaps in baseline data, an undefined design envelope, unspecified mitigation measures, and overlooked impact pathways such as nocturnal wildlife, onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment remains incomplete, failing to provide insight into likely significant effects or residual impacts.

Furthermore, procedural inadequacies are evident. The lack of a compliant Island Communities Impact Assessment violates statutory obligations under the Islands (Scotland) Act 2018, and the omission of a full Social Impact Assessment is a critical flaw. These shortcomings hinder the competent authority’s ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal directly contradicts the National Planning Framework 4, which necessitates the protection of biodiversity, natural places, and cultural heritage. It does not adequately demonstrate that health and wellbeing impacts are acceptable, nor does it provide evidence of a net economic benefit due to the absence of tourism impact modelling. Moreover, the cumulative impacts of both offshore and onshore

components have not been thoroughly assessed, leaving uncertainties regarding effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain significant and uncertain. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, contradictory. The evidential standard needed to rule out adverse effects beyond reasonable scientific doubt has not been achieved, necessitating a precautionary approach that prevents a lawful conclusion regarding the acceptability of impacts.

Additionally, the proposal would cause substantial and irreversible changes to a sensitive landscape. The industrialisation of the Atlantic-facing coastline would lead to the loss of dark skies and disrupt cultural and visual relationships, with permanent effects on tourism that cannot be mitigated satisfactorily.

In summary, the application is both procedurally and substantively unfit for determination. The combination of information deficiencies, policy conflicts, and unresolved environmental risks inhibits a lawful, 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

Massive impact environmentally, visually, on livelihoods and cost of living. For very little community benefit to mitigate these costs. The most expensive electricity in the whole of the UK. The Vikings were polite and friendly when they came. This is daylight robbery.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 97501DFB

Member of the public 1052

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted in accordance with relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a review of the Environmental Impact Assessment Report and accompanying documentation, highlighting significant deficiencies in planning, environmental, cultural, and procedural areas. 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 robust cultural identity. Concerns have been raised regarding the compatibility of the proposal with statutory requirements, national policy, and the principles of sustainable development, especially in light of its scale, proximity, and design.

The application presents a troubling lack of sufficient evidential support for a lawful determination. There are crucial gaps in environmental data, and baseline information is both limited and inconsistent, leaving many aspects of the proposal undefined. The flexible design framework employed obscures a clear understanding of the likely significant effects, while the reliance on unspecified mitigation measures renders their effectiveness impossible to evaluate. Consequently, the documentation does not facilitate a comprehensive or informed assessment of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidence.

There are evident and serious policy inconsistencies with the proposal. It seems to contravene 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. Furthermore, the application does not convincingly demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly undermine the statutory tests required for consent and hinder the competent authority's ability to affirm the development's acceptability in policy terms.

The unprecedented scale of this proposal, characterised by large turbines situated in close proximity to the shoreline, raises significant concerns about landscape capacity, visual dominance, and environmental impact. Collectively, the deficiencies in information provided, the reliance on undefined mitigation measures, the evidential weaknesses, and the clear policy non-compliance signify that the application is incomplete and inadequate for lawful determination. Under these circumstances, it is imperative that the precautionary principle be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is insufficient and fails to deliver a comprehensive, transparent, or dependable account of the anticipated environmental effects associated with the proposal. The introduction of a flexible Project Design Envelope, lacking commitment to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty and hinders the consistent application of a worst-case scenario. This compromises the assessment's integrity, meaning that the impacts outlined may not accurately represent the development that will eventually be constructed. Consequently, both the public and the competent authority are deprived of a clear understanding of the true environmental effects.

The application places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Consequently, consent is sought with the assumption that environmental harm will be managed at a later date. This prevents any meaningful evaluation of the effectiveness of these measures or an assessment of residual impacts. The deferral of crucial information to stages post-consent is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be thoroughly established before determination.

There exist significant evidential shortcomings, such as gaps in baseline data, limitations in methodology, and a reliance on assumptions rather than site-specific evidence. These deficiencies lead to uncertainty regarding the scale and significance of the impacts, particularly where claims of negligible or non-significant effects are made without robust supporting evidence. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, generating scientific uncertainty that cannot be aligned with statutory requirements.

As a result, the application does not meet the evidential standards set forth in the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, which includes stipulations related to biodiversity protection and environmental integrity, as it cannot be established that impacts have been comprehensively assessed or that appropriate safeguards are in place.

Overall, the combination of reliance on an undefined design envelope, the absence of specific mitigation measures, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies obstruct a lawful and robust assessment of environmental effects, thereby preventing the competent authority from making an informed decision based on the information presented.

ASSESSMENT OF ALTERNATIVES

The West Lewis coastline is particularly sensitive, making the proximity to shore a crucial factor in determining environmental impact. Unfortunately, the assessment of alternatives within the application is materially inadequate and does not comply with

the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a well-structured and reasoned comparison of realistic alternatives based on their environmental effects, the application merely recounts the project's evolution. This narrative approach fails to show that less harmful options have been properly identified, assessed, and selected over more damaging solutions.

There is a notable absence of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not convincingly demonstrate that the developer has seriously considered placing turbines further offshore, where the potential visual, ecological, and coastal impacts would likely be lessened.

These deficiencies also extend to the evaluation of cable routing and landfall assessment, as there is inadequate evidence suggesting that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant sites like Barvas Cemetery. The lack of a clear strategy to avoid such impacts and the insufficient comparative analysis highlight that mitigation by design has not been effectively utilised, leading to an over-reliance on post-design mitigation measures.

Consequently, the application fails to show that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This represents a significant failure to adhere to the established mitigation hierarchy, preventing the competent authority from determining whether less harmful and more suitable alternatives are available. Without a robust assessment of alternatives, it is impossible to conclude that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this inadequacy compromises compliance with National Planning Framework 4, particularly regarding the protection of natural places, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment constitutes a material omission, contributing to the overall conclusion that the application has not been sufficiently assessed and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species is critically flawed and fails to provide a comprehensive or reliable 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, and the methodologies employed do not adequately identify species presence, behaviour, and habitat utilisation. Consequently, the assessment lacks a solid evidential foundation necessary for evaluating potential impacts.

A significant shortcoming pertains to otters, which are classified as a European Protected Species. The application does not sufficiently acknowledge or evaluate their active use of coastal areas for foraging and movement. The oversight regarding their

core foraging range and behavioural patterns means that the potential impacts of construction activities, noise, and increased human presence have not been thoroughly assessed. This oversight compromises any assertions regarding the absence of significant effects on this species.

Further issues arise in the evaluation of basking sharks, where reliance on aerial surveys introduces considerable detection bias, especially in Atlantic conditions. This approach is prone to underestimating the presence of these sharks, particularly when compared to established land-based observations that demonstrate frequent use of these waters. The failure to incorporate or adequately consider such data contributes to an incomplete baseline and undermines the reliability of the conclusions drawn.

These methodological shortcomings result in conclusions of negligible or non-significant effects being based on assumptions rather than on robust evidence. The lack of adequate baseline data obstructs a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This introduces uncertainty regarding the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and the National Planning Framework 4, as there has been an inadequate identification and assessment of protected species. The uncertainty created by these deficiencies inhibits the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, the grant of consent cannot be justified.

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

ORNITHOLOGY AND SEABIRD IMPACTS

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

A key contradiction exists within the application, as the developer claims there are no significant adverse effects while also submitting a Habitats Regulations derogation case, which is required only when significant harm is anticipated. This inconsistency raises concerns about the reliability of the assessment and suggests that the

conclusions drawn are not backed by solid evidence. The assessment does not sufficiently prove that seabirds linked to protected sites like the Lewis Peatlands and St Kilda will be unaffected. The importance of these feeding grounds is inadequately addressed, and reliance on modelling introduces uncertainty, especially for declining species such as Kittiwakes and Fulmars. The methods used are likely to underestimate mortality, particularly due to incomplete baseline data and a lack of understanding regarding behavioural responses.

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

The identified deficiencies also breach the requirements of the National Planning Framework 4 regarding biodiversity protection and the conservation of natural assets. The failure to demonstrate that internationally significant seabird populations will remain unaffected places the proposal in direct opposition to national policy. Collectively, these issues render the assessment unreliable due to internal contradictions, methodological flaws, and inadequate evidence, which hinder a comprehensive evaluation of impacts and lead to the conclusion that the application does not fulfil the statutory criteria needed for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The application proposes a development that inadequately addresses the assessment of cultural heritage and community identity, neglecting to recognise the West Lewis coastline as a living cultural landscape where environment, language, tradition, and community are deeply intertwined. It adopts a reductive perspective that views heritage as a collection of isolated, static assets, overlooking their ongoing social, cultural, and spiritual significance within the community.

A critical shortfall in the assessment is the treatment of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas. These locations are active sites of burial and spiritual practice, yet they are classified merely as static features. This mischaracterisation fails to account for their continued use and meaning, as well as the potential impacts of the development on their settings, leading to an incomplete understanding of cultural effects and disregarding their importance in community life.

Additionally, the assessment overlooks intangible cultural heritage, such as the Gaelic language and traditions, as well as the long-standing connection between the community and the coastal environment. These elements are central to the area’s

identity but are notably absent from the evaluation, representing a significant oversight. Without considering these factors, the cultural impact of the development cannot be comprehensively understood.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population possesses a distinct cultural identity akin to that of Indigenous Peoples; however, there has been no process of Free, Prior and Informed Consent undertaken. The lack of meaningful engagement undermines the assessment's legitimacy and fails to reflect established principles regarding participation in matters impacting cultural and environmental interests.

Furthermore, there is a critical procedural failing in the absence of a compliant Island Communities Impact Assessment, which is a statutory requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to fulfil its legal obligations to evaluate the social, cultural, and economic impacts on the island community, rendering any determination unlawful.

From a policy standpoint, these deficiencies put the proposal at odds with National Planning Framework 4, particularly concerning the protection of historic assets and places. The neglect to account for both tangible and intangible heritage, alongside the failure to acknowledge living cultural practices, signifies a departure from policy requirements.

Overall, the shortcomings in assessing living heritage, intangible cultural values, community rights, and adherence to statutory obligations create a significant evidential gap. The cultural impacts of the development have not been adequately assessed, and the application fails to provide a sufficient basis for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer commissioned a Social Impact Assessment that involved focus groups with local residents; however, the complete report has not been published. This significant evidential gap limits both public understanding and the competent authority's ability to evaluate the social risks identified in the developer's research. The absence of the full assessment not only inhibits proper scrutiny of the findings but also restricts the determination of the significance of these impacts within the decision-making process.

Summaries of the assessment suggest that residents are currently experiencing measurable stress, anxiety, and concern due to the proposal's scale and proximity. These impacts are based on direct engagement and are therefore not speculative. Additionally, there is evidence indicating that the proposal poses a direct threat to community identity and cohesion, with findings from the developer indicating a risk of “cultural loss.” Yet, these impacts have not been adequately integrated into the main application nor given appropriate consideration.

The withholding of the full Social Impact Assessment obscures the true human and social costs of the proposed development, undermining the Environmental Impact Assessment process. It is crucial to have a complete understanding of the social, economic, and health impacts for developments of this scale, especially where community character may be affected. By failing to provide the complete dataset, the application does not present a thorough evidential basis to assess the balance between potential benefits and harms.

From a policy standpoint, the application does not demonstrate compliance with the National Planning Framework 4 regarding health and wellbeing. Development should foster positive health outcomes and avoid harm, yet the available evidence points to existing adverse effects that have not been fully revealed. Without the full assessment, it is impossible to establish compliance with this policy.

The procedural implications of this situation are significant. The competent authority cannot conduct a rigorous socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a material omission in the application and indicates a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

Overall, the non-disclosure of the full Social Impact Assessment, in conjunction with the evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This situation hampers a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is inadequate and does not properly represent the extent of change or the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by its open Atlantic horizon, its undeveloped nature, and a strong sense of remoteness. The proposed large-scale turbines, situated close to the shoreline, would establish a continuous industrial presence, significantly altering this character and leading to a permanent and irreversible change in the landscape.

There is also a lack of clarity in the application regarding the magnitude of the visual change. Given their scale and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This would negatively impact visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not adequately convey the extent of this impact or its importance within such a sensitive landscape.

Methodological issues arise from the selection and presentation of visual viewpoints. It appears that the viewpoints may not represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and valuable landscapes. This may lead to an understatement of the visual impact, which questions the reliability of the assessment.

Moreover, the assessment does not 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 setting, linked visually and spatially to the Atlantic horizon. By treating these sites as isolated entities, the assessment overlooks their interdependence, resulting in an incomplete evaluation of impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are perceived and their connection to the natural horizon. This change is not merely a visual impact; it represents a broader cultural and spatial harm that has not been thoroughly evaluated in the application.

From a policy standpoint, the proposal contradicts National Planning Framework 4, which seeks to protect natural areas and historic assets. The proposed scale of change is at odds with the need to preserve landscape character, visual amenity, and the setting of culturally significant sites. The lack of a comprehensive worst-case assessment further diminishes the argument for policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. Due to the size, height, and proximity of the turbines, their presence would be overwhelming and unavoidable. The resulting changes are fundamental and permanent, rather than something that can be lessened to an acceptable degree through mitigation efforts.

In summary, the assessment fails to accurately portray the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is not compatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks sufficient detail concerning construction and pollution risks, rendering the assessment materially deficient. It involves significant seabed preparation and installation works within a high-energy Atlantic environment, yet fails to provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that would be devised post-consent. This reliance on undefined future measures raises serious concerns, particularly given the sensitivity of the receiving environment, which includes the West Lewis coastline that is home to clean coastal waters and important habitats vulnerable to sediment disturbance and contamination.

While the application does acknowledge risks such as sediment mobilisation and accidental chemical or oil spills, it does not adequately detail the strategies for preventing, controlling, or monitoring these risks. Moreover, there exists uncertainty regarding the scale and behaviour of sediment plumes that may arise from seabed disturbance and cable installation. The absence of robust modelling and clearly defined management strategies leaves unanswered questions about the extent,

duration, and ecological impacts of these disturbances. This uncertainty also extends to potential effects on marine species and habitats, which have already been identified as sensitive within the broader assessment.

Furthermore, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application inhibits the assessment of whether suitable safeguards are established to address pollution events. 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, the postponement of critical environmental safeguards is in conflict with the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be assessed prior to granting consent, and the absence of this information prevents a lawful determination. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality. Collectively, these deficiencies obstruct a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is fundamentally incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry. However, the application under review fails to adequately protect or maintain these critical habitats and uses, leading to significant concerns regarding ecological and socio-economic impacts. The assessment of fisheries and marine life is lacking, particularly in its evaluation of fishing displacement, which is presumed to occur without consequence. There is no evidence presented that alternative fishing grounds are accessible or can sustain additional pressure, a significant oversight that raises the risk of overfishing and potential economic fallout for the local fleet.

Moreover, the proposal poses considerable risks to marine species, especially due to underwater noise from construction activities. The high-energy hammer piling anticipated over an extended duration is likely to disturb marine life across vast distances, impacting species such as dolphins. Concerns have been raised about the predicted disturbance affecting a substantial part of the local bottlenose dolphin population, yet the application downplays the significance of these effects without adequate supporting evidence.

The application also reveals contradictions, acknowledging the necessity for licences for any harm to European Protected Species while simultaneously characterising the impacts as negligible. This inconsistency undermines the assessment's credibility and raises questions about compliance with the Habitats Regulations, particularly where potential harm is identified that may warrant legal authorisation.

Cumulative impacts resulting from habitat disturbance, noise, and the displacement of fishing activities have not been sufficiently evaluated. The lack of a comprehensive

assessment of these combined effects leaves the overall implications for marine ecosystems and socio-economic conditions unclear.

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 how the development can coexist with existing marine users or avoid unacceptable consequences for marine biodiversity, precluding any assertion that the proposal constitutes sustainable development.

In summary, the deficiencies in evidence concerning fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies compromise the reliability of the assessment, thereby obstructing a thorough evaluation of the effects on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed project presents significant shortcomings in its assessment of onshore infrastructure, which is incomplete and does not encompass the full range of impacts stemming from what constitutes a single integrated project. The onshore works, which include cabling across protected moorland, the construction of a substation near Stornoway, and the establishment of access routes through sensitive landscapes, are intrinsically linked to the offshore turbines. However, these components are assessed separately, leading to a fragmented approach that obscures the true scale of environmental and socio-economic effects.

The absence of a thorough assessment of the impacts associated with the onshore elements particularly fails to address the implications of excavation across areas of deep peat, especially within Barvas Moor, a significant carbon store and ecologically sensitive habitat. This gap in the assessment prevents a comprehensive understanding of the overall environmental footprint of the project.

Furthermore, the application's exclusion or deferral of the evaluation of onshore impacts hinders the proper assessment of cumulative effects. The Environmental Impact Assessment process mandates that all parts of a project be examined collectively; however, the disjointed evaluation of offshore and onshore elements leaves the combined impacts on peatlands, habitats, and communities inadequately understood.

There are also serious concerns regarding potential risks to sensitive habitats such as machair systems and peatland environments, which are afforded policy protection. The application lacks evidence that these impacts have been fully assessed or that appropriate measures to avoid them have been established, revealing a substantial evidential gap in relation to biodiversity protection.

The proposal raises additional issues related to carbon balance, as the disturbance of peatland releases stored carbon, potentially resulting in a carbon debt that contradicts the objectives of renewable energy development. The application does not sufficiently

address this critical issue or demonstrate that the overall carbon balance remains favourable.

Moreover, the routing of infrastructure through active croft land presents possible conflicts with existing land use and legal rights. There is a lack of evidence confirming that the necessary consents or processes have been initiated, which raises concerns about the deliverability and lawful implementation of the project.

From a policy standpoint, the failure to assess the project in its entirety and to demonstrate the protection of peatlands, habitats, and land use interests is 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.

Collectively, the fragmentation of project components, the lack of comprehensive assessment, and the insufficient evidence regarding environmental and land use impacts render this aspect of the application incomplete and unreliable, which in turn obstructs a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal introduces permanent red aviation lighting that would be visible over long distances, creating an intrusive "wall of light" effect across the western horizon. This change would fundamentally alter the night-time environment of the West Lewis coastline, which is characterised by exceptionally dark skies. These dark skies are vital to the area's environmental quality, cultural identity, and tourism value, yet the Environmental Impact Assessment completely omits any consideration of dark skies and nocturnal wildlife.

The application fails to evaluate the impact of this lighting on visual amenity, landscape character, and the experience of residents and visitors, despite the significant importance of dark skies to local identity and emerging tourism sectors, including astro-tourism. This lack of assessment creates a clear gap in the overall landscape and environmental evaluation.

Moreover, the assessment does not address the potential impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are sensitive to artificial lighting due to their phototactic responses, which can lead to disorientation and increased collision risk. The application lacks a lighting impact assessment or phototaxis study, failing to evaluate how the proposed aviation lighting could affect these species or raise mortality rates.

This omission is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which overlooks nocturnal activity and associated risks. Species such as Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this risk has not been examined. The absence of site-specific night-time data creates a critical gap in understanding the ecological impacts.

Without a proper assessment of nocturnal impacts, it cannot be determined whether protected species or designated sites would suffer adverse effects. The necessary evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, which engages the precautionary principle and prevents lawful determination.

From a policy standpoint, this omission is at odds with National Planning Framework 4 regarding the protection of natural places and environmental quality. Additionally, it undermines the broader assessment of landscape and seascape impacts, as the character of night-time is an integral aspect of the environment.

In summary, the lack of any assessment of 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 incapable of supporting a lawful determination.

TOURISM

The evaluation of the tourism impacts associated with this application is significantly lacking, particularly regarding the economic and social repercussions for a vital part of the Isle of Lewis economy. The local tourism industry relies heavily on the region's wild coastline, near-pristine landscapes, dark skies, and the feeling of remoteness. While the application acknowledges that 86% of visitors are attracted by the scenery, it does not provide a quantified assessment of how the introduction of large-scale offshore infrastructure could influence visitor numbers, behaviours, or overall economic contributions.

Tourism on the Isle of Lewis has experienced remarkable growth, rising from £65 million in 2017 to over £81.5 million, creating more than 1,000 jobs and representing up to 16% of the island's economy. However, the application neglects to model the potential consequences of seascape industrialisation and environmental degradation on Tourism Gross Value Added and the resilience of the wider economy. Without this critical analysis, it remains unclear whether the proposed development would provide a net economic benefit or jeopardise an established and expanding sector.

Moreover, the assessment overlooks the significance of environmental quality in enhancing tourism, particularly the value of unspoiled landscapes and dark skies for visitor experiences and emerging sectors such as nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this oversight, creating a considerable gap in understanding how the proposal may impact a recognised and growing segment of the local economy.

In an island community with limited economic diversification, the neglect of tourism impact assessments poses broader implications 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

thoroughly examined, as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application fails to illustrate compliance with National Planning Framework 4, particularly concerning economic impacts and the necessity to demonstrate net benefit. It also stands in conflict with strategic objectives that prioritise tourism as a growth sector, lacking sufficient evidence for the competent authority to evaluate the economic ramifications of the proposal.

Collectively, the inability to quantify tourism impacts, assess environmental factors influencing visitor behaviour, and acknowledge the island's economic dependencies results in a significant evidential gap. This undermines a thorough evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development, as assessed against 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. This current application, despite being presented under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, does not provide a complete or reliable evidential basis for determination.

There are critical gaps in baseline data, reliance on an undefined design envelope, and unspecified mitigation measures. Furthermore, significant impact pathways such as nocturnal wildlife, complete onshore infrastructure, and tourism effects have been omitted. Consequently, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of the likely significant effects or residual impacts.

Procedural failures are also evident. The lack of a compliant Island Communities Impact Assessment breaches the statutory duty under the Islands (Scotland) Act 2018, while the failure to disclose the full Social Impact Assessment is a material 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 is in direct conflict with National Planning Framework 4. It does not demonstrate protection for biodiversity, natural places, and cultural heritage. Moreover, it fails to establish that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, particularly due to the absence of tourism impact modelling. The cumulative impact of both offshore and onshore elements has not been adequately assessed, obscuring effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties regarding environmental risks remain significant. The assessments

concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also inconsistent in places. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been achieved. This engages the precautionary principle and prevents a lawful conclusion regarding the acceptability of impacts.

Moreover, 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 impacts on tourism represent permanent effects that cannot be mitigated to an acceptable level.

Considering all these factors, the application is both procedurally and substantively unfit for determination. The scale of information deficiencies, combined with policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. Therefore, the competent authority must refuse consent on these grounds or invoke the relevant regulatory provisions to require the submission of the missing information.

In light of these issues, 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 totally object to the intrusion on the communities and the scenic value of Scotland's landscape being raped.
The energy that will be generated from these huge structures will not benefit the island communities. Politicians, councillors and these mega companies need to listen to the people it will affect. The people that live here's concerns and objections should not come second to multi national companies at our expense.

Sincerely
[Redacted]

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 71B03B7E

Member of the public 1053

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. The objection is rooted in a review of the Environmental Impact Assessment Report and associated documentation, which reveals significant deficiencies in planning, environmental, cultural, and procedural areas. The proposed development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline and rich cultural identity, as well as its near-pristine environment.

The application lacks sufficient evidence for a lawful decision. Important environmental data is absent, and the baseline information provided is both limited and inconsistent. Key elements of the proposal remain undefined. The use of a flexible design framework obscures an understanding of the likely significant effects, while unspecified mitigation measures hinder any assessment of their potential effectiveness. Consequently, the provided documentation fails to offer a comprehensive understanding of the environmental, cultural, or community impacts, making the claims of negligible or non-significant effects unsupported.

Furthermore, there are notable conflicts with established policies. 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 sufficiently demonstrate adherence to national requirements to protect biodiversity, climate interests, and environmental integrity. These issues directly impact the statutory tests required for consent and challenge the competent authority's ability to assess the development's acceptability within policy frameworks.

The scale of the proposal is unprecedented for this area, with large turbines situated near the shoreline, raising serious concerns about landscape capacity, visual dominance, and environmental impacts. The combination of inadequate information, reliance on undefined mitigation measures, evidential weaknesses, and clear policy violations indicates that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application presents a deeply concerning reliance on an undefined Project Design Envelope, lacking any firm commitment to specific turbine dimensions, layouts, or configurations. This ambiguity introduces substantial uncertainty, hindering the ability to apply a worst-case scenario consistently. As a result, the Environmental Impact

Assessment Report fails to deliver a full, transparent, or reliable account of the likely environmental effects of the proposal. The implications of this deficiency are profound, as the assessment's integrity is compromised, preventing both the public and the competent authority from fully grasping the true extent of the environmental impacts.

Moreover, the application hinges on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent under the premise that environmental harm will be addressed later undermines any meaningful evaluation of effectiveness or assessment of residual impacts. This deferment of critical information to post-consent stages is procedurally unacceptable and contradicts the fundamental purpose of the Environmental Impact Assessment regime, which mandates the clear establishment of likely significant effects and mitigation prior to determination.

Compounding these issues are significant evidential deficiencies, such as gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This lack of robust supporting data leads to uncertainty regarding the scale and significance of the impacts, particularly where conclusions of negligible or non-significant effects are drawn. The absence of sufficient information not only obscures a clear understanding of cumulative and worst-case impacts but also introduces scientific uncertainty that fails to meet statutory requirements.

As a result, the application does not meet the evidential threshold required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, as it cannot establish that impacts have been thoroughly assessed or that appropriate safeguards are in place.

In summary, the combination of reliance on an unspecified design envelope, the absence of specified mitigation, and significant gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These substantial deficiencies hinder a lawful and robust assessment of environmental effects, leaving the competent authority unable to determine the application based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application lacks a robust assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a well-structured and reasoned comparison of viable alternatives based on their environmental effects, it presents a narrative account of how the project evolved. This approach does not adequately show that less harmful options have been properly identified, evaluated, and preferred over more damaging solutions.

There is a significant absence of transparent, evidence-based comparisons concerning alternative offshore locations, development scales, or design configurations. Notably,

the proposal does not indicate that the developer has genuinely considered positioning the turbines further offshore, where the potential visual, ecological, and coastal impacts would likely be lessened. Given the sensitivity of the West Lewis coastline and the critical role of proximity to the shore in assessing impact, the failure to include this analysis undermines any assertion that the proposed siting is the least damaging option.

The shortcomings are also evident in the cable routing and landfall assessment, where there is inadequate evidence that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors. This includes significant areas of cultural and spiritual importance, such as Barvas Cemetery. The lack of a clear avoidance strategy, along with insufficient comparative analysis, suggests that mitigation through design has not been effectively applied, leading to an over-reliance 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 reflects a failure to adhere to the established mitigation hierarchy, preventing the competent authority from determining whether less harmful and more suitable alternatives are available. In the absence of a thorough alternatives assessment, it is impossible to conclude that the proposal represents a sustainable or policy-compliant solution.

From a policy standpoint, this deficiency compromises adherence to National Planning Framework 4, particularly concerning the protection of natural places, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment is a material omission that significantly contributes to the conclusion that the application has not been adequately evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The application submitted does not satisfy the necessary requirements of the Environmental Impact Assessment regime and the National Planning Framework 4 due to significant deficiencies in the assessment of marine ecology and protected species. This inadequacy stems from the failure to fully identify and assess the presence and behaviour of ecological receptors within the West Lewis coastal environment, a region known for its biological activity and sensitivity. The baseline data provided is incomplete, and the methodologies employed do not accurately reflect species presence, behaviour, and habitat use.

A particularly notable gap in the assessment is the treatment of otters, a species protected under European law. The application neglects to adequately acknowledge their active use of coastal areas for foraging and movement. Consequently, the evaluation fails to consider the core foraging range and behavioural patterns of otters, leading to an insufficient assessment of potential impacts from construction disturbance, noise, and increased activity. This oversight significantly undermines any conclusions drawn regarding the absence of significant effects on this species.

Additionally, the evaluation of basking sharks reveals further methodological shortcomings. The reliance on aerial surveys is problematic as it introduces a significant detection bias, particularly under Atlantic conditions. This approach is likely to underestimate the actual presence of basking sharks, especially when juxtaposed with land-based observations that indicate these waters are frequently used by the species. The failure to incorporate or adequately address such data culminates in an incomplete baseline that diminishes the reliability of the conclusions drawn.

Due to these methodological flaws, any conclusions suggesting negligible or non-significant effects rest on mere assumptions rather than on solid evidence. The lack of sufficient baseline data further impedes a meaningful assessment of cumulative and indirect impacts, including seasonal variations and interactions within the wider ecosystem. This scenario engenders uncertainty about the actual risks posed to marine species and habitats.

Considering these factors collectively, the presence of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These deficiencies obstruct a robust evaluation of impacts on marine ecology and protected species and confirm that the application lacks a sufficient evidential foundation. Thus, in light of the introduced uncertainties that prevent the exclusion of adverse effects beyond reasonable scientific doubt, consent cannot be lawfully granted.

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents significant shortcomings regarding the protection of biodiversity, failing to meet the evidential standards necessary to ascertain that no adverse effects will occur to protected sites. The presence of contradictions within the application undermines the assessment's reliability. Notably, while the developer asserts that no significant adverse effects will arise, this claim is juxtaposed with the advancement of a Habitats Regulations derogation case, which is only warranted when significant harm is anticipated. Such inconsistencies raise serious concerns about the validity of the conclusions drawn, indicating a lack of robust support from the underlying evidence.

The application overlooks the critical importance of key foraging areas and migratory pathways for seabird populations on the west coast of the Isle of Lewis, which are internationally recognised and currently face declining numbers. The assessment fails to adequately evaluate crucial factors such as displacement, collision risk, and habitat loss, particularly concerning seabirds tied to protected sites like the Lewis Peatlands and St Kilda. The reliance on modelling approaches raises uncertainties, especially for species experiencing severe declines, such as Kittiwakes and Fulmars. Additionally, the methodologies employed likely underestimate potential mortality rates, as they do not fully account for incomplete baseline data or the complexities of behavioural responses.

The siting of turbines within a recognised migratory corridor poses a further significant risk by creating a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor, as well as the potential impact on species with small global populations, have not been sufficiently addressed in the application.

From a regulatory standpoint, the evidence presented does not satisfy the necessary threshold to determine that protected sites' integrity will remain unaffected. The assessment's contradictory conclusions, along with data gaps and methodological limitations, indicate that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, thereby preventing a lawful conclusion that would support the granting of consent.

In summary, the ornithological assessment suffers from serious internal inconsistencies, methodological flaws, and a lack of substantial evidence, rendering it unreliable. Collectively, these deficiencies hinder an accurate evaluation of the impacts and indicate that the application does not fulfil the statutory requirements essential for determination, thereby conflicting with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment regarding cultural heritage and community identity is seriously lacking. It overlooks the West Lewis coastline as a vibrant cultural landscape where community, language, tradition, and environment are interconnected. The application reduces heritage to mere static assets and fails to recognise their ongoing social, cultural, and spiritual significance within the community.

Culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are mischaracterised. These sites serve as active places for burial and spiritual practice, yet they are treated as unchanging features. This oversight fails to take into account their continued use and the effects of development on their environment. As a result, the evaluation of cultural impacts is incomplete, neglecting their vital role in community life.

Moreover, the assessment does not address intangible cultural heritage. Key elements like the Gaelic language, traditions, and the community's enduring relationship with the coastal landscape are crucial to the area's identity but are notably absent from the assessment. This omission hinders a proper understanding of the development's cultural impact.

Concerns also arise regarding community rights and involvement. The Gaelic-speaking population has a unique cultural identity and is recognised as an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of engagement calls into question the validity of the assessment and ignores established principles of participation in matters affecting 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 absence of this assessment means that the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic effects on the island community. This alone renders the determination unlawful.

From a policy standpoint, these shortcomings put the proposal at odds with National Planning Framework 4, especially concerning the protection of historical assets and locations. Not considering both tangible and intangible heritage, and failing to acknowledge living cultural practices, represents a clear deviation from policy standards.

Overall, the lack of assessment regarding living heritage, intangible cultural value, community rights, and statutory requirements leads to a significant evidential gap. The cultural impacts of the proposed development have not been adequately evaluated, and the application does not offer a solid foundation for assessing the genuine 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 flaw that undermines the application's validity. The developer's commissioning of a Social Impact Assessment, which included focus groups with local residents, has not resulted in the publication of the full report. This omission creates a significant evidential gap, hindering both public understanding and the competent authority's ability to grasp the social risks identified through the developer's own research.

Residents are reportedly experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts, derived from direct community engagement, are not speculative in nature. However, without access to the complete assessment, the findings lack proper scrutiny, which limits the assessment of their significance in the decision-making process.

Moreover, the proposal has been perceived as a direct threat to community identity and cohesion, with indications of "cultural loss" noted in the developer's findings. Yet, these critical impacts have not been thoroughly integrated into the main application or given adequate consideration. The withholding of the complete Social Impact Assessment obscures the true human and social cost of the development.

This transparency issue also affects the Environmental Impact Assessment process. To fully understand the social, economic, and health impacts of a development of this scale, especially regarding community character and functioning, all data must be available. The absence of the complete dataset means that the application does not provide a thorough evidential basis for assessing the balance between potential benefits and harm.

From a policy standpoint, there is a failure to demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments are required to support positive health outcomes while avoiding harm; however, the available evidence suggests existing adverse effects that have not been disclosed. Without the full assessment, it cannot be confirmed that the application aligns with this policy.

The procedural implications of these shortcomings are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment, representing a material omission in the application that fails to satisfy the evidential requirements of the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, alongside evidence of existing adverse impacts, results in an incomplete and unreliable assessment. This situation hinders a lawful determination and further underscores that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual impacts associated with the proposed development is significantly inadequate, failing to recognise the extent of change and the sensitivity of the West Lewis coastline. This area is characterised by an open Atlantic horizon, an undeveloped landscape, and a profound sense of remoteness. The proposed installation of large-scale turbines near the shoreline would introduce an overwhelming industrial presence that would fundamentally change this character, leading to a permanent and irreversible alteration of the landscape.

The scale and positioning of the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This would detrimentally affect visual amenity and compromise the essential qualities of naturalness and remoteness. The current assessment does not accurately reflect the significance of these impacts or their relevance within such a sensitive landscape.

Methodological flaws also arise in the choice and presentation of visual viewpoints. It appears that the selected viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. Such shortcomings raise concerns that the true magnitude of visual impact has been understated, which undermines the credibility of the assessment.

Additionally, the assessment neglects to explore the interconnectedness of landscape, seascape, and cultural heritage. Important sites, including the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape network connected by visual and spatial relationships to the Atlantic horizon. By treating these sites as isolated elements, the assessment fails to consider their interdependence, leading to an incomplete understanding of how the proposed development would impact their setting and cultural significance.

The introduction of industrial elements into the seascape would disrupt these vital relationships, altering the context in which heritage assets are perceived and severing their link to the natural horizon. This constitutes not only a visual alteration but also a wider cultural and spatial detriment that has not been thoroughly evaluated in the application.

From a policy standpoint, the proposal is at odds with National Planning Framework 4, particularly in terms of protecting natural landscapes and historic assets. The magnitude of the proposed changes is incompatible with the need to preserve landscape character, visual amenity, and the context of culturally significant sites. The lack of a comprehensive worst-case scenario assessment further weakens any assertions of policy adherence.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelmingly dominant and unavoidable. Thus, the resultant changes are fundamentally permanent and cannot be reduced to an acceptable level through any proposed mitigation measures.

In summary, the assessment inadequately represents the scale of the impacts, the sensitivity of the environment, and the interrelated 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 a significant concern due to the incomplete assessment of construction and pollution risks, lacking the necessary detail to properly evaluate potential environmental effects. This development requires substantial 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, the application depends on mitigation and contingency measures that are intended to be formulated post-consent, thereby obstructing any meaningful evaluation of their adequacy or effectiveness.

This reliance on unspecified future measures raises alarm, particularly considering the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats that are at risk of disturbance and contamination from sediment. While the application acknowledges risks associated with sediment mobilisation and accidental chemical or oil spills, it fails to provide sufficient detail regarding the prevention, control, or monitoring of these incidents.

There is also a notable uncertainty surrounding 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 remains impossible to ascertain the extent, duration, or ecological implications of these impacts. This

uncertainty extends to the potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent is granted, the application obstructs the evaluation of whether adequate safeguards are in place for responding to pollution incidents. This introduces procedural risks and diminishes the competent authority's ability to assess environmental protection measures during the determination process.

From a regulatory standpoint, the deferral of essential environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. It is imperative that likely significant effects and appropriate mitigation are assessed prior to granting consent. The absence of such critical information renders a lawful determination impossible. Furthermore, the application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the deficiencies in defined mitigation measures, the lack of detailed management plans, and the uncertainties surrounding potential impacts render the assessment materially inadequate. These shortcomings obstruct a thorough evaluation of construction and pollution risks and reinforce the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment presented in the application is inadequate, particularly in its evaluation of fisheries and marine life, failing to provide a thorough examination of ecological and socio-economic impacts. The waters off the West Lewis coast are known for supporting a rich marine ecosystem and a significant fishing industry. However, the application does not adequately demonstrate that these vital uses and habitats can be preserved or sustained without considerable disruption.

A major concern is the assumption that fishing activity can be displaced without repercussions. The application lacks evidence to support claims that alternative fishing grounds are available, accessible, or capable of accommodating increased pressure. This gap is crucial, as such displacement could lead to overfishing in other areas, potentially resulting in broader economic consequences for the local fishing fleet. The absence of a clear, evidence-based assessment means the effects on fisheries and local livelihoods remain inadequately understood.

Moreover, the proposal poses substantial risks to marine species, particularly due to the underwater noise generated during construction. The extensive use of high-energy hammer piling is expected to cause disturbances across considerable distances, impacting species such as dolphins. The anticipated disturbance to a notable portion of the local bottlenose dolphin population raises serious concerns, yet the application diminishes the importance of these effects, lacking sufficient supporting evidence.

There is also a troubling inconsistency within the application, which acknowledges the requirement for licences to permit harm to European Protected Species while simultaneously asserting that impacts are negligible. This contradiction calls into question the credibility of the assessment and raises issues regarding compliance with the Habitats Regulations, especially where harm is expected to such an extent that it necessitates legal authorisation.

Additionally, the assessment fails to take into account cumulative impacts stemming from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these collective effects, it is impossible to determine the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not adequately show that the proposed development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity, which precludes any conclusion that this proposal represents sustainable development.

Collectively, the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions render the assessment incomplete and untrustworthy. These shortcomings hinder a comprehensive evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The evaluation of the onshore infrastructure is fundamentally lacking, as it does not fully address the impacts associated with what constitutes a single integrated project. The interconnection between the offshore turbines and the onshore components is crucial, yet they have been assessed in isolation, leading to a disjointed understanding of the environmental and socio-economic repercussions.

The onshore aspects encompass cabling that traverses protected moorland, the construction of a substation in proximity to Stornoway, and the necessary access infrastructure through delicate landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a vital carbon reservoir and ecologically important habitat. The current application fails to deliver a thorough assessment of these impacts, which hinders the comprehension of the project’s overall environmental implications.

By neglecting or postponing the evaluation of onshore effects, the application obstructs an accurate appraisal of cumulative impacts. The Environmental Impact Assessment process mandates that all elements of a project be considered collectively; however, the division of offshore and onshore components means that the combined effects on peatlands, habitats, and local communities remain inadequately examined.

There are substantial risks posed to sensitive environments, including machair systems and peatland areas that are safeguarded by policy. The application does not provide evidence that the impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented. This results in a significant gap regarding the protection of biodiversity.

Concerns also arise regarding the carbon balance associated with the proposal. Disturbance of peatland releases stored carbon, potentially leading to a carbon debt that undermines the aims of renewable energy initiatives. The application does not sufficiently tackle this matter or show that the overall carbon balance remains advantageous.

Moreover, the routing of infrastructure through operational croft land presents possible conflicts with established land use and legal rights. The application lacks evidence that the requisite consents or processes have been initiated, prompting doubts about its feasibility and lawful execution.

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

In summary, the fragmentation of project components, the absence of a comprehensive assessment, and the lack of proof concerning environmental and land use impacts render this part of the application inadequate and untrustworthy, ultimately obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The omission of an assessment regarding dark skies and nocturnal wildlife is a significant gap in the Environmental Impact Assessment, which has serious implications for the proposal. The West Lewis coastline is known for its exceptionally dark skies, which are integral to the area's environmental quality, cultural identity, and tourism appeal. The introduction of permanent red aviation lighting, which would be visible over long distances, would create a continuous and intrusive "wall of light" across the western horizon, fundamentally altering the night-time environment.

Moreover, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of residents and visitors. This is particularly troubling given the significance of dark skies to the identity of the region and the emergence of tourism sectors such as astro-tourism. The lack of consideration for these impacts indicates a clear deficiency in the overall landscape and environmental assessment.

More critically, there has been no evaluation of the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel

are particularly sensitive to artificial lighting due to phototaxis, which can result in disorientation and an increased risk of collision. The absence of a lighting impact assessment or a phototaxis study means that there has been no evaluation of how aviation lighting may affect these species or contribute to their mortality.

This lack of assessment is exacerbated by the use of daytime survey data in the ornithological evaluation, which fails to capture nocturnal activities or related risks. For instance, Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation caused by artificial lighting, yet this risk has gone unassessed. The failure to provide site-specific night-time data creates a critical deficiency in understanding the ecological impacts.

Without assessing the nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would suffer adverse effects. The necessary evidential standard to exclude potential adverse effects beyond reasonable scientific doubt is not met, thereby invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission contravenes National Planning Framework 4 concerning the safeguarding of natural places and environmental quality. It also detracts from the comprehensive evaluation of landscape and seascape impacts, as the night-time character is an essential aspect of the environment.

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

TOURISM

The application presents a materially deficient assessment of tourism impacts, neglecting to evaluate the economic and social ramifications for a key sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. Although the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide a quantified assessment regarding how large-scale offshore infrastructure could influence visitor numbers, behaviours, or overall economic contributions.

Tourism on the island has seen substantial growth, with revenues increasing from £65 million in 2017 to over £81.5 million. This sector supports more than 1,000 jobs and represents up to 16% of the island's economy. Despite this significance, the application does not evaluate how the industrialisation of the seascape and a potential decline in environmental quality might affect Tourism Gross Value Added or the broader economic resilience of the area. Without this analysis, it remains uncertain whether the proposed development would yield a net economic benefit or threaten a vital and expanding sector.

Furthermore, the assessment inadequately addresses the critical role of environmental quality in sustaining tourism, particularly the value of unspoiled landscapes and dark skies to visitor experience. The importance of emerging markets, such as nature-based tourism and astro-tourism, is overlooked, and the absence of a Dark Skies Assessment exacerbates this shortcoming, resulting in a lack of understanding regarding impacts on a recognised and growing component of the local economy.

The implications extend beyond tourism, affecting employment, local businesses, and community sustainability within an island community that already experiences limited economic diversification. The lack of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been thoroughly evaluated, as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application falls short of demonstrating compliance with the National Planning Framework 4, particularly concerning economic impacts and the necessity of showing net benefit. It contradicts strategic objectives that prioritise tourism as a growth sector, and fails to furnish adequate evidence for the competent authority to assess the economic consequences of the proposal.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the requirements for sustainable development when evaluated against statutory duties, national policy, and evidential standards. It mirrors the core issues that caused the rejection of the Lewis Wind Power proposal in 2008, which was deemed unacceptable in terms of the scale of industrialisation. This current application is presented under a policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet still falls short.

The application lacks a complete and reliable evidential basis for decision-making. There are significant gaps in baseline data, it utilises an undefined design envelope, and relies on unspecified mitigation measures. Furthermore, it fails to address key impact pathways, including nocturnal wildlife, comprehensive onshore infrastructure, and tourism impacts. As a result, the Environmental Impact Assessment is incomplete, inhibiting a full understanding of likely significant effects or residual impacts.

Procedural failures are evident as well. The lack of a compliant Island Communities Impact Assessment breaches statutory duties under the Islands (Scotland) Act 2018. Additionally, not disclosing the full Social Impact Assessment constitutes a material omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

This proposal contradicts the National Planning Framework 4. It 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 tourism impact modelling is absent. The cumulative impacts of offshore and onshore elements have not been properly assessed, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain unclear and may be significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The necessary evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been achieved. This engages the precautionary principle, preventing a lawful conclusion that the impacts are acceptable.

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 impacts on tourism represent permanent changes that cannot be effectively 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 should refuse consent on these grounds or invoke relevant regulatory provisions to require the submission of the missing information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 76CDE0C7

Member of the public 1054

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 relevant marine licensing and Environmental Impact Assessment regimes. A review of the Environmental Impact Assessment Report and its supporting documentation has revealed significant material deficiencies related to planning, environmental considerations, cultural aspects, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, an area recognised for its Atlantic-facing coastline, near-pristine environment, and robust cultural identity. The proposal's scale, design, and proximity to the shoreline raise serious concerns about its alignment with statutory requirements, national policy, and the principles of sustainable development.

Crucially, the application lacks an adequate evidential basis for a lawful determination. There is a notable absence of critical environmental data, with baseline information that is both limited and inconsistent. Furthermore, key elements of the proposal are not clearly defined. The application employs a flexible design framework that obscures the understanding of likely significant effects, and the reliance on unspecified mitigation measures renders it impossible to assess their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and the claims of negligible or non-significant effects lack robust supporting evidence.

There are evident and serious policy conflicts. The proposal appears to be at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not sufficiently demonstrate compliance with national requirements aimed at protecting biodiversity, climate considerations, and environmental integrity. These conflicts directly challenge the statutory tests needed for consent, undermining the ability of the competent authority to deem the development acceptable in policy terms.

Additionally, the unprecedented scale of the proposal in this location, with large turbines placed in close proximity to the shoreline, raises significant concerns regarding landscape capacity, visual dominance, and overall environmental impact. Collectively, the lack of sufficient information, the reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance illustrate that the application is incomplete and cannot support a lawful determination. Under these circumstances, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary completeness and transparency, failing to reliably detail the expected environmental effects of the proposal. The reliance on a flexible Project Design Envelope, which does not commit to precise turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This approach hampers the ability to apply a worst-case scenario consistently, thereby undermining the assessment's integrity. Consequently, the impacts outlined may not accurately reflect the final development, which hinders both public and competent authority understanding of the actual environmental effects.

The application is significantly dependent on undefined mitigation measures, monitoring strategies, and management plans, which remain unestablished at this stage. As consent is being sought based on the premise that environmental harm will be addressed later, this prevents any substantive evaluation of the effectiveness of these measures or a proper assessment of residual impacts. Such deferral of critical information to post-consent phases is procedurally inappropriate and conflicts with the fundamental aims of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly defined prior to determination.

Additionally, there are marked evidential shortcomings, including insufficient baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This creates uncertainty regarding the scale and significance of impacts, especially where negligible or non-significant effects are concluded without adequate supporting data. The lack of comprehensive information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainties that are incompatible with statutory requirements.

As a result, the application does not satisfy the evidential standards mandated under the Habitats Regulations, failing to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate adherence to the National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it has not been established that the impacts have been thoroughly assessed or that sufficient safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies preclude a lawful and rigorous assessment of environmental effects, placing the competent authority in a position where it cannot responsibly determine the application based on the information that has been presented.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is inadequate and fails to provide a comprehensive understanding of ecological receptors in the West Lewis coastal environment. This area is sensitive and biologically active, yet the baseline data is incomplete, and the methodologies used do not sufficiently capture the presence,

behaviour, and habitat use of species. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

One major oversight concerns otters, which are a European Protected Species. The application does not appropriately recognise or assess their active use of coastal regions for foraging and movement. The failure to consider their core foraging range and behavioural patterns means the possible impacts of construction disturbance, noise, and increased activity have not been adequately evaluated. This significantly weakens any conclusions drawn about the absence of significant effects on this species.

There are also serious shortcomings in the assessment of basking sharks. Relying on aerial surveys introduces a significant detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence, especially when compared to established land-based observations that indicate frequent use of these waters. The neglect to incorporate or properly consider such relevant data leads to an incomplete baseline and undermines the reliability of the conclusions presented.

These methodological flaws mean that the conclusions of negligible or non-significant effects are based more on assumptions than on robust evidence. The lack of sufficient baseline data also hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This results in uncertainty regarding the true extent of risk to marine species and habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents significant deficiencies, particularly regarding the evidential standards necessary to establish that there will be no adverse effects on protected sites. The reliance on contradictory conclusions within the assessment raises serious concerns about its reliability. The development site is situated within crucial foraging areas and migratory pathways for internationally important seabird populations that are already in decline. However, the application does not adequately assess the risks of displacement, collision, or habitat loss. Furthermore, the evidence provided does not convincingly demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected.

The methodologies employed appear to underestimate mortality rates due to incomplete baseline data and a lack of understanding of species-specific behavioural responses, particularly for vulnerable species like Kittiwakes and Fulmars. The presence of wind turbines within a recognised migratory corridor poses a significant risk by creating a barrier in a primary flight path used by birds migrating between the United Kingdom and Iceland. The assessment fails to thoroughly evaluate the long-term impacts of sustained mortality within this corridor and does not adequately address the consequences for species with small global populations.

From a regulatory standpoint, the application does not achieve the evidential threshold needed to conclude no adverse effect on the integrity of protected sites. The inconsistencies and data gaps present within the assessment violate the standards required to demonstrate beyond reasonable scientific doubt, engaging the precautionary principle, which ultimately undermines the possibility of a lawful conclusion in support of consent.

In addition, the failure to comply with the National Planning Framework 4 regarding biodiversity protection and the preservation of natural assets is evident. The inability to provide sufficient evidence that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy. Collectively, these shortcomings render the assessment unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidential support, leading to the conclusion that the application does not meet the necessary statutory requirements for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity is severely lacking, failing to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are fundamentally intertwined. The application adopts an overly simplistic stance, treating heritage as a collection of isolated, static assets and neglecting their ongoing social, cultural, and spiritual roles within the community.

There is a significant shortcoming in how culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas, are treated. These sites are active burial and spiritual locations, yet the assessment dismisses them as static features, overlooking their continued significance and the potential effects of development on their surroundings. This misrepresentation leads to an incomplete appraisal of cultural impacts and fails to account for their importance in community life.

The assessment also neglects intangible cultural heritage aspects, such as the Gaelic language, traditions, and the long-standing connection between the community and the coastal environment. These elements are essential to the identity of the area but are entirely omitted from consideration, creating a considerable gap in understanding the cultural implications of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population holds a distinct cultural identity recognised as characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent undertaken. This lack of meaningful engagement diminishes the validity of the assessment and does not adhere to established principles of participation in matters affecting cultural and environmental interests.

Furthermore, there is a critical failure regarding procedural compliance, specifically the lack of a necessary Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. Without this assessment, the relevant authority is unable to meet its legal obligations to evaluate the social, cultural, and economic repercussions on the island community. This deficiency alone renders a lawful determination impossible.

From a policy standpoint, these shortcomings directly contravene the National Planning Framework 4, especially concerning the protection of historical assets and places. The failure to account for both tangible and intangible heritage, as well as to acknowledge living cultural practices, represents a blatant deviation from policy mandates.

In summary, the neglect to evaluate living heritage, intangible cultural value, community rights, and statutory requirements results in a profound evidential gap. The cultural effects of the development have not been adequately assessed, and the application falls short of providing a solid foundation for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency in the assessment of social impacts, health, and wellbeing is concerning and significantly undermines the evaluation process. The developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the full report remains unpublished. This omission creates a notable evidential gap, hindering both public understanding and the competent authority's ability to gauge the full extent of the social risks that have been identified.

Available summaries suggest that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts stem from direct engagement and are therefore grounded in reality, not conjecture. The absence of the complete assessment limits scrutiny of these findings and restricts the ability to understand their implications for decision-making.

Furthermore, there are indications that the proposal poses a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer’s findings. Nonetheless, these significant impacts have not been adequately incorporated into the main application or given the appropriate consideration they deserve. The failure to disclose the full Social Impact Assessment obscures the true human and social costs

associated with the development.

This lack of comprehensive information also compromises the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health implications is vital for developments of this magnitude, particularly when community character and functionality are at stake. Without the complete dataset, the application lacks a full evidential basis necessary for assessing the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Developments are expected to promote positive health outcomes and mitigate harm, yet the existing evidence points to adverse effects that remain undisclosed. In light of the incomplete assessment, it is impossible to confirm compliance with this policy.

The procedural ramifications are considerable. The competent authority is unable to perform a thorough socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This represents a significant omission within the application and fails to meet the evidential standards required by the Environmental Impact Assessment regime.

Collectively, the non-disclosure of the full Social Impact Assessment, alongside evidence of existing adverse impacts, renders the assessment both incomplete and unreliable. This situation obstructs a lawful determination and reinforces the view that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal presents significant deficiencies in the assessment of seascape, landscape, and visual impacts, failing to adequately convey the extent of change or the sensitivity of the environment affected. The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. The proposed large-scale turbines, situated in close proximity to the shoreline, would introduce a continuous industrial presence, fundamentally transforming this character and leading to a permanent and irreversible alteration of the landscape.

Concerns arise regarding the methodology employed in selecting and presenting visual viewpoints. Evidence suggests that these viewpoints may not accurately reflect the most sensitive receptors or the worst-case scenarios, particularly concerning significant cultural heritage sites and high-value landscapes. This issue raises the possibility that the magnitude of the visual impact has been understated, casting doubt on the reliability of the assessment.

The application also inadequately addresses the interconnectedness of landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape context, linked by visual and spatial relationships to the Atlantic horizon. Rather than acknowledging this

interdependence, the assessment treats these assets as isolated, resulting in a limited evaluation of the impacts on their setting and cultural importance.

Moreover, the proposed industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are perceived and severing their connection to the natural horizon. This signifies not only a visual impact but a broader cultural and spatial detriment that remains insufficiently addressed in the application.

From a policy standpoint, the proposal conflicts with the National Planning Framework 4, particularly concerning the safeguarding of natural areas and historic assets. The magnitude of change proposed is inconsistent with the obligations to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further erodes any assertions 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 overwhelming and unavoidable. Consequently, the resulting changes are fundamental and permanent, rendering mitigation efforts unlikely to achieve an acceptable outcome.

Overall, the assessment does not accurately reflect the scale of the impact, the sensitivity of the environment, or the interconnected nature of landscape and heritage. These shortcomings hinder a dependable evaluation and strengthen the assertion that the proposal is inconsistent with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal presents significant risks to the sensitive West Lewis coastline, which is home to clean coastal waters and important habitats that are vulnerable to sediment disturbance and contamination. The assessment of construction and pollution risks is notably incomplete, lacking the necessary detail to evaluate potential environmental effects. The application does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans, instead depending on mitigation and contingency measures that are to be prepared after consent has been granted. This reliance on undefined future measures raises considerable concerns, especially given the delicate nature of the receiving environment.

The application acknowledges various risks, including sediment mobilisation and the potential for accidental chemical or oil spills. However, it fails to provide adequate information on the strategies that will be implemented to prevent, control, or monitor these risks. Furthermore, there is considerable uncertainty regarding the scale and behaviour of sediment plumes that may arise from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of such disturbances, which could adversely affect marine species and habitats that have already been identified as sensitive in the broader assessment.

The lack of detailed emergency response procedures only exacerbates these issues. By postponing contingency planning to a post-consent phase, the proposal undermines the ability to assess whether appropriate safeguards are in place for responding to pollution events. This creates procedural risks and hinders the competent authority's capacity to evaluate environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation need to be thoroughly assessed prior to consent; when such information is absent, a lawful determination cannot be reached. Additionally, the application does not demonstrate compliance with the policy requirements regarding environmental protection and water quality.

In summary, the combination of undefined mitigation measures, a lack of detailed management plans, and uncertainty about potential impacts results in an assessment that is materially deficient. These shortcomings prevent a thorough evaluation of construction and pollution risks, reinforcing the argument that the application is incomplete.

FISHERIES AND MARINE LIFE

The evaluation of the proposed development's impact on fisheries and marine life is severely lacking, leading to significant concerns about ecological and socio-economic consequences. The waters off the West Lewis coast are home to a rich marine ecosystem and a thriving fishing industry. However, the application does not adequately demonstrate how these vital resources can be safeguarded without causing major disruptions.

A critical flaw in the application is the assumption that fishing activities can simply be displaced without any repercussions. There is no evidence presented to suggest that alternative fishing grounds exist or that they could support the additional pressure created by such displacement. This gap is crucial, as it poses risks of overfishing in other areas and could have broader economic implications for the local fishing fleet. Without a detailed and evidence-based assessment, the effects on fisheries and the livelihoods they support remain inadequately understood.

The proposal also raises significant risks for marine species, particularly due to the underwater noise generated during the construction phase. Extended periods of high-energy hammer piling are expected to cause disturbances across extensive areas, adversely affecting species such as dolphins. The application downplays the potential impact on a significant proportion of the local bottlenose dolphin population, raising serious concerns, yet it lacks sufficient evidence to support these minimal assessments.

Moreover, there is an evident inconsistency within the application, as it acknowledges the necessity for licences to permit harm to European Protected Species while

simultaneously describing the anticipated impacts as negligible. This contradiction undermines the reliability of the assessment and raises questions about adherence to the Habitats Regulations, especially when harm is expected to the extent that it requires legal permission.

The assessment also neglects to account for cumulative impacts resulting from various pressures, such as habitat disruption, noise pollution, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, it remains impossible to ascertain the overall impact on marine ecosystems and the socio-economic landscape.

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

In conclusion, the absence of evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal contradictions found within the application collectively render the assessment incomplete and unreliable. These shortcomings obstruct a thorough evaluation of the effects on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The incomplete assessment of onshore infrastructure fails to account for the full range of impacts associated with this single integrated project. The intrinsic linkage between the offshore turbines and onshore works results in an assessment that is fragmented, thereby obscuring the true scale of environmental and socio-economic effects.

The elements related to onshore development encompass cabling traversing protected moorland, the construction of a substation in proximity to Stornoway, and the required access infrastructure through sensitive landscapes. Such works necessitate excavation in areas of deep peat, particularly within Barvas Moor, which is notable for being a significant carbon store and an ecologically sensitive habitat. The application lacks a comprehensive assessment of these impacts, which inhibits a thorough understanding of the overall environmental footprint of the project.

Furthermore, by omitting or postponing the evaluation of onshore impacts, the application obstructs a proper analysis of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project be examined collectively; however, the distinct treatment of offshore and onshore elements leads to an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

There are also considerable risks posed to sensitive habitats, including machair systems and peatland environments, which are subject to protective policies. The application does not substantiate that impacts on these habitats have been fully

assessed or that suitable avoidance measures have been implemented, leading to an evidential gap regarding biodiversity protection.

Additionally, concerns arise related to carbon balance, as the disturbance of peatland releases stored carbon and may create a carbon debt, which contradicts the objectives of renewable energy development. The application fails to adequately address this matter or to demonstrate that the overall carbon balance remains favourable.

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 processes have been commenced, raising questions about deliverability and lawful implementation.

From a policy standpoint, the failure to evaluate the project in its entirety and to demonstrate protection of peatlands, habitats, and land use interests is at odds with both the National Marine Plan and National Planning Framework 4. The inability to prove that impacts can be avoided or mitigated 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 section of the application incomplete and unreliable, ultimately hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal lacks a crucial assessment of dark skies and nocturnal wildlife, representing a significant omission within the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which play a vital role in environmental quality, cultural identity, and the tourism sector. The introduction of permanent red aviation lighting, which would be visible over long distances, would create a continuous and intrusive “wall of light” effect across the western horizon. This change would fundamentally alter the night-time environment.

The application fails to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of residents and visitors. This is particularly important as dark skies are integral to the area’s identity and to emerging sectors like astro-tourism. The omission results in a significant gap in the landscape and environmental assessment.

More importantly, there is no analysis of how the proposal would impact nocturnal wildlife. Birds such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are especially sensitive to artificial lighting, which can disorient them and increase the risk of collisions. The application does not incorporate any lighting impact assessment or phototaxis study, leading to a failure to determine how aviation lighting may affect these species or contribute to increased mortality rates.

The use of daytime survey data in the ornithological assessment further complicates

the situation, as it does not account for nocturnal activity or related risks. Species like Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation caused by artificial lighting; however, this risk has not been addressed. The lack of site-specific night-time data creates a significant gap in understanding the ecological impacts.

Without a proper evaluation of nocturnal effects, it becomes impossible to ascertain whether protected species or designated sites may be adversely impacted. The evidential standard necessary to rule out adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and hindering 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. They also weaken the overall assessment of landscape and seascape impacts, as the night-time character is an essential component of the environment.

In conclusion, the lack of any assessment concerning dark skies and nocturnal wildlife represents a major evidential gap. The absence of baseline data, impact modelling, and species-specific analysis makes the application incomplete and unable to support a lawful determination.

TOURISM

The application acknowledges that 86% of visitors to the Isle of Lewis are attracted by scenery, yet it fails to provide a quantified assessment of how large-scale offshore infrastructure may impact visitor numbers, behaviour, or the overall economic contribution from tourism. This sector relies heavily on the area’s wild coastline, near-pristine landscapes, dark skies, and sense of remoteness. Despite tourism's growth, from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and accounts for up to 16% of the island’s economy, the assessment neglects to model the potential effects of industrialisation on the seascape and loss of environmental quality on Tourism Gross Value Added and broader economic resilience.

Furthermore, the application does not consider the essential role of environmental quality in sustaining tourism. The importance of unspoiled landscapes and dark skies for visitor experiences is particularly relevant to emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this oversight, resulting in a significant gap in understanding the impacts on a key aspect of the local economy.

In a community with limited economic diversification, the inadequate assessment of tourism impacts carries broader implications for employment, local businesses, and community sustainability. The omission of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been adequately evaluated, which is a requirement under the Islands (Scotland) Act 2018.

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development when evaluated against statutory duties, national policy, and evidential standards. This application echoes the critical issues that prompted the refusal of the Lewis Wind Power proposal in 2008, wherein the scale of industrialisation was deemed unacceptable. Despite being presented within a more robust policy context, which prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application remains deficient.

A thorough evidential basis for determination is lacking. There are significant gaps in baseline data and an undefined design envelope, alongside an over-reliance on unspecified mitigation measures. Key impact pathways, such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects, are notably omitted. Consequently, the Environmental Impact Assessment is inadequate, failing to facilitate a complete understanding of the likely significant effects and residual impacts.

Procedural shortcomings are also evident. 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 a full Social Impact Assessment represents a material 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.

Moreover, the proposal is at odds with National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural habitats, and cultural heritage, fails to validate 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 components have not been sufficiently assessed, thereby obscuring the potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Incomplete assessments of marine ecology, seabirds, protected species, and marine mammals, in some instances, lack internal consistency. The evidential

threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, which engages the precautionary principle and inhibits a lawful conclusion regarding the acceptability of impacts.

Furthermore, the proposal is poised to cause 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 implications for tourism signify permanent effects that cannot be adequately mitigated.

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

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

Additional Comments

I formally object to this application as it contrevenes so many planning policies and guidelines. In order for a large multinational company to reap profits which will not help the islands in any way this application has given no consideration to:
Community engagement.
Cultural significance
Adverse impacts on protected birdie and habitats.
Onshore impacts and the statutory rights of crofters.
Irreparable harm to the tourist economy, upon which this island depends
Total community opposition.

This is most definitely a case of profits over people. And people in the Western Isles are once more treated as complete after thoughts and totally irrelevant. An absolute disgrace.

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Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: B3913CEC

Member of the public 1055

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 regulations. It arises from an evaluation of the Environmental Impact Assessment Report and the associated documentation, highlighting significant deficiencies across planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west coast of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and a strong sense of cultural identity. Concerns about the scale, proximity, and design of the project question its alignment with statutory requirements, national policies, and the tenets of sustainable development.

The application lacks an adequate evidential basis necessary for lawful determination. There are notable gaps in critical environmental data, with baseline information appearing limited and inconsistent, while key elements of the proposal remain unspecified. The adoption of a flexible design framework obscures the understanding of potential significant effects, and the reliance on unspecified mitigation measures hinders any assessment of their effectiveness. Consequently, the available documentation fails to provide a comprehensive or informed view of the environmental, cultural, or community impacts, rendering unsupported the claims of negligible or non-significant effects.

Additionally, there are substantial conflicts with established policies. The proposal shows inconsistencies 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 that national obligations to protect biodiversity, climate interests, and environmental integrity will be fulfilled. These discrepancies challenge the statutory tests for consent and impede the competent authority's ability to determine the project's acceptability in policy terms.

The unprecedented scale of the proposal, featuring large turbines situated near the shoreline, raises significant issues related to landscape capacity, visual impact, and environmental consequences. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear non-compliance with policy indicates that the application is incomplete and not capable of supporting a lawful determination. In light of these factors, it is imperative that the precautionary principle be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is significantly lacking and fails to provide a complete, transparent, or reliable account of the potential environmental effects associated with the proposal. The adoption of a flexible Project Design Envelope, without fixed commitments to specific turbine dimensions, layouts, or configurations, creates substantial uncertainty and hampers the ability to apply a worst-case scenario consistently. This situation undermines the integrity of the assessment, obscuring the true extent of environmental effects from both the public and the competent authority.

The application significantly depends on mitigation measures, monitoring strategies, and management plans that are yet to be defined. Consequently, consent is sought on the premise that environmental harm will be mitigated at a later stage, which obstructs any meaningful evaluation of effectiveness or assessment of residual impacts. This postponement of critical information to post-consent phases is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be established clearly prior to determination.

Furthermore, there are notable evidential shortcomings, including insufficient baseline data, methodological limitations, and an over-reliance on assumptions in lieu of site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are made without robust supporting data. The lack of sufficient information inhibits a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot align with statutory requirements.

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 raises concerns regarding the precautionary principle, particularly regarding protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, including stipulations concerning biodiversity protection and environmental integrity, as it cannot be established that impacts have been thoroughly assessed or that appropriate safeguards are in place.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed application exhibits a fundamental inadequacy in its assessment of cultural heritage and community identity, failing to recognise the West Lewis coastline as a living cultural landscape where the environment, language, tradition, and community are intrinsically linked. The approach taken is reductive, treating heritage as

isolated and static assets rather than acknowledging their ongoing social, cultural, and spiritual roles within the community.

A notable deficiency is evident in the treatment of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas. These sites are active places of burial and spiritual practice; however, the assessment categorises them merely as static features. This mischaracterisation neglects their continued use and the impact of development on their setting, leading to an incomplete evaluation of cultural effects and disregarding their importance within community life.

Moreover, the application does not assess intangible cultural heritage, such as the Gaelic language, traditions, and the long-standing relationship between the community and the coastal environment. These elements are central to the area's identity, yet they are entirely absent from the assessment, signifying a major oversight. The lack of consideration for these factors obstructs a proper understanding of the cultural impact of the development.

Concerns also arise regarding community rights and engagement, particularly as the Gaelic-speaking population embodies a distinct cultural identity with characteristics of an Indigenous People. The absence of a process of Free, Prior and Informed Consent undermines the legitimacy of the assessment and fails to adhere to established principles of participation in decisions that affect cultural and environmental interests.

A critical procedural failure is the lack of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. Without this essential assessment, the competent authority is unable to fulfil its legal duty to evaluate the social, cultural, and economic impacts on the island community, rendering a lawful determination unattainable.

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

Overall, the collective failures to assess living heritage, intangible cultural value, community rights, and statutory obligations result in a significant evidential gap. The cultural impacts of the development have not been adequately assessed, and the application does not provide a sufficient foundation for evaluating the true cultural cost of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The 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.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the application does not adequately address the ecological or socio-economic impacts of the proposed development. It lacks a robust evaluation and fails to demonstrate how these vital habitats and

activities can be protected or maintained without significant disruption.

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

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

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

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

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

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

SUMMARY

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

wellbeing, the proposal still fails to address these concerns adequately.

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

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

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

Environmental risks associated with the proposal are uncertain and potentially significant. Evaluations of marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in parts. The evidential threshold required to demonstrate the absence of adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful conclusion regarding acceptable impacts.

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

In summary, the application is procedurally and substantively unfit for determination. The extensive information deficiencies, combined with conflicts with policy and unresolved environmental risks, inhibit a lawful, evidence-based decision. The competent authority should refuse consent for the Spiorad na Mara Offshore Wind Farm application in its entirety.

Additional Comments

I highly object to this. Not only will it destroy my view, it will negatively impact on my family’s fishing business.
My husband works in offshore energy and is well aware that these turbines are not

sustainable. They have a very short life span and often are not repairs- the damage they create. Should this go ahead, why could it not go ahead further out to sea instead of right on our doorsteps?!

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 14970962

Member of the public 1056

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 for consideration under the marine licensing and Environmental Impact Assessment regulations. The objection is grounded in a thorough examination of the Environmental Impact Assessment Report and its supporting documents, highlighting deficiencies related to planning, environmental issues, cultural significance, and procedural integrity. Located off the west coast of the Isle of Lewis, the area is characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The scale, proximity, and design of the wind farm raise serious questions about its alignment with statutory requirements, national policy, and the principles of sustainable development.

A critical analysis reveals that the application lacks a sufficient evidential basis for a lawful determination. There is a notable absence of key environmental data, while the baseline information provided is both limited and inconsistent. Moreover, many aspects of the proposal remain unclear. The flexible design framework employed hinders a comprehensive understanding of potential significant effects, and the reliance on unspecified mitigation measures means their effectiveness remains unassessed. Consequently, the documentation fails to facilitate a complete or informed understanding of the environmental, cultural, or community impacts, and assertions regarding negligible or non-significant effects are not substantiated by robust evidence.

Furthermore, there are significant conflicts with established policies. The proposal seems to contradict the National Marine Plan, the Environmental Impact Assessment regulations, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not convincingly demonstrate adherence to national requirements for the protection of biodiversity, climate interests, and environmental integrity. Such conflicts directly affect the statutory tests necessary for consent and impede the competent authority's ability to determine the acceptability of the development from a policy perspective.

The scale of this proposal is unprecedented in the region, with large turbines planned in close proximity to the shoreline, raising substantial concerns about landscape capacity, visual impact, and broader environmental consequences. The collective effect of insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance suggests that the application is incomplete and unfit to support a lawful determination. Under these circumstances, it is essential that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a comprehensive and transparent analysis of the potential environmental consequences of the proposal. The introduction of a flexible Project Design Envelope, lacking fixed turbine dimensions, layouts, or configurations, creates considerable uncertainty. This variability hinders the ability to apply a worst-case scenario consistently, compromising the reliability of the assessment and obscuring the true environmental impacts. Consequently, both the public and the competent authority are left without a clear understanding of the actual effects of the development.

Moreover, the application places considerable reliance on yet-to-be-defined mitigation measures, monitoring strategies, and management plans. Seeking consent on the premise that environmental harm will be mitigated in the future undermines any meaningful evaluation of the proposed measures' effectiveness and the assessment of residual impacts. This postponement of essential information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation strategies be clearly outlined before any decision is made.

The assessment is also marred by significant evidential shortcomings, including gaps in baseline data and methodological limitations. The reliance on assumptions rather than site-specific evidence introduces uncertainty regarding the magnitude and importance of the impacts. This is particularly concerning when conclusions of negligible or non-significant effects are presented without sufficient data to support them. The lack of adequate information hinders a comprehensive understanding of cumulative and worst-case impacts, resulting in scientific uncertainty that does not align with statutory obligations.

Consequently, the application fails to meet the evidential criteria set forth in the Habitats Regulations, which necessitate excluding adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, specifically with respect to biodiversity protection and environmental integrity, as it cannot substantiate that all impacts have been thoroughly assessed or that appropriate protective measures are in place.

In summary, the combination of an undefined design envelope, the lack of specified mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings obstruct a lawful and thorough evaluation of environmental impacts, leaving the competent authority unable to make an informed decision based on the provided information.

ASSESSMENT OF ALTERNATIVES

The proposed application does not provide an adequate assessment of alternatives, failing to meet the requirements set by the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of viable alternatives based

on their environmental impacts, it presents a narrative that describes the project's development. This method does not show that less harmful options have been properly identified, assessed, and chosen over more damaging solutions.

There is a lack of transparency and evidence in the comparison of alternative offshore locations, development scales, or design configurations. Specifically, the application does not indicate that the developer has seriously considered placing turbines further offshore, which could reduce visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline and the crucial role of proximity to shore in assessing impact, the lack of such analysis means it cannot be concluded that the proposed siting is the least damaging option.

These shortcomings also apply to the assessment of cable routing and landfall, where there is insufficient evidence of proper exploration of alternative routes to avoid or minimise impacts on sensitive receptors. This includes important areas like Barvas Cemetery, which have cultural and spiritual significance. The absence of a clear strategy to avoid impacts and the lack of comparative analysis suggest that mitigation by design has not been applied, with reliance instead on post-design mitigation measures.

Consequently, the application does not show that environmental harm has been minimised through choices related to site selection, layout, and infrastructure routing. This indicates a failure to adhere to the established mitigation hierarchy and prevents 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.

From a policy standpoint, this deficiency undermines adherence to National Planning Framework 4, especially regarding the protection of natural spaces, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission that leads to the conclusion that the application has not been adequately evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

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

One major oversight concerns otters, which are a European Protected Species. The application does not appropriately recognise or assess their active use of coastal regions for foraging and movement. The failure to consider their core foraging range and behavioural patterns means the possible impacts of construction disturbance, noise, and increased activity have not been adequately evaluated. This significantly weakens

any conclusions drawn about the absence of significant effects on this species.

There are also serious shortcomings in the assessment of basking sharks. Relying on aerial surveys introduces a significant detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence, especially when compared to established land-based observations that indicate frequent use of these waters. The neglect to incorporate or properly consider such relevant data leads to an incomplete baseline and undermines the reliability of the conclusions presented.

These methodological flaws mean that the conclusions of negligible or non-significant effects are based more on assumptions than on robust evidence. The lack of sufficient baseline data also hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This results in uncertainty regarding the true extent of risk to marine species and habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, presenting significant gaps in evidence and internal inconsistencies that compromise its conclusions. The presence of internationally important seabird populations on the west coast of the Isle of Lewis, many of which are already experiencing decline, raises serious concerns. Despite this, the application does not adequately demonstrate that these species will not suffer adverse effects. Key foraging areas and migratory pathways are directly impacted by the development, yet the assessment fails to thoroughly evaluate the potential risks of displacement, collision, and habitat loss.

A notable contradiction arises within the application itself, as the developer asserts that there will be no significant adverse effects while also advancing a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This contradiction undermines the credibility of the assessment and suggests that the conclusions drawn are not substantiated by the evidence provided. Furthermore, the assessment does not convincingly show that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these vital feeding grounds is not adequately considered, and the reliance on modelling

approaches introduces a degree of uncertainty, particularly concerning severely declining species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, especially in instances where baseline data is lacking and the behavioural responses of the species are not fully understood.

Moreover, the placement of turbines within a designated migratory corridor significantly heightens the risk to avian populations, effectively creating a barrier along a primary flight path that species use while migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term repercussions of sustained mortality in this corridor, nor does it consider the implications for species with relatively small global populations.

From a regulatory standpoint, the application falls short of the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory findings, alongside data gaps and limitations in modelling, indicates that the standard of proof beyond reasonable scientific doubt has not been met. This invokes the precautionary principle, thereby hindering a lawful conclusion in favour of consent. Additionally, the identified deficiencies reflect a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally significant seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

In summary, the assessment lacks reliability due to its internal inconsistencies, methodological shortcomings, and inadequate evidence. These issues preclude a comprehensive evaluation of impacts and support the overall conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment fails to recognise the West Lewis coastline as a living cultural landscape, where the connections between environment, language, tradition, and community are integral. It adopts a reductive perspective, viewing heritage merely as isolated and static entities, rather than acknowledging their continuous social, cultural, and spiritual significance within the community.

A notable shortcoming is evident in the treatment of culturally significant sites, specifically the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice; however, the assessment mischaracterises them as static features, neglecting their ongoing use, meaning, and the implications of development on their context. This oversight leads to an incomplete understanding of the cultural ramifications and disregards their importance to community life.

Moreover, the assessment does not address intangible cultural heritage elements, such as the Gaelic language and traditions, nor does it acknowledge the longstanding relationship between the community and the coastal environment. These factors are vital to the area’s identity but are completely omitted from the evaluation, representing

a considerable lapse. The cultural impact of the development cannot be adequately comprehended without these considerations.

There are additional concerns regarding community rights and engagement. The Gaelic-speaking population, characterised as an Indigenous People, has a unique cultural identity, 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 of participation in matters affecting cultural and environmental interests.

Furthermore, the absence of a compliant Island Communities Impact Assessment is a critical procedural failure. This assessment is a statutory requirement under the Islands (Scotland) Act 2018. Its absence means that the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic effects on the island community, which alone obstructs lawful determination.

From a policy standpoint, these deficiencies place the proposal at odds with National Planning Framework 4, particularly regarding the preservation of historic assets and sites. The neglect of both tangible and intangible heritage, along with the failure to recognise living cultural practices, clearly deviates from policy stipulations.

Ultimately, the collective failure to evaluate living heritage, intangible cultural value, community rights, and statutory obligations culminates in a significant evidential gap. The cultural effects of the development have not been sufficiently assessed, and the application lacks an adequate foundation for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's Social Impact Assessment has raised significant concerns, as it lacks the necessary transparency for a lawful evaluation. While the developer engaged with local residents through focus groups, the full report has not been published. This gap in available information hinders both the public and the competent authority from grasping the full extent of the social risks identified in the developer’s own research.

Residents are reportedly experiencing tangible stress, anxiety, and concern linked to the scale and proximity of the proposed development. These impacts stem from direct engagement with the community and are not merely speculative. However, the failure to disclose the complete assessment restricts proper scrutiny of the findings, limiting the ability to assess their significance in the decision-making process.

Moreover, there is a prevailing perception that the proposal threatens community identity and cohesion, with “cultural loss” identified within the developer’s findings. Nonetheless, these impacts have not been adequately integrated into the main application or given the necessary attention. The lack of a full Social Impact Assessment obscures the genuine human and social costs associated with the development.

The absence of transparency undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning are at stake. Without the complete dataset, the application lacks a robust evidential basis to assess the balance between benefits and harms.

From a policy perspective, there is a failure to demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments are expected to promote positive health outcomes and avoid harm, yet available evidence suggests adverse effects that remain undisclosed. Without the complete assessment, the application cannot prove compliance with this policy.

The procedural implications of this situation are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This omission represents a material deficiency in the application and fails to meet the evidential standards required by the Environmental Impact Assessment regime.

Collectively, the non-disclosure of the complete Social Impact Assessment, alongside evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This compromises the capacity for a lawful determination and reinforces the view that the application is not backed by adequate information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of seascape, landscape, and visual impacts is significantly inadequate, failing to accurately portray the degree of change and the sensitivity of the environment. The West Lewis coastline is characterised by an open Atlantic horizon, an undeveloped nature, and a strong sense of remoteness. The addition of large-scale turbines in close proximity to the shore would create a persistent industrial presence, fundamentally changing this character and leading to an irreversible transformation of the landscape.

Moreover, the application does not sufficiently depict the extent of this visual change. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and frequently visited coastal locations, directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment does not accurately reflect the significance of this impact within the context of such a sensitive landscape.

Concerns are also present regarding the methodology used for selecting and presenting visual viewpoints. Evidence indicates that these viewpoints may not comprehensively represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the magnitude of visual impact is understated, casting doubt on the reliability of the assessment.

Additionally, there is a notable failure to evaluate 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 connected by visual and spatial relationships to the Atlantic horizon. The assessment treats these as isolated assets without acknowledging their interdependence, which results in an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, modifying the context in which heritage assets are perceived and severing their connection to the natural horizon. This signifies not just a visual impact, but also a wider cultural and spatial damage that has not been properly evaluated within the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, particularly regarding the protection of natural spaces and historic assets. The scale of change is incompatible 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 undermines any assertion of compliance with policy.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and inescapable. 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 portray the scale of impact, the sensitivity of the environment, and the interconnected nature 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 proposal presents significant concerns regarding the completeness of its assessment related to construction and pollution risks, which lacks the necessary detail to evaluate potential environmental effects. Given the substantial seabed preparation and installation works proposed in a high-energy Atlantic environment, there is a notable absence of fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application indicates that mitigation and contingency measures will be formulated after consent, which obstructs any meaningful assessment of their potential adequacy or effectiveness.

This reliance on unspecified future measures raises alarm, particularly when considering 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 does acknowledge risks like sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on preventive, control, or monitoring strategies.

Moreover, uncertainty persists 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 hampers the ability to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also extends to the potential effects on marine species and habitats already recognised as sensitive in the broader assessment.

The shortcomings in the application are further exacerbated by the absence of detailed emergency response procedures. By postponing contingency planning to a post-consent stage, the application inhibits the evaluation of whether sufficient safeguards are in place to manage pollution events. This introduces procedural risks and undermines the capability of the competent authority to assess environmental protection measures adequately at the determination stage.

From a regulatory standpoint, the deferral of essential environmental safeguards is at odds with the obligations set out in the Environmental Impact Assessment regime. Significant likely effects and necessary mitigation must be evaluated prior to consent, and the absence of such information means that a lawful determination cannot be achieved. Furthermore, the application does not sufficiently demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of clearly defined mitigation measures, detailed management plans, and uncertainty regarding potential impacts create a materially deficient assessment. These deficiencies hinder a comprehensive evaluation of construction and pollution risks, reinforcing the argument that the application is incomplete.

FISHERIES AND MARINE LIFE

The application concerning the development off the West Lewis coast reveals significant deficiencies in its assessment of fisheries and marine life, which undermines its reliability. The ecological evaluation does not adequately address the diverse marine ecosystem present in these waters, nor does it consider the active fishing industry. The failure to demonstrate how these vital uses and habitats can be protected or maintained without substantial disruption is concerning.

A notable flaw in the proposal is the assumption that fishing activities can be displaced without adverse effects. There is a lack of evidence supporting the availability, accessibility, or capacity of alternative fishing grounds to accommodate increased pressure. This absence of information is critical, as the potential for overfishing in different areas could have broader economic implications for the local fishing fleet. Without a solid, evidence-based assessment, the repercussions on fisheries and local livelihoods remain unclear.

Moreover, the proposal poses significant risks to marine species, particularly due to the underwater noise produced during construction. The anticipated high-energy hammer piling over a prolonged period is expected to disturb a wide area, affecting species like dolphins. The predicted impact on a substantial portion of the local bottlenose dolphin

population is alarming, yet the application appears to minimise these concerns without adequate supporting evidence.

The assessment contains an evident contradiction; while it acknowledges the necessity for licences to permit harm to European Protected Species, it simultaneously categorises the impacts as negligible. This inconsistency undermines the credibility of the evaluation and raises questions about adherence to the Habitats Regulations, particularly when anticipated harm necessitates legal authorisation.

Additionally, the assessment neglects to consider cumulative impacts from various pressures such as habitat disturbance, noise, and displacement of fishing activities. A thorough evaluation of these combined effects is essential to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate compliance with the National Planning Framework 4 or the National Marine Plan. It does not sufficiently show that the development can coexist with existing marine users or avoid unacceptable consequences for marine biodiversity, making it impossible to conclude that the proposal aligns with sustainable development principles.

In summary, the deficiencies regarding evidence on fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies render the assessment incomplete and untrustworthy. These shortcomings prevent an accurate evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed project encompasses both offshore turbines and onshore infrastructure, yet the assessment of onshore elements is significantly incomplete. This fragmentation results in a failure to understand the full range of environmental and socio-economic impacts associated with what is fundamentally a single integrated project. Onshore works include the installation of cabling across protected moorland and the construction of a substation near Stornoway, alongside associated access infrastructure that traverses sensitive landscapes.

Critical to this proposal is the excavation that will occur across areas of deep peat, particularly within Barvas Moor, a vital carbon store and ecologically sensitive habitat. The application does not adequately assess these impacts, thus preventing a thorough understanding of the overall environmental footprint of the project. The separate evaluations of offshore and onshore components mean that cumulative effects on peatlands, habitats, and local communities remain inadequately addressed.

Furthermore, significant risks to sensitive habitats exist, including machair systems and peatland environments, both of which are subject to specific policy protections. The application lacks demonstration of a full assessment of impacts on these habitats or the implementation of appropriate avoidance measures, resulting in a notable evidential gap in biodiversity protection.

The proposal also presents concerns surrounding carbon balance. Disturbance of peatland can release stored carbon, leading to a potential carbon debt that contradicts the goals of renewable energy development. The application fails to sufficiently address this critical issue or to show that the overall carbon balance will be maintained as beneficial.

Additionally, routing infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. There is no evidence presented that demonstrates the initiation of necessary consents or processes, which raises doubts regarding the deliverability and lawful execution of the project.

From a policy standpoint, the inability to assess the project as a cohesive whole and to show adequate protection of peatlands, habitats, and land use interests stands in conflict with the National Marine Plan and National Planning Framework 4. The lack of ability to demonstrate that impacts can be avoided or mitigated further undermines the validity of the application.

Overall, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts culminate in an application that is incomplete and unreliable, hindering lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife represents a serious gap within the Environmental Impact Assessment. The West Lewis coastline boasts exceptionally dark skies, which are vital not only to environmental quality but also to cultural identity and tourism. The proposed introduction of permanent red aviation lighting, which would be visible over extensive distances, threatens to create a continuous and intrusive “wall of light” effect across the western horizon, fundamentally changing the night-time landscape.

Moreover, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This lack of consideration is particularly concerning given the significance of dark skies to the area's identity and the growth of tourism sectors, including astro-tourism. The neglect to assess these impacts leads to a notable deficiency in the overall environmental and landscape evaluation.

Equally alarming is the lack of analysis regarding the effects on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel exhibit high sensitivity to artificial lighting, which can result in disorientation and heightened risks of collision. The application does not feature any lighting impact assessment or phototaxis study, and as such, it neglects to consider how the proposed aviation lighting could impact these species or contribute to increased mortality rates.

This shortcoming is further exacerbated by the dependence on daytime survey data in the ornithological assessment, which fails to capture nocturnal behaviours or the associated hazards. Kittiwakes, for example, may forage or migrate at night and are likewise susceptible to disorientation from artificial lighting, a risk that has not been adequately evaluated. The lack of site-specific night-time data prevents a comprehensive understanding of the potential ecological impacts.

Without a thorough assessment of nocturnal effects, it remains impossible to ascertain whether protected species or designated sites might face adverse impacts. The necessary evidential standard to rule out negative effects beyond reasonable scientific doubt cannot be fulfilled, invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission contravenes National Planning Framework 4, which pertains to the safeguarding of natural places and environmental quality. It also diminishes the broader evaluation of landscape and seascape effects, as the character of the night forms an essential component of the environment.

In summary, the lack of any assessment concerning dark skies and nocturnal wildlife constitutes a significant evidential shortfall. The absence of baseline data, impact modelling, and species-specific analysis leaves the application incomplete and unsuitable for supporting a lawful determination.

TOURISM

The Isle of Lewis tourism sector, which has seen growth from £65 million in 2017 to over £81.5 million, is critical to the local economy, supporting more than 1,000 jobs and representing up to 16% of the island's economy. The application under review does not adequately assess the economic and social impacts that could arise from large-scale offshore infrastructure development, which could threaten this vital sector. Despite recognising that 86% of visitors are attracted by the area's stunning scenery, the assessment does not quantify how this proposed industrialisation would affect visitor numbers, their behaviour, or the overall economic contribution of tourism.

Additionally, the assessment neglects to evaluate how the environmental quality crucial to tourism, such as unspoiled landscapes and dark skies, may be compromised. This oversight is particularly concerning given the importance of these factors for the growing fields of nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment further highlights the deficiencies in the evaluation, leaving a notable gap in understanding the potential impacts on a vital part of the local economy.

In an island community with limited economic diversification, the lack of consideration for tourism impacts carries broader implications for employment, local businesses, and the sustainability of communities. Furthermore, the failure to conduct an Island Communities Impact Assessment as mandated by the Islands (Scotland) Act 2018 means that these economic vulnerabilities have not been appropriately evaluated.

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

Overall, the lack of quantification of tourism impacts, the failure to evaluate environmental factors influencing visitor behaviour, and the disregard for the island's economic dependence create a substantial evidential gap. This gap undermines any robust evaluation of the economic effects and reinforces the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal represents a significant failure to meet the criteria for sustainable development as defined by statutory obligations, national policy, and evidential standards. This application mirrors the fundamental issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. It is now presented under a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are critical gaps in the evidential basis provided for this application, including incomplete baseline data, reliance on an undefined design envelope, unspecified mitigation measures, and the absence of key impact pathways such as effects on nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is inadequate, failing to offer a comprehensive understanding of the likely significant effects or residual impacts.

Moreover, the application exhibits clear procedural shortcomings. The lack of a compliant Island Communities Impact Assessment breaches statutory duties under the Islands (Scotland) Act 2018, while the failure to disclose the complete Social Impact Assessment constitutes 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.

In addition, the proposal is at odds with National Planning Framework 4. It does not adequately protect biodiversity, natural places, and cultural heritage, fails to demonstrate acceptable health and wellbeing impacts, and cannot substantiate a net economic benefit due to the absence of tourism impact modelling. The cumulative effects of offshore and onshore components have not been properly assessed, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks are uncertain and potentially significant. The assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in parts. The evidential threshold required to affirm the absence of

adverse effects beyond reasonable scientific doubt has not been fulfilled, necessitating the application of the precautionary principle and preventing any lawful conclusion that impacts can be deemed 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, the disruption of cultural and visual relationships, and negative effects on tourism signify permanent impacts that cannot be adequately mitigated.

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

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 5A8B6AB2

Member of the public 1057

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. The proposal has been reviewed in light of the Environmental Impact Assessment Report and associated documents, revealing several material deficiencies in planning, environmental, cultural, and procedural aspects. The development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline and strong cultural identity. Concerns regarding compatibility with statutory requirements and national policy arise from the scale, proximity, and design of the project, challenging the principles of sustainable development.

The application does not provide a sufficient evidential basis for a lawful determination. Essential environmental data is absent, baseline information is limited and inconsistent, and several key elements of the proposal remain undefined. The flexible design framework used obscures a clear understanding of the likely significant effects, and the reliance on unspecified mitigation measures prevents an assessment of their effectiveness. Consequently, the documentation fails to offer a comprehensive understanding of environmental, cultural, or community impacts, while claims of negligible or non-significant effects lack robust evidence.

There are notable policy conflicts present. The proposal appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, cultural heritage, and health and wellbeing. It does not sufficiently demonstrate that national requirements aimed at protecting biodiversity, climate interests, and environmental integrity will be fulfilled. These conflicts relate directly to the statutory tests necessary for consent and hinder the competent authority's ability to determine the proposal's acceptability in policy terms.

The unprecedented scale of the proposal in this area, featuring large turbines placed near the shoreline, raises substantial concerns about landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. In light of these issues, 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.

ASSESSMENT OF ALTERNATIVES

The proposal fails to meet the statutory requirements of the Environmental Impact Assessment regime, as the assessment of alternatives is materially inadequate. Instead of offering a structured comparison of realistic alternatives based on their environmental effects, the application merely presents a narrative account of how the project has evolved. This methodology does not sufficiently demonstrate that less

harmful options have been identified, assessed, and selected over more damaging solutions.

There is a clear lack of a transparent, evidence-based comparison of alternative offshore locations, development scales, or design configurations. Notably, the application does not indicate that the developer has seriously considered placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be lessened. The West Lewis coastline is sensitive, and proximity to the shore is critical in assessing impact; without this analysis, one cannot conclude that the proposed siting is the least damaging available option.

These shortcomings also extend to the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The lack of a clear strategy to avoid these impacts and the absence of comparative analysis suggest that mitigation by design has not been considered, relying instead on post-design measures for mitigation.

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

From a policy standpoint, this deficiency jeopardises compliance with National Planning Framework 4, particularly regarding the protection of natural places, cultural heritage, and community wellbeing. The omission of a structured and comparative assessment is significant and contributes to the overall conclusion that the application has not undergone adequate assessment, rendering it incapable of supporting a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The application presents a serious shortcoming in its assessment of marine ecology and protected species within the West Lewis coastal environment. This area is a highly sensitive and biologically active marine system; however, the baseline data provided is incomplete, and the methodologies used fail to adequately capture the presence, behaviour, and habitat use of species. Consequently, the assessment does not offer a reliable evidential basis for evaluating potential impacts.

A critical gap in the assessment pertains to otters, which are recognised as a European Protected Species. The application does not sufficiently acknowledge or assess their active use of coastal areas for foraging and movement. Due to the oversight of their core foraging range and behavioural patterns, the assessment does not adequately evaluate the potential effects of construction disturbance, noise, and increased activity, thereby undermining conclusions related to the absence of significant effects

on this species.

Further issues are evident in the assessment of basking sharks. The reliance on aerial surveys results in significant detection bias, particularly in the challenging Atlantic conditions. This method is likely to underestimate the presence of basking sharks, especially in light of established land-based observations indicating their frequent use of these waters. The failure to incorporate or appropriately consider such data leads to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological flaws lead to conclusions of negligible or non-significant effects that are based more on assumptions than on robust evidence. The lack of adequate baseline data further hampers any meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty regarding the actual scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as the assessment of protected species is insufficient. The uncertainty introduced prevents the clear exclusion of adverse effects beyond reasonable scientific doubt, necessitating the invocation of the precautionary principle. Under these conditions, it is not lawful to grant consent.

Overall, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These deficiencies hinder a thorough evaluation of impacts on marine ecology and protected species, ultimately leading to the conclusion that the application lacks a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application is fundamentally unreliable, presenting significant internal inconsistencies and substantial gaps in evidence that undermine its findings. Key foraging areas and migratory pathways, essential for the internationally important seabird populations along the west coast of the Isle of Lewis, are not adequately protected. The application fails to demonstrate, with the required evidential standard, that these species will remain unaffected. Moreover, the siting of turbines within a recognised migratory corridor creates considerable risks, as it potentially acts as a barrier for species migrating between the United Kingdom and Iceland.

A glaring contradiction exists, wherein the developer claims there are no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment and raises concerns that its conclusions are unsupported by the evidence. The methodologies used in the assessment appear to underestimate potential mortality, particularly given that baseline data is lacking and behavioural responses of the species are not well

understood.

Furthermore, the assessment does not sufficiently consider the seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, or fully account for the importance of their feeding grounds. The reliance on modelling approaches adds a layer of uncertainty, especially for species already experiencing severe declines, such as Kittiwakes and Fulmars.

From a regulatory viewpoint, the application does not meet the evidential threshold required to establish no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, combined with data gaps and limitations in modelling, means that the requisite standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and inhibits a lawful conclusion in support of consent.

In addition, the identified deficiencies constitute 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 in direct conflict with national policy. Collectively, these factors lead to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage associated with the West Lewis coastline is fundamentally deficient, neglecting to recognise it as a dynamic cultural landscape wherein environment, language, tradition, and community are deeply intertwined. The approach taken in the application is overly simplistic, reducing heritage to mere static assets and failing to acknowledge their ongoing social, cultural, and spiritual relevance within the community.

Particularly problematic is the handling of significant cultural sites such as the cemeteries at Dalmore, Bragar, and Barvas. These are not just historical markers; they serve as active burial grounds and places of spiritual significance. However, the assessment mistakenly categorises these sites as static features, overlooking their contemporary use and the implications of development on their surroundings. This lack of understanding leads to an inadequate evaluation of cultural impacts, disregarding the vital role these sites play in community life.

Moreover, there is a striking absence of consideration for intangible cultural heritage. Elements such as the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment are essential to the area's identity but are missing from the assessment. This omission represents a critical gap, as understanding the cultural impact of the proposed development necessitates the inclusion of these factors.

Concerns also arise regarding the rights and involvement of the community. The Gaelic-

speaking population embodies a unique cultural identity and possesses characteristics of an Indigenous People. However, there has been no process of Free, Prior and Informed Consent undertaken, which undermines the validity of the assessment and fails to adhere to the established principles of community participation in decisions that affect cultural and environmental interests.

A significant procedural shortcoming is the lack of a compliant Island Communities Impact Assessment, a requirement under the Islands (Scotland) Act 2018. The absence of this assessment hinders the competent authority's ability to fulfil its legal obligation to evaluate the social, cultural, and economic repercussions on the island community. This alone renders any determination unlawful.

From a policy standpoint, the aforementioned deficiencies put the proposal at odds with the National Planning Framework 4, particularly concerning the safeguarding of historic assets and sites. The failure to engage with both tangible and intangible heritage, alongside the neglect of living cultural practices, clearly deviates from policy obligations.

In summary, the failure to adequately assess living heritage, the value of intangible cultural aspects, community rights, and compliance with statutory requirements leads to a considerable evidential gap. The cultural repercussions of the proposed development have not been thoroughly evaluated, and the application falls short of providing a solid foundation for understanding the true cultural costs involved.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer commissioned a Social Impact Assessment that included focus groups with local residents, yet the full report has not been published, creating a significant evidential gap. This omission hinders both public understanding and the competent authority's ability to assess the extent of social risks identified through the developer’s research. Available summaries suggest 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, not speculation, but the lack of transparency surrounding the full assessment limits proper scrutiny of these findings.

Moreover, there is an indication that the proposal is viewed as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. However, these critical impacts have not been adequately integrated into the main application or assigned appropriate weight. The failure to disclose the complete Social Impact Assessment obscures the genuine human and social costs associated with the development.

This lack of transparency undermines the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health impacts is crucial for developments of this scale, especially when community character and functioning may be at risk. By withholding the complete dataset, the application lacks a comprehensive evidential basis for evaluating the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Development is required to foster positive health outcomes and avoid negative impacts, yet available evidence indicates existing adverse effects that have not been fully revealed. Without the complete assessment, compliance with this policy cannot be confirmed.

The procedural consequences of this situation are considerable. The competent authority cannot carry out a robust socio-economic and health evaluation without access to the full Social Impact Assessment. This absence signifies 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, alongside evidence of existing adverse effects, 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 evaluation of seascape, landscape, and visual impacts is significantly lacking, failing to capture the extent of change or the sensitivity of the environment involved. The character of the West Lewis coastline, characterised by its open Atlantic horizon and undeveloped nature, contributes to a strong sense of remoteness. The proposed large-scale turbines, situated near the shoreline, would impose a continuous and dominant industrial presence, thus fundamentally transforming this character and resulting in an irreversible alteration of the landscape.

The application does not sufficiently convey the magnitude of the anticipated visual change. The size and proximity of the turbines are such that they would dominate the views from residential areas, historic sites, and popular coastal locations. This would negatively impact visual amenity and degrade the essential qualities of naturalness and remoteness. The assessment does not adequately reflect the significance of this impact within the context of a sensitive landscape.

There are methodological issues concerning the choice and presentation of visual viewpoints. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly with respect to vital cultural heritage sites and high-value landscapes. This raises concerns that the magnitude of visual impact has been understated, thus compromising the reliability of the assessment.

Another major 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 situated within a broader landscape framework, linked through visual and spatial relationships to the Atlantic horizon. The assessment treats these sites in isolation, neglecting their interdependence, which

results in an incomplete evaluation of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, particularly concerning the preservation of natural places and historic assets. The proposed scale of change is at odds with the requirement to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further undermines any assertions of policy compliance.

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

In summary, the assessment does not accurately depict the scale of impact, the sensitivity of the environment, nor the interconnectedness of landscape and heritage. These deficiencies hinder a reliable evaluation and firmly establish the conclusion that the proposal is incompatible with the safeguarding of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is insufficient and lacks the necessary detail to fully evaluate potential environmental effects. The proposal entails significant seabed preparation and installation activities in a high-energy Atlantic environment, yet it does not present comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that are to be developed after consent is granted, which hinders a meaningful assessment of their adequacy or effectiveness.

This dependence on undefined future measures raises serious concerns, particularly given the sensitivity of the surrounding 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 acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on the prevention, control, or monitoring of these risks.

Moreover, there is considerable uncertainty regarding 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 impacts of these disturbances. This

uncertainty also affects potential consequences for marine species and habitats that have already been recognised as sensitive within the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a stage after consent, the application obstructs an evaluation of whether appropriate safeguards are established to manage pollution incidents. This introduces procedural risks and weakens the ability of the competent authority to assess environmental protection measures during the determination process.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment framework. Significant likely effects and mitigation measures must be assessed before consent is granted, and the absence of such information renders a lawful determination unachievable. Additionally, the application does not demonstrate compliance with policy requirements associated with 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 assessment materially deficient. These issues inhibit a thorough evaluation of construction and pollution risks, reinforcing the assertion 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 application fails to provide a comprehensive assessment of the onshore infrastructure associated with the project, which is critical given the intrinsic connection between the offshore turbines and the onshore works. This fragmented approach obscures the true scale of the environmental and socio-economic impacts that arise from what is fundamentally a single integrated project. Significant onshore elements, such as cabling across protected moorland, the construction of a substation near Stornoway, and associated access infrastructure through sensitive landscapes, have not been adequately evaluated. This includes excavation in areas of deep peat, particularly within Barvas Moor, an ecologically sensitive habitat and a crucial carbon store.

By not addressing the onshore impacts fully, the application fails to allow for a proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all project components be considered collectively; however, the separation of offshore and onshore elements means that the combined effects on peatlands, habitats, and local communities remain unclear. There are substantial risks to sensitive habitats, including machair systems and peatland environments, which are subject to existing policy protections. The proposal does not sufficiently demonstrate that impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been adopted, thus highlighting a significant evidential gap regarding biodiversity protection.

Concerns also arise related to the carbon balance due to the disturbance of peatland, which releases stored carbon and may create a carbon debt that contradicts the goals

of renewable energy development. The application does not adequately tackle this issue or confirm that the overall carbon balance is indeed beneficial. Moreover, the routing of infrastructure through active croft land poses potential conflicts with current land use and legal rights. There is no evidence provided that the necessary consents or processes have been initiated, which raises serious questions about the deliverability and lawful execution of the project.

From a policy standpoint, the inability to assess the project holistically and to demonstrate the protection of peatlands, habitats, and land use interests is at odds with the National Marine Plan and the National Planning Framework 4. The failure to show that adverse impacts can be avoided or mitigated further weakens the application. Collectively, these issues, including the disjointed assessment of project components and the lack of thorough evaluation of environmental and land use impacts, render this segment of the application incomplete and unreliable, 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.

TOURISM

The assessment concerning tourism impacts associated with the proposed development is critically inadequate and neglects to evaluate the economic and social repercussions for a vital sector of the Isle of Lewis economy. The area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness are essential to tourism, which has experienced notable growth from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and constituting up to 16% of the island's economy. Although the application indicates that 86% of visitors are attracted by the scenery, it lacks a quantified assessment of how the introduction of large-scale offshore infrastructure may influence visitor numbers, behaviours, or overall economic contributions.

Furthermore, the application does not analyse how the industrialisation of the seascape and the deterioration of environmental quality could affect Tourism Gross Value Added or the broader economic resilience of the island. Without this crucial analysis, it remains unclear whether the proposed development would bring about a net economic benefit or threaten an established and growing sector. The failure to take into account the significance of environmental quality in supporting tourism, including the vital role of unspoiled landscapes and dark skies in shaping visitor experiences and the growth of nature-based and astro-tourism markets, exacerbates this issue. Additionally, the lack of a Dark Skies Assessment results in a significant gap in understanding the impacts on a recognised and expanding aspect of the local economy.

In an island community characterised by limited economic diversification, the omission of tourism impact assessments has far-reaching implications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been evaluated as required by 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 need to illustrate net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector and fails to provide adequate evidence for competent authorities to evaluate the economic consequences of the proposal.

Collectively, the deficiencies in quantifying tourism impacts, assessing the environmental drivers of visitor behaviour, and recognising the economic dependency of the island create a substantial evidential gap. This hinders a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is procedurally and substantively unfit for determination, highlighting significant deficiencies in information and clear policy conflicts. The proposal fails to meet the requirements of sustainable development, not only in terms of statutory duties but also when measured against national policy and evidential standards. It echoes the unresolved core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. Now, it is presented within a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

Critical gaps in baseline data undermine the application, which uses an undefined design envelope and relies on unspecified mitigation measures. This lack of clarity extends to significant omissions, such as the failure to address impact pathways related to nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, inhibiting an adequate understanding of potential significant effects or residual impacts.

There are also notable procedural shortcomings. The absence of a compliant Island Communities Impact Assessment is a breach of statutory duty under the Islands (Scotland) Act 2018, while the failure to provide a full Social Impact Assessment represents a material omission. These issues obstruct the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for consideration.

The proposal directly conflicts with the National Planning Framework 4, as it does not adequately demonstrate protection for biodiversity, natural places, and cultural heritage. Furthermore, it fails to provide acceptable evidence regarding health and wellbeing impacts, alongside a lack of tourism impact modelling that prevents a demonstration of net economic benefit. The cumulative impacts of both offshore and onshore components have 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 exhibit internal inconsistencies. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been met, thereby engaging the precautionary principle and blocking a lawful conclusion that impacts are acceptable.

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

In light of these considerations, it is evident that the scale of information deficiencies, coupled with policy conflicts and unresolved environmental risks, precludes a lawful and evidence-based decision. 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

We already have plenty in this area enough is enough . Use water instead

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: C7B51AC4

Member of the public 1058

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, nearly pristine environment, and strong cultural identity. Concerns arise from the scale and proximity of the proposal, which raise significant questions about 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 material planning, environmental, cultural, and procedural deficiencies. The application does not provide a sufficient evidential basis for a lawful determination; critical environmental data is absent, and baseline information is both limited and inconsistent. Many aspects of the proposal remain undefined, while the use of a flexible design framework obscures the understanding of likely significant effects. Additionally, the reliance on unspecified mitigation measures renders it impossible to evaluate their effectiveness. Consequently, the documentation fails to offer a full understanding of environmental, cultural, or community impacts, undermining claims of negligible or non-significant effects due to a lack of robust evidence.

There are also clear and substantial conflicts with policy, as the proposal appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This is particularly evident in relation to biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. These conflicts are directly relevant to the statutory tests required for consent and compromise the competent authority's ability to determine the proposal as acceptable in policy terms.

Given the unprecedented scale of the proposal in this location, with large turbines positioned close to the shoreline, concerns about landscape capacity, visual dominance, and environmental impact are magnified. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance illustrates that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate and fails to present a complete, clear, or trustworthy account of the potential environmental effects of the

proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific turbine sizes, layouts, or configurations, creates considerable uncertainty. This uncertainty undermines the assessment's integrity and means that the impacts outlined may not accurately reflect the final development. As a result, both the public and the competent authority lack a true understanding of the environmental effects.

The application significantly depends on mitigation measures, monitoring strategies, and management plans that are not yet defined. This means that consent is being sought on the premise that environmental harm will be mitigated later, hindering a proper evaluation of effectiveness or assessment of remaining impacts. Deferring critical information to post-consent stages is procedurally unacceptable and contradicts the aim of the Environmental Impact Assessment process, which requires that likely significant effects and mitigation measures are clearly defined before any decision is made.

There are critical gaps in evidence, including deficiencies in baseline data, methodological limitations, and reliance on assumptions instead of site-specific evidence. This leads to uncertainty about the magnitude and significance of impacts, particularly when claims of negligible or non-significant effects are made without solid supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainties that cannot be aligned with statutory requirements.

Consequently, the application does not meet the evidential standards needed under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, including requirements for biodiversity protection and environmental integrity, as it cannot prove that impacts have been thoroughly assessed or that appropriate safeguards are in place.

Overall, the combination of an undefined design envelope, lack of specified mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings prevent a lawful and thorough evaluation of environmental effects, meaning that the competent authority cannot make an informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application presents significant deficiencies in the assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and evidence-based comparison of realistic alternatives based on their environmental impacts, it provides a narrative that details the project's evolution. This narrative approach does not adequately demonstrate that less harmful options have been effectively identified, assessed, and chosen over more damaging solutions.

Furthermore, there is a lack of transparent comparison regarding alternative offshore locations, development scales, or design configurations. Specifically, the assessment does not indicate that the developer has properly considered the option of placing turbines further offshore, where potential visual, ecological, and coastal impacts could be lessened. Considering the sensitivity of the West Lewis coastline and the critical role that proximity to shore plays in determining impact, the absence of such analysis raises serious questions about whether the proposed siting truly represents the least damaging option available.

The inadequacies also extend to the evaluation of cable routing and landfall assessments, as there is insufficient evidence that alternative routes have been adequately explored to minimise impacts on sensitive receptors. This includes areas of significant cultural and spiritual value, such as Barvas Cemetery. The lack of a clear strategy for avoidance and the absence of comparative analysis suggest that mitigation by design has not been adequately considered, with an undue reliance on post-design mitigation measures instead.

As a consequence, the application does not establish that environmental harm has been minimised through careful site selection, layout, and routing of infrastructure. This represents a failure to adhere to the established mitigation hierarchy and prevents the competent authority from determining whether less harmful and more suitable alternatives are available. In the absence of 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 adherence to National Planning Framework 4, particularly concerning the protection of natural environments, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a significant oversight that supports the conclusion that the application has not undergone sufficient evaluation and cannot warrant a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

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

Particularly concerning is the omission of otters, classified as a European Protected Species. The application does not adequately recognise or assess their active use of coastal areas for foraging and movement. By neglecting to consider their core foraging range and behavioural patterns, the potential effects of disturbances from construction, noise, and increased human activity have not been sufficiently evaluated. This significant oversight undermines the conclusions regarding the absence of adverse

effects on this species.

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

These methodological shortcomings mean that conclusions about negligible or non-significant effects rest on assumptions rather than robust evidence. Moreover, the lack of sufficient baseline data hampers any meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty surrounding the actual scale of risk posed to marine species and their habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed the protected species involved. The level of uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these conditions, consent cannot be legally granted.

Overall, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions results in an unreliable assessment. These shortcomings hinder a thorough evaluation of impacts on marine ecology and protected species, ultimately indicating that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment associated with the development is fundamentally flawed, characterised by significant gaps in evidence and internal inconsistencies that undermine its conclusions. The application fails to demonstrate to the required evidential standard that internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already in decline, will not be adversely affected. Key foraging areas and migratory pathways are located within the project area, yet the assessment does not thoroughly evaluate the implications of potential displacement, collision risk, or habitat loss.

There exists a contradiction in the application, as the developer asserts no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is necessary only when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions drawn are unsupported by the evidence provided. The assessment lacks sufficient proof that seabirds linked to protected sites such as the Lewis Peatlands and St Kilda will remain unaffected. It inadequately accounts for the significance of these feeding grounds,

relying on modelling methods that introduce uncertainty, particularly for species like Kittiwakes and Fulmars, which are already in severe decline. The methodologies employed are likely to underestimate mortality rates, especially when baseline data is lacking and behavioural responses are not fully understood.

The placement of turbines within a recognised migratory corridor creates an additional and significant risk, functioning as a barrier in a primary flight path utilised by species travelling between the United Kingdom and Iceland. The application fails to adequately consider the long-term consequences of sustained mortality within this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold needed to conclude 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 met. This engages the precautionary principle and prevents a lawful conclusion that would support consent. Furthermore, 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 unreliable due to its internal inconsistencies, methodological shortcomings, and insufficient evidence. These deficiencies hinder a comprehensive 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 West Lewis coastline represents a vibrant cultural landscape where environment, language, tradition, and community intertwine. However, the assessment of cultural heritage and community identity is fundamentally inadequate, treating heritage merely as isolated and static assets. This approach neglects the ongoing social, cultural, and spiritual roles that these elements play within the community.

A significant shortcoming is the treatment of culturally important sites, specifically the cemeteries at Dalmore, Bragar, and Barvas. These sites are active burial grounds and places of spiritual practice, yet they are mischaracterised as static features in the assessment. This oversight fails to acknowledge their continued use and meaning, and disregards how development impacts their settings, leading to an incomplete evaluation of cultural effects.

Furthermore, the assessment overlooks intangible cultural heritage, including the Gaelic language, traditions, and the enduring relationship between the community and its coastal environment. These elements are vital to the area's identity but have not been considered, resulting in a significant omission that impairs understanding of the development's cultural impact.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population embodies a unique cultural identity akin to that of an Indigenous People. Yet, there has been no process of Free, Prior and Informed Consent, which diminishes the legitimacy of the assessment. This lack of meaningful engagement does not align with recognised principles for participation in decisions affecting cultural and environmental interests.

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 obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone hinders lawful determination.

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

In summary, the failure to adequately assess living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been thoroughly examined, leaving the application insufficient for a proper evaluation of the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The social impacts, health, and wellbeing assessment for the development is seriously lacking and does not provide the necessary transparency for a valid evaluation. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents, but the full report remains unpublished. This creates a significant gap in evidence, preventing both the public and the competent authority from fully understanding the social risks revealed in the developer's own research.

Summaries available suggest that local residents are facing measurable levels of stress, anxiety, and concern due to the proposal's size and proximity. These impacts are based on direct engagement and are therefore concrete rather than speculative. However, the absence of the full assessment hinders thorough scrutiny of these findings and affects the ability to assess their significance in the decision-making process.

Evidence also suggests that the development is seen as a threat to community identity and cohesion, with the developer's findings identifying "cultural loss." Nevertheless, these impacts have not been adequately included in the main application or given the proper weight. The failure to publish the full Social Impact Assessment conceals the actual human and social costs associated with the development.

This lack of transparency undermines the Environmental Impact Assessment process. Understanding social, economic, and health impacts is critical for developments of this magnitude, especially when they may affect community character and functionality. By withholding the complete dataset, the application does not provide a thorough evidential basis for evaluating the balance of benefits and harms.

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4 regarding health and wellbeing. Developments should enhance positive health outcomes and avoid negative effects, yet the evidence presented indicates existing adverse impacts that have not been fully revealed. Without access to the complete assessment, compliance with this policy cannot be established.

The procedural ramifications are significant. The competent authority is unable to conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This represents a material shortcoming within the application and a failure to meet the evidential standards of the Environmental Impact Assessment framework.

In summary, the non-disclosure of the full Social Impact Assessment, along with evidence of existing negative impacts, results in an incomplete and unreliable assessment. This hinders a lawful determination and supports the conclusion that the application is not backed by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal involves the introduction of large-scale turbines near the West Lewis coastline, which is characterised by an open Atlantic horizon and a strong sense of remoteness. This area is noted for its undeveloped character, and the presence of such turbines would create a continuous industrial presence that would fundamentally alter the landscape, resulting in a permanent and irreversible transformation. The application fails to adequately represent the magnitude of the visual change that would occur. Due to their scale and proximity to the shoreline, the turbines would dominate views from residential areas, historic sites, and popular coastal locations, significantly impacting visual amenity and eroding the defining qualities of naturalness and remoteness.

Concerns also arise from the methodology used in selecting and presenting visual viewpoints. It appears that these viewpoints do not accurately represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This methodological flaw raises the risk that the magnitude of the visual impact has been understated, which undermines the reliability of the overall assessment.

Additionally, there is a significant deficiency in the assessment's consideration of the interconnected relationship between landscape, seascape, and cultural heritage. Heritage sites, such as the Calanais Standing Stones and other Scheduled Monuments,

are integral to a wider landscape setting that is visually and spatially linked to the Atlantic horizon. Treating these sites as isolated assets fails to acknowledge their interdependence, leading to an incomplete evaluation of impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are experienced and severing their ties to the natural horizon. This change represents not just a visual impact but a broader cultural and spatial harm that has not been properly assessed in the application.

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

Finally, the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would ensure their dominant presence, making the resulting change fundamental and permanent rather than reducible to an acceptable level through mitigation efforts. In summary, the assessment fails to accurately depict the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings prevent a reliable evaluation and support the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline features clean coastal waters and important habitats that are vulnerable to disturbance and contamination. The proposal, which involves significant seabed preparation and installation activities in a high-energy Atlantic environment, lacks comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are intended to be developed after consent is granted. This approach raises concerns, as it prevents a thorough assessment of these measures' adequacy and effectiveness.

The application acknowledges various risks, including sediment mobilisation and accidental chemical or oil spills, yet it does not offer sufficient detail on how these issues will be prevented, controlled, or monitored. Furthermore, there is uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological ramifications of these impacts, which could affect sensitive marine species and habitats already identified in the broader assessment.

The omission of detailed emergency response procedures further exacerbates these concerns. By postponing contingency planning until after consent, the application hampers the evaluation of whether appropriate safeguards exist to address pollution events. This introduces procedural risk and impairs the competent authority's ability to

assess environmental protection measures during the decision-making process.

From a regulatory standpoint, the deferral of essential environmental safeguards is at odds with the requirements set forth by the Environmental Impact Assessment regime. It is necessary to assess likely significant effects and mitigation measures prior to granting consent; without this information, a lawful determination cannot be reached. The application also fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts collectively result in a materially deficient assessment. These issues hinder a robust evaluation of construction and pollution risks, further substantiating the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry, yet the assessment of fisheries and marine life within the application is inadequate and lacks a thorough evaluation of both ecological and socio-economic impacts. A key concern is the assumption made in the application that fishing activities can be displaced without any consequences. There is no evidence presented to support the availability or accessibility of alternative fishing grounds that can withstand additional pressure. This significant omission raises the risk of overfishing in other areas, which may have broader economic repercussions for the local fishing fleet. Consequently, without a clear, evidence-based assessment, the implications for fisheries and livelihoods remain poorly understood.

Furthermore, the proposal poses substantial risks to marine species, particularly due to the underwater noise generated during the construction phase. The prolonged high-energy hammer piling is likely to cause disturbances over considerable distances, impacting species such as dolphins. Concerns arise from the predicted disturbance to a considerable portion of the local bottlenose dolphin population, yet the application tends to downplay these effects, lacking sufficient supporting evidence.

Additionally, there is an inconsistency within the application itself, as it acknowledges the need for licences to permit harm to European Protected Species while simultaneously describing the impacts as negligible. This contradiction undermines the credibility of the assessment and raises serious questions about compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

Moreover, the assessment neglects to consider cumulative impacts from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. The absence of a comprehensive evaluation of these combined effects hinders any determination of the overall impact on marine ecosystems and socio-economic conditions.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is incomplete and does not fully consider the impacts associated with what constitutes a single integrated project. The offshore turbines are intrinsically linked to the onshore works, yet these elements are assessed separately, leading to a fragmented approach that obscures the comprehensive scale of environmental and socio-economic effects.

The onshore components encompass cabling across protected moorland, the construction of a substation near Stornoway, and the necessary access infrastructure that traverses sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which is a vital carbon store and ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By deferring the assessment of onshore impacts, the application obstructs the evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all project components are examined in tandem; however, the separation of offshore and onshore elements leads to a lack of clarity regarding the combined effects on peatlands, habitats, and local communities.

There are significant risks posed to sensitive habitats, including machair systems and peatland environments, which enjoy policy protection. The application fails to demonstrate that the impacts on these habitats have been adequately assessed or that appropriate avoidance measures have been implemented. This results in a clear evidential gap concerning biodiversity protection.

Moreover, the routing of infrastructure through active croft land introduces the potential for conflicts with existing land use and legal rights. The application does not provide evidence that the requisite consents or processes have been initiated, thereby raising concerns about deliverability and lawful implementation.

From a policy standpoint, the failure to evaluate the project as a whole and to demonstrate the protection of peatlands, habitats, and land use interests contradicts the National Marine Plan and National Planning Framework 4. The inability to show that

impacts can be avoided or mitigated further weakens the application.

In summary, the fragmentation 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, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposed development introduces permanent red aviation lighting, which will be visible over long distances and will create a continuous and intrusive "wall of light" effect across the western horizon. This alteration will fundamentally impact the night-time environment of the West Lewis coastline, an area known for its exceptionally dark skies that contribute to environmental quality, cultural identity, and tourism value.

The Environmental Impact Assessment fails to evaluate the effects of this lighting on visual amenity, landscape character, and the experiences of residents and visitors. The significance of dark skies to the area's identity, alongside the growth of emerging tourism sectors such as astro-tourism, makes this omission particularly concerning. Consequently, there is a critical gap in understanding the overall landscape and environmental impacts of the proposal.

Moreover, there is no assessment of how the proposed lighting may affect nocturnal wildlife. Key species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting, which can lead to disorientation and an increased risk of collision. The application lacks any lighting impact assessment or phototaxis study, failing to examine the potential consequences of aviation lighting on these species and their mortality rates.

The reliance on daytime survey data in the ornithological assessment further exacerbates the situation, as it does not address nocturnal activity or the associated risks. For instance, Kittiwakes, which may forage or migrate at night, are vulnerable to disorientation from artificial lighting, yet this has not been evaluated. The absence of site-specific night-time data is a significant shortcoming that impedes a comprehensive understanding of ecological impacts.

Without a thorough assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would suffer adverse effects. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not satisfied, thereby invoking the precautionary principle and hindering 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. Additionally, this neglect undermines the assessment of landscape and seascape impacts, given that night-time character is an integral component of the environment.

Overall, the lack of assessment concerning dark skies and nocturnal wildlife presents a substantial evidential gap. The failure to provide baseline data, impact modelling, and species-specific analysis renders the application incomplete and insufficient to support a lawful determination.

TOURISM

The assessment presented in the application lacks a comprehensive evaluation of the tourism impacts, which are critical to the Isle of Lewis economy. With tourism reliant on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness, it is concerning that the application fails to provide a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of the sector. Notably, 86% of visitors are attracted by the scenery, yet this connection is not sufficiently explored.

The growth of tourism in the region has been remarkable, rising from £65 million in 2017 to over £81.5 million, and supporting more than 1,000 jobs while constituting up to 16% of the island's economy. However, the potential consequences of industrialising the seascape and the subsequent loss of environmental quality on Tourism Gross Value Added, as well as wider economic resilience, are overlooked in the application. This lack of modelling raises concerns about whether the proposed development would ultimately yield a net economic benefit or detriment to this vital sector.

Moreover, the assessment neglects to consider the environmental quality factors that underpin tourism, including the significance of unspoiled landscapes and dark skies for visitor experiences and emerging markets like nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this deficiency, leaving a critical gap in understanding how these factors contribute to a recognised and expanding area of the local economy.

In a context where the island community faces limited economic diversification, the oversight of tourism impacts carries broader implications for employment, local businesses, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been properly evaluated, contrary to the requirements set out in 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 need to illustrate net benefit. Furthermore, it conflicts with strategic objectives that prioritise tourism as a growth sector, failing to provide adequate evidence for the competent authority to assess the economic repercussions of the proposal.

Overall, the shortcomings in quantifying tourism impacts, assessing the environmental drivers of visitor behaviour, and recognising the island's economic dependency result in a significant evidential gap. This gap hinders a thorough evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the standards of sustainable development as outlined by statutory duties, national policy, and evidential criteria. This application revisits the core issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. It is now presented under a strengthened policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

Critical gaps in baseline data render the application inadequate and unreliable for determination. The use of an undefined design envelope, reliance on unspecified mitigation measures, and the omission of significant impact pathways—such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism—result in an incomplete Environmental Impact Assessment. This incompleteness obstructs a thorough understanding of likely significant effects and residual impacts.

Moreover, there are evident procedural shortcomings. The lack of a compliant Island Communities Impact Assessment breaches the statutory obligations outlined in the Islands (Scotland) Act 2018. Additionally, the failure to disclose the full Social Impact Assessment is a material omission that hinders the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

The proposal is also incompatible with National Planning Framework 4, as it does not adequately demonstrate protection of biodiversity, natural places, or cultural heritage. It fails to prove that health and wellbeing impacts are acceptable and lacks evidence of net economic benefit due to insufficient tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been properly evaluated, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially significant. Incomplete assessments of marine ecology, seabirds, protected species, and marine mammals, some of which are internally inconsistent, do not meet the evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle and prevents a lawful conclusion regarding the acceptability of impacts.

Furthermore, the proposal would lead to significant and irreversible changes to a sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual relationships, and the impacts on tourism are permanent effects that cannot be adequately mitigated.

Considering these factors, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, coupled with policy conflicts and unresolved environmental risks, impede a lawful and evidence-based decision. The competent authority must either refuse consent on these grounds or employ the

relevant regulatory provisions to mandate the submission of the missing information.

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

Additional Comments

Dear Sir/Madam,
These extraordinarily large turbines being erected on the land and shores of the Hebridean community in the name of Green Energy are unjustifiable.
The amount of materials and energy required to produce them, only for them to have a very limited life span is unjustifiable.
The amount of energy and problems it will create to dispose of these enormous structures once their life span ends is unjustifiable.
The destruction of wildlife and sealife which their presence will cause is unjustifiable.
The harm to the human body, health and wellbeing of the people in the local communities is unjustifiable. The harms caused by these enormous so-called 'Green Energy' structures far out ways the benefits.
This needs to be halted before the beautiful landscapes of the Outer Hebrides are altered and the damage is done and irreparable.
An alternative form of energy must be researched realistically and not forced on island communities and iconic Hebridean landscapes and seascapes admired across the globe.

Yours Sincerely,

[Redacted]
(Born in the beautiful Outer Hebrides)

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: FDEFBEA9

Member of the public 1059

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

Dear Sir/Madam

This letter represents a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under relevant marine licensing and Environmental Impact Assessment regimes. The objection is based on a review of the Environmental Impact Assessment Report and related documentation, highlighting several deficiencies related to planning, environmental concerns, cultural aspects, and procedural matters. The development is set to take place off the west side of the Isle of Lewis, a region known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

The application lacks a sufficient evidential basis necessary for a lawful determination. There is critical missing environmental data, while the baseline information provided is limited and inconsistent. Furthermore, important aspects of the proposal remain undefined. The flexible design framework used hinders a clear understanding of likely significant effects. Additionally, the application relies on mitigation measures that have not yet been specified, making it impossible to assess their effectiveness. Consequently, the documentation does not allow for a complete or informed understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects are not supported by robust evidence.

There are significant policy conflicts apparent in the application. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. The proposal fails to demonstrate compliance with national requirements that protect biodiversity, climate interests, and environmental integrity. These conflicts are directly related to the statutory tests needed for consent and undermine the competent authority's ability to conclude that the development is acceptable from a policy perspective.

The scale of this proposal is unprecedented in the area, with large turbines positioned near the shoreline. This raises substantial concerns about landscape capacity, visual dominance, and environmental impact. The lack of adequate information, the reliance on undefined mitigation measures, evidential weaknesses, and clear non-compliance with policies indicate that the application is incomplete and cannot support a lawful determination. In light of these circumstances, it is essential that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is lacking in material detail and does not offer a comprehensive, transparent, or reliable overview of the potential environmental

effects associated with the proposal. Significant uncertainty arises from the adoption of a flexible Project Design Envelope that does not commit to specific dimensions, layouts, or configurations for the turbines. This uncertainty compromises the integrity of the assessment, leading to a situation where the impacts described may not align with the eventual development, thereby hindering both public understanding and the competent authority's grasp of the actual environmental consequences.

Moreover, the application places considerable reliance on mitigation measures, monitoring strategies, and management plans that are not yet established. Seeking consent on the premise that any environmental harm will be mitigated at a later date obstructs a meaningful evaluation of their effectiveness and the assessment of residual impacts. This postponement of critical information to the post-consent phase is procedurally inappropriate and contravenes the aims of the Environmental Impact Assessment regime, which necessitates that significant effects and mitigation are clearly outlined before any determination can be made.

There are notable evidential gaps, including deficiencies in baseline data, methodological limitations, and the use of assumptions instead of site-specific evidence. Such shortcomings contribute to uncertainty regarding the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are made without robust supporting data. The lack of sufficient information inhibits a clear understanding of cumulative and worst-case scenarios, introducing scientific uncertainties that cannot comply with statutory obligations.

Consequently, the application does not fulfil the evidential standards mandated under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. The proposal fails to demonstrate alignment with National Planning Framework 4, which includes stipulations regarding the protection of biodiversity and environmental integrity, since it is not evident that impacts have been thoroughly assessed or that adequate safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specified mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings hinder a lawful and thorough evaluation of environmental effects, leaving the competent authority ill-equipped to make an informed decision based on the information presented.

ASSESSMENT OF ALTERNATIVES

The proposed development fails to demonstrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This oversight indicates a lack of adherence to the established mitigation hierarchy, leaving the competent authority unable to ascertain whether more suitable and less damaging alternatives are available. A thorough assessment of alternatives is essential and is a fundamental requirement of the Environmental Impact Assessment regime.

There is a significant absence of a transparent and evidence-based comparison of different offshore locations, development scales, or design configurations. Notably, the application does not show that the developer has thoughtfully considered the option of placing turbines further offshore, which would likely lessen visual, ecological, and coastal impacts. The West Lewis coastline is particularly sensitive, and the defining role of proximity to shore in determining impact highlights the importance of this analysis. The lack of such critical assessment obstructs any conclusion that the proposed siting is the least damaging option available.

Furthermore, deficiencies are evident in the evaluation of cable routing and landfall assessments, as there is inadequate evidence that alternative routes have been sufficiently explored to mitigate impacts on sensitive receptors. This includes significant sites of cultural and spiritual importance, such as Barvas Cemetery. The absence of a clear avoidance strategy and comparative analysis suggests that the application does not incorporate mitigation by design but instead relies heavily on post-design mitigation measures.

From a policy standpoint, these shortcomings impede compliance with National Planning Framework 4, particularly regarding the protection of natural spaces, cultural heritage, and community wellbeing. The lack of structured and comparative assessment constitutes a material omission that underlines the overall conclusion that the application has not undergone adequate scrutiny and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is fundamentally flawed and fails to provide a comprehensive understanding of the ecological receptors present. This marine system is known for its high sensitivity and biological activity. However, the baseline data is incomplete, and the methodologies employed do not sufficiently capture species presence, behaviour, and habitat utilisation. Consequently, the assessment lacks a sound evidential foundation necessary for evaluating potential impacts.

A significant oversight is the assessment of otters, which are classified as a European Protected Species. The application does not adequately acknowledge or evaluate their active use of coastal regions for foraging and movement. By neglecting to consider their core foraging range and behavioural patterns, the assessment inadequately addresses the potential effects of construction disturbances, noise, and increased activity. This gap undermines any claims regarding the absence of significant effects on this species.

Further shortcomings are evident in the evaluation of basking sharks, where the methodology relies on aerial surveys that carry inherent detection biases, particularly under Atlantic conditions. This approach 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. The failure to integrate or appropriately

assess such data contributes to an incomplete baseline, diminishing the reliability of the conclusions drawn.

These methodological issues result in assertions of negligible or non-significant effects being grounded in assumptions rather than solid evidence. The lack of sufficient baseline data 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 habitats.

From a regulatory standpoint, the application does not satisfy the criteria established by the Environmental Impact Assessment regime and National Planning Framework 4, as it has inadequately identified and assessed protected species. The uncertainty created by these deficiencies prevents the assurance that adverse effects can be excluded beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these circumstances, the granting of consent would not be lawful.

In summary, the presence of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions collectively undermine the reliability of the assessment. These inadequacies obstruct a thorough evaluation of impacts on marine ecology and protected species and lead to the conclusion that the application does not possess a sufficient evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, exhibiting significant evidence gaps and internal contradictions that cast doubt on its conclusions. It is situated in an area of the west coast of the Isle of Lewis that is critical for internationally important seabird populations, many of which are already experiencing declines. The application does not adequately demonstrate that these species will not be adversely affected, despite their presence in key foraging areas and migratory routes. There is a lack of robust evaluation regarding displacement, collision risk, or habitat loss associated with the development.

Notably, a contradiction arises within the application itself, where the developer asserts that there will be no significant adverse effects while simultaneously advocating for a Habitats Regulations derogation case, which only applies when significant harm is anticipated. This inconsistency raises concerns about the reliability of the assessment, suggesting that the conclusions drawn are unsupported by the available evidence. Furthermore, the assessment fails to substantiate that seabird populations linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The crucial nature of these feeding grounds is not sufficiently acknowledged, and the reliance on modelling creates uncertainty, particularly for species like Kittiwakes and Fulmars that are in severe decline. The methodologies employed are likely to underestimate potential mortality, especially in light of incomplete baseline data and insufficient understanding of behavioural responses.

The positioning of turbines within a recognised migratory corridor introduces another significant risk, effectively acting as 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, along with potential effects on species with relatively small global populations, are not adequately assessed in the application.

From a regulatory standpoint, the application does not fulfil the evidential requirements necessary to ascertain no adverse effect on the integrity of protected sites. The combination of contradictory conclusions, data gaps, and modelling limitations indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and hinders a lawful conclusion that would support the granting of consent. Additionally, these deficiencies demonstrate non-compliance with National Planning Framework 4 concerning biodiversity protection and the preservation of natural assets. The failure to show that internationally important seabird populations will not face adverse effects places the proposal at odds with national policy.

In conclusion, the assessment's reliability is undermined by internal inconsistencies, methodological inadequacies, and a lack of sufficient evidence. These shortcomings hinder a thorough evaluation of impacts and contribute to the overall determination that the application does not satisfy the statutory requirements needed for a lawful decision.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment regarding cultural heritage and community identity is fundamentally flawed and fails to recognise the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply intertwined. The application adopts a simplistic viewpoint, treating heritage as isolated and static assets, neglecting their ongoing social, cultural, and spiritual significance within the community.

A significant shortcoming is evident in the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites of burial and spiritual practice; however, the assessment erroneously categorises them as static features, ignoring their continued relevance and the implications of development on their surroundings. This misrepresentation leads to an incomplete assessment of cultural impacts and overlooks their integral role in community life.

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

Concerns also arise regarding community rights and engagement. The Gaelic-speaking

population possesses a unique cultural identity, recognised as having characteristics of an Indigenous People, yet the process of Free, Prior and Informed Consent has not been conducted. This lack of meaningful engagement undermines the legitimacy of the assessment and neglects to reflect established principles regarding participation in decisions that impact cultural and environmental interests.

A critical procedural deficiency is the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic effects on the island community. This omission alone renders a lawful determination unachievable.

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing associated with the proposed development lacks necessary transparency, leading to a materially deficient evaluation. Although the developer commissioned a Social Impact Assessment that involved focus groups with local residents, the full report remains unpublished. This situation creates a significant evidential gap, which restricts both public insight and the competent authority's ability to fully comprehend the extent of the social risks identified by the developer’s research.

Residents are reportedly experiencing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposed project. These impacts stem from direct engagement and are therefore grounded in reality, not mere speculation. The inability to disclose the complete assessment inhibits proper examination of the findings and limits the capability to evaluate their significance in the decision-making process.

Furthermore, the proposal appears to threaten community identity and cohesion, with “cultural loss” highlighted in the developer’s findings. Despite this recognition, such impacts have not been adequately integrated into the main application or considered with the seriousness they warrant. By withholding the complete Social Impact Assessment, the developer obscures the genuine human and social costs that the development may impose.

This lack of transparency significantly undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when they may affect community character and functioning. The failure to provide the full dataset means the application does not offer a comprehensive evidential basis necessary to assess the balance between potential benefits and harm.

From a policy perspective, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Developments are required to promote positive health outcomes and mitigate harm; however, the evidence available suggests existing adverse effects that remain undisclosed. Without access to the full assessment, it cannot be shown that compliance with this policy is met.

The procedural ramifications of this situation are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment, which constitutes a material omission in the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

Collectively, the non-disclosure of the full Social Impact Assessment, alongside evidence of current adverse impacts, renders the overall assessment incomplete and unreliable. This scenario obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon and undeveloped landscape, offering a strong sense of remoteness. The proposed large-scale turbines near the shoreline would introduce a dominant industrial presence that would permanently alter this unique character. The assessment of visual impacts fails to accurately convey the extent of this change. The turbines would significantly affect views from residential areas, historic sites, and popular coastal locations, leading to a loss of visual amenity and diminishing the qualities of naturalness and remoteness.

There are significant concerns about how visual viewpoints were selected and presented. Some viewpoints may not adequately represent the most sensitive areas or worst-case scenarios, especially concerning cultural heritage sites and valuable landscapes. This could lead to an understatement of the visual impact, raising doubts about the assessment's reliability.

Moreover, the assessment does not take into account the interconnectedness of landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape linked visually and spatially to the Atlantic horizon. By treating these sites as isolated, the assessment fails to consider their interdependent relationships, resulting in an incomplete evaluation of their setting and cultural importance.

The proposed industrialisation of the seascape would disrupt these connections, changing how heritage assets are experienced and their relationship with the natural horizon. This change represents a visual and broader cultural impact that has not been properly addressed in the application.

From a policy standpoint, the proposal contradicts National Planning Framework 4, particularly regarding the protection of natural landscapes and historic assets. The proposed changes are incompatible with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a solid worst-case assessment further weakens any assertion of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. Given the size, height, and location of the turbines, their visual dominance would be unavoidable. Consequently, the change to the landscape would be fundamental and permanent, not 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 interconnectedness of landscape and heritage. These shortcomings prevent a reliable evaluation and strengthen the argument that the proposal is not compatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks associated with the proposal is significantly lacking in detail, which hinders the ability to evaluate the likely environmental impacts. The project entails substantial seabed preparation and installation works in a high-energy Atlantic environment. However, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included in the application. Instead, it relies on mitigation and contingency measures that are to be devised after consent has been granted, making it impossible to adequately assess their effectiveness or sufficiency.

This reliance on vague future measures is particularly alarming given the sensitivity of the surrounding environment. The West Lewis coastline is home to clean coastal waters and essential habitats that are at risk of sediment disturbance and contamination. The application does acknowledge various risks, including sediment mobilisation and the potential for accidental chemical or oil spills, yet it fails to outline sufficient strategies for prevention, control, or monitoring of these risks.

Moreover, there is uncertainty concerning the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. The lack of robust modelling and well-defined management strategies means that 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 identified as sensitive within the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning to a post-consent stage, the application does not allow for an evaluation of whether adequate safeguards are in place to address pollution incidents. This introduces procedural risk and undermines the competent authority's ability to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of critical environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation strategies are evaluated before consent is granted. When this information is missing, a lawful determination cannot be made. Furthermore, the application does not demonstrate compliance with policy requirements regarding environmental protection and water quality.

In summary, the combination of undefined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts results in a materially deficient assessment. These shortcomings obstruct a thorough evaluation of construction and pollution risks and reinforce the argument that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry, both of which are at risk from the proposed development. The application fails to provide a thorough evaluation of the ecological and socio-economic impacts, particularly regarding fisheries and marine life. A key concern is the assumption that fishing activities can be displaced without adverse consequences. There is no evidence presented that alternative fishing grounds are available, accessible, or capable of absorbing any additional pressure. This is a critical omission, as it raises the potential for overfishing in other areas, which could have detrimental economic effects on the local fishing fleet. Without a robust and evidence-based assessment, it is impossible to fully understand the implications for fisheries and the livelihoods dependent on them.

Moreover, the proposal poses significant risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling for an extended period is likely to disturb marine life over large distances, notably affecting local species such as dolphins. The application underestimates the impact on a considerable portion of the local bottlenose dolphin population, raising serious concerns, yet it fails to provide sufficient evidence to support its conclusions regarding these effects.

There are clear inconsistencies within the application, as it acknowledges the need for licences to permit harm to European Protected Species, while simultaneously categorising the impacts as negligible. This contradiction calls into question the credibility of the assessment and raises serious concerns regarding compliance with the Habitats Regulations, especially where potential harm necessitates legal

authorisation.

Furthermore, the assessment overlooks cumulative impacts arising from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a comprehensive evaluation of these combined effects, it is impossible to determine the overall impact on marine ecosystems and socio-economic conditions.

From a policy perspective, 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, which prevents any conclusion that the proposal represents sustainable development.

In summary, the deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the application result in an assessment that is incomplete and unreliable. These shortcomings hinder a robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The offshore turbines and onshore works are interconnected, yet the assessment treats them separately. This fragmented approach fails to capture the overall environmental and socio-economic effects of what is a single integrated project.

Onshore elements involve cabling across protected moorland, the construction of a substation near Stornoway, and the creation of access infrastructure through sensitive landscapes. These activities entail excavation across areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and ecologically sensitive habitat. The application does not adequately assess these impacts, limiting the understanding of the project's total environmental footprint.

By excluding or postponing the assessment of onshore impacts, the application hinders a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project be considered together, yet the separation leads to an incomplete 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 fails to show that these impacts have been thoroughly assessed or that suitable avoidance measures have been implemented. This creates a significant evidential gap regarding biodiversity protection.

Concerns about carbon balance also arise from the proposal. Disturbance of peatland can release stored carbon, potentially leading to a carbon debt that contradicts renewable energy development goals. The application does not sufficiently address this

issue or confirm that the overall carbon balance remains advantageous.

Furthermore, routing infrastructure through active croft land may conflict with existing land use and legal rights. The application lacks evidence that necessary consents or processes have been initiated, prompting questions about deliverability and lawful execution.

From a policy standpoint, the failure to assess the project holistically 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 prove that impacts can be avoided or mitigated further weakens the application.

Overall, the separation of project components, the lack of comprehensive assessment, and insufficient evidence regarding environmental and land use impacts render this part of the application incomplete and unreliable, 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 evaluation of tourism impacts within the application is significantly lacking, with a failure to assess the economic and social ramifications for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. While the application indicates that 86% of visitors are attracted by the scenery, it does not provide any quantified assessment regarding how the introduction of large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution of this sector.

Tourism has seen substantial growth, rising from £65 million in 2017 to over £81.5 million currently, supporting more than 1,000 jobs and representing up to 16% of the island's economy. However, the application does not analyse how the industrialisation of the seascape and the degradation of environmental quality could affect Tourism Gross Value Added or the broader economic resilience of the island. The lack of such an assessment means it is impossible to ascertain whether the proposed development would yield a net economic benefit or threaten an established and expanding sector.

Moreover, the assessment neglects the crucial role that environmental quality plays in attracting tourists, particularly regarding the preservation of unspoiled landscapes and dark skies that enhance visitor experiences. This oversight is further exacerbated by the omission of a Dark Skies Assessment, resulting in a significant gap in understanding the implications for a recognised and burgeoning segment of the local economy, such as nature-based tourism and astro-tourism.

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

From a policy standpoint, the application fails to demonstrate adherence to National Planning Framework 4, particularly concerning economic impacts and the need to show a net benefit. It also contradicts strategic objectives that prioritise tourism as a

growth sector, lacking sufficient evidence for the competent authority to evaluate the economic consequences of the proposal adequately.

Overall, the combined failure to quantify tourism impacts, assess the environmental drivers that influence visitor behaviour, and recognise the economic dependencies of the island culminates in a significant evidential gap. This deficiency hinders a thorough evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm 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.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 4478A44D

Member of the public 1060

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the marine licensing and Environmental Impact Assessment regulations. The objection is grounded in a detailed review of the Environmental Impact Assessment Report alongside other supporting documents, highlighting several material deficiencies related to planning, environmental factors, cultural concerns, and procedural aspects. Situated off the west side of the Isle of Lewis, the proposed development area is characterized by its Atlantic-facing coastline, a near-pristine environment, and a significant cultural identity. The size, proximity, and design of the wind farm raise serious questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks sufficient evidence for a lawful determination. There are substantial gaps in critical environmental data, with baseline information that is both limited and inconsistent, and many elements of the proposal remain undefined. The flexible design framework employed obscures an understanding of likely significant effects, and the dependence on unspecified mitigation measures renders any assessment of their effectiveness impossible. Consequently, the supporting documentation does not facilitate a comprehensive understanding of the environmental, cultural, or community impacts, and assertions regarding negligible or non-significant effects are not backed by robust evidence.

There are evident policy conflicts within the proposal. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regulations, and National Planning Framework 4, especially concerning biodiversity, natural areas, cultural heritage, and public health and wellbeing. The application fails to establish that it can meet national standards for protecting biodiversity, climate interests, and environmental integrity. These discrepancies are crucial as they pertain to the statutory tests necessary for consent and compromise the competent authority's ability to determine the development's acceptability in policy terms.

The scale of the proposed wind farm is unprecedented for this location, with large turbines set very close to the shoreline, which raises significant concerns about landscape capacity, visual dominance, and overall environmental impact. Collectively, the insufficient information provided, reliance on undefined mitigation strategies, evidential deficiencies, and clear non-compliance with policy indicate that the application is incomplete and unable to facilitate a lawful decision. In light of these issues, it is essential that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application presents significant evidential deficiencies, marked by notable gaps in baseline data, limitations in methodology, and reliance on assumptions rather than site-specific evidence. This leads to uncertainty concerning the scale and significance of impacts, especially in instances where conclusions of negligible or non-significant effects are stated without robust supporting data. A lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot align with statutory requirements.

The Environmental Impact Assessment Report is fundamentally deficient and fails to provide a full, transparent, or reliable account of the potential environmental effects of the proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates substantial uncertainty. This ambiguity undermines the integrity of the assessment and means that the impacts outlined may not correspond to the development ultimately realised, thus hindering both public understanding and the competent authority's ability to ascertain the true extent of environmental effects.

Furthermore, the application is heavily reliant on mitigation measures, monitoring strategies, and management plans that are not yet defined. Consent is sought under the premise that environmental harm will be mitigated at a later stage, which obstructs any meaningful evaluation of effectiveness or assessment of residual impacts. This deferment of critical information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which necessitates that likely significant effects and mitigation measures are clearly established before determination.

As a result, the application does not satisfy the evidential threshold required under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, particularly concerning protected species and sensitive habitats. The proposal also does not demonstrate compliance with National Planning Framework 4, which includes stipulations related to biodiversity protection and environmental integrity, as it cannot be substantiated that impacts have been fully assessed or that adequate safeguards are in place.

In summary, the combination of reliance on an undefined design envelope, the absence of specified mitigation measures, and existing gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings prevent a lawful and thorough assessment of environmental effects and indicate that the competent authority lacks the necessary basis to determine the application based on the information available.

ASSESSMENT OF ALTERNATIVES

The application significantly lacks a proper assessment of alternatives, which fails to meet the necessary standards outlined in the Environmental Impact Assessment regime. Instead of offering a coherent, evidence-based comparison of viable options based on their environmental consequences, it presents merely a narrative of how the

project has evolved. This narrative does not adequately prove that less harmful alternatives have been identified, assessed, and prioritised over more damaging choices.

Moreover, there is an absence of clear and evidence-based comparisons regarding alternative offshore sites, development scales, or design configurations. Specifically, the application does not reflect that the developer has adequately considered the potential for placing turbines further offshore, where there would likely be less visual, ecological, and coastal impact. The West Lewis coastline's sensitivity and the significance of proximity to shore in evaluating impacts mean that without such analysis, it is impossible to conclude that the chosen location is indeed the least harmful.

The shortcomings also extend to the evaluation of cable routing and landfall assessments, which lack sufficient evidence that alternative routes have been thoroughly investigated to minimise impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The failure to establish a clear avoidance strategy and the absence of comparative analysis highlight a neglect of design-based mitigation measures, relying instead on mitigation strategies implemented after design.

Consequently, the application does not show that environmental harm has been adequately reduced through careful site selection, layout decisions, and infrastructure routing. This constitutes a failure to adhere to the recognised mitigation hierarchy, leaving the competent authority unable to ascertain whether more appropriate and less harmful alternatives are available. Without a comprehensive alternatives assessment, one cannot conclude that the proposal meets the standards of sustainability or is compliant with policy.

From the perspective of policy compliance, this deficiency undermines adherence to National Planning Framework 4, particularly concerning the safeguarding of natural areas, cultural heritage, and community wellbeing. The lack of a systematic and comparative assessment is a significant omission that ultimately leads to the conclusion that the application has not been sufficiently evaluated and cannot support a lawful decision.

MARINE ECOLOGY AND PROTECTED SPECIES

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

A notable shortcoming is the omission of otters, which are a European Protected

Species. The application does not adequately recognise or assess their active use of coastal areas for foraging and movement. This oversight in considering their core foraging range and behavioural patterns means that the potential effects of construction disturbance, noise, and increased activity remain insufficiently assessed. As a result, any conclusions drawn regarding the absence of significant effects on this species are compromised.

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment provided is fundamentally unreliable, featuring significant internal inconsistencies and substantial gaps in evidence that undermine its conclusions. It fails to adequately demonstrate that internationally important seabird populations, many of which are already in decline, will not be adversely affected by the proposed development on the west coast of the Isle of Lewis. This area includes key foraging zones and migratory pathways, yet the assessment does not properly evaluate the risks associated with displacement, collision, or habitat loss.

A critical contradiction exists within the application; while the developer asserts that there will be no significant adverse effects, they also pursue a Habitats Regulations

derogation case, which is only relevant where significant harm is anticipated. Such inconsistencies raise serious doubts about the credibility of the assessment and suggest that its conclusions lack the necessary supporting evidence.

The evidence presented is insufficient to assure that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The assessment does not fully account for the significance of these feeding grounds, and its reliance on modelling techniques introduces uncertainty, particularly concerning species that are experiencing severe decline, like Kittiwakes and Fulmars. Methodologies used in the assessment are likely to underestimate mortality, especially given the incomplete baseline data and the lack of understanding regarding behavioural responses.

Moreover, the siting of turbines within a recognized migratory corridor poses an additional and substantial risk, as it effectively creates a barrier in a primary flight path for 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 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 effects on the integrity of protected sites. The presence of contradictory conclusions, coupled with data gaps and limitations in modelling, means the standard of beyond reasonable scientific doubt has not been reached. This invokes the precautionary principle, which prevents a lawful conclusion in support of consent.

These deficiencies also constitute a failure to adhere to National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally significant seabird populations will remain unaffected places the proposal in direct conflict with national policy.

Overall, the assessment's weaknesses in methodology, evidence, and internal consistency lead to the conclusion that it does not fulfill the statutory requirements necessary for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity demonstrates significant inadequacies, failing to recognise the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply intertwined. Rather than appreciating the ongoing social, cultural, and spiritual functions of heritage within the community, the application adopts a simplistic viewpoint that treats heritage as a collection of isolated, static assets.

A notable shortcoming in the application is its handling of culturally significant sites, particularly the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active places of burial and spiritual practice, yet the assessment wrongly categorises them as static features. This oversight neglects their continued use and significance

and disregards how development would affect their surroundings. Such mischaracterisation leads to an incomplete understanding of cultural effects and overlooks their essential role in community life.

Moreover, the application does not address intangible cultural heritage, such as the Gaelic language and traditions, alongside the community's long-standing relationship with the coastal environment. These factors are central to the area's identity and are absent from the assessment, representing a significant gap. Without the inclusion of these elements, the true cultural impact of the proposed development cannot be accurately gauged.

There are additional concerns regarding the rights and engagement of the community. The Gaelic-speaking population embodies a distinct cultural identity recognised as part of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent conducted. This lack of genuine engagement undermines the credibility of the assessment and neglects established principles of participation in matters that affect cultural and environmental interests.

Furthermore, a critical procedural deficiency exists in the absence of a compliant Island Communities Impact Assessment, which is a statutory requirement under 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 at odds with the National Planning Framework 4, especially concerning the preservation of historic assets and sites. The failure to consider both tangible and intangible heritage, alongside an acknowledgment of living cultural practices, indicates a clear deviation from policy requirements.

In summary, the neglect to assess living heritage, intangible cultural values, community rights, and statutory obligations results in a considerable evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application does not provide a firm foundation for assessing the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer has commissioned a Social Impact Assessment that includes focus groups with local residents; however, the full report has not been published. This represents a significant evidential gap, which hinders both public understanding and the competent authority's ability to assess the full extent of the social risks identified through the developer’s research. Available summaries suggest that residents are already experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal, highlighting the immediate social impacts that have emerged from direct community engagement.

Furthermore, there is a notable perception among residents that the proposal threatens

community identity and cohesion, with evidence of "cultural loss" identified in the developer's findings. Unfortunately, these findings have not been adequately integrated into the main application or given the appropriate consideration. The decision to withhold the full Social Impact Assessment obscures the true human and social costs associated with the development, which is essential for informed decision-making.

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, particularly when the character and functioning of the community may be at stake. Without the complete dataset, the application fails to provide a thorough evidential basis for assessing the balance between potential benefits and the associated harms.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. It is essential that development supports positive health outcomes and mitigates harm; however, the evidence available indicates the presence of existing adverse effects that have not been fully disclosed. Thus, without the complete assessment, it cannot be established that the application meets this policy requirement.

The procedural implications of this situation are significant. The competent authority is unable to conduct a robust socio-economic and health evaluation in the absence of the full Social Impact Assessment, which constitutes a material omission within the application and a failure to meet the evidential standards of the Environmental Impact Assessment regime. Collectively, the non-disclosure of the full Social Impact Assessment, coupled with the evidence of existing adverse impacts, results in an incomplete and unreliable assessment. This ultimately prevents a lawful determination and underscores the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, seascape, and landscape is significantly lacking and does not reflect the sensitivity of the environment or the scale of change adequately. The West Lewis coastline, characterised by an open Atlantic horizon and an undeveloped character, offers a strong sense of remoteness. The introduction of large-scale turbines near the shoreline would create an overwhelming industrial presence that would fundamentally alter this character, leading to a permanent and irreversible transformation of the landscape.

The application fails to accurately represent the extent of visual change. Given the scale and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations. This would have a direct impact on visual amenity, eroding the essential qualities of naturalness and remoteness. The assessment does not properly convey the significance of this impact, especially within such a sensitive landscape.

Concerns arise over the selection and presentation of visual viewpoints in the assessment. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly in relation to significant cultural heritage sites and valuable landscapes. This raises the possibility that the magnitude of visual impact has been underestimated, which undermines the reliability of the assessment.

Moreover, the application fails to evaluate the interconnected relationship between landscape, seascape, and cultural heritage effectively. Important 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 treats these sites as isolated assets, neglecting their interdependence and resulting in an incomplete evaluation of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 concerning the protection of natural places and historic assets. The extent of change proposed is incompatible with the need to safeguard landscape character, visual amenity, and the context of culturally significant sites. The lack of a robust worst-case assessment further undermines the claim of compliance with policy.

Additionally, it is evident that the identified impacts cannot be effectively mitigated. The dominant and unavoidable presence of the turbines, due to their scale, height, and proximity, means that the resulting changes are fundamental and permanent, rather than capable of being reduced to an acceptable level through mitigation.

In summary, the assessment does not accurately represent the scale of impact, the sensitivity of the environment, or the interconnected nature of landscape and heritage. These deficiencies hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal 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 detail needed to evaluate potential environmental effects. There are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included in the application. Instead, it relies on mitigation and contingency measures that will be developed after consent is granted, hindering any meaningful assessment of their adequacy.

This reliance on undefined future measures is especially troubling given the sensitivity of the receiving environment along the West Lewis coastline, which is home to clean

coastal waters and important habitats that are at risk of sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it does not provide enough detail on how these risks will be prevented, controlled, or monitored.

Furthermore, there is uncertainty about the scale and behaviour of sediment plumes that may arise from seabed disturbance and cable installation. Without solid modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also applies to the potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application obstructs the evaluation of whether appropriate safeguards are in place to address pollution events. This introduces procedural risk and undermines the competent authority's ability to assess environmental protection measures during the determination process.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the Environmental Impact Assessment regime's requirements. Significant effects and mitigation must be evaluated prior to consent, and without this information, a lawful determination cannot be reached. Additionally, the application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the absence of clearly defined mitigation measures, detailed management plans, and the uncertainty about potential impacts render the assessment deficient. These shortcomings prevent a thorough evaluation of construction and pollution risks, further indicating that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the application presents an inadequate assessment of fisheries and marine life, failing to provide a reliable evaluation of both ecological and socio-economic impacts. There is a troubling assumption that fishing activities can be displaced without consequences, yet the application does not offer evidence that alternative fishing grounds exist or are accessible to accommodate the additional pressure. This significant omission raises concerns about potential overfishing in other areas and could have broader economic ramifications for the local fishing fleet.

Furthermore, the proposal carries substantial risks to marine species, particularly due to underwater noise from construction activities. The extended use of high-energy hammer piling is anticipated to cause disturbances across large distances, which could adversely affect species such as dolphins. Alarmingly, the predicted disturbance to a notable portion of the local bottlenose dolphin population is downplayed within the

application, lacking sufficient supporting evidence to address these serious concerns.

There is also a notable inconsistency in the application regarding the need for licences to permit harm to European Protected Species, as it acknowledges the requirement for such authorisation while simultaneously describing the impacts as negligible. This contradiction undermines the assessment's credibility and raises issues about compliance with the Habitats Regulations, especially where anticipated harm necessitates legal approval.

Moreover, the assessment neglects to consider cumulative impacts resulting from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, the overall impact on marine ecosystems and the socio-economic landscape remains uncertain.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 or the National Marine Plan. It fails to establish that the development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, thus hindering the conclusion that this proposal constitutes sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The onshore infrastructure assessment is incomplete and does not consider the full range of impacts associated with this integrated project. The offshore turbines and onshore works are connected, yet they are evaluated separately, leading to a fragmented understanding of the environmental and socio-economic effects.

Onshore elements include cabling through protected moorland, the construction of a substation near Stornoway, and access infrastructure in sensitive landscapes. These activities involve excavating 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 hampers understanding of the project’s total environmental footprint.

By omitting or delaying the assessment of onshore impacts, the application prevents a proper evaluation of cumulative effects. The Environmental Impact Assessment process requires all project components to be considered together. The separation of onshore and offshore elements obscures the combined impacts on peatlands, habitats, and local communities.

Significant risks to sensitive habitats, including machair systems and peatland environments, are evident, with these areas receiving policy protection. The application

does not adequately demonstrate that impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, highlighting a gap in biodiversity protection.

Concerns also arise regarding carbon balance. Disturbing peatland can release stored carbon, potentially leading to a carbon debt that undermines renewable energy objectives. The application does not sufficiently address this issue or prove that the overall carbon balance is advantageous.

Moreover, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application lacks evidence of necessary consents or processes being initiated, creating uncertainties about deliverability and legal compliance.

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

Overall, the division of project components, the lack of a comprehensive assessment, and insufficient evidence of environmental and land use impacts make this part of the application incomplete and unreliable, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife represents a significant oversight within the Environmental Impact Assessment. The West Lewis coastline boasts remarkably dark skies, which are vital to the area's environmental quality, cultural identity, and tourism potential. The proposal includes the installation of permanent red aviation lighting that will be visible over extensive distances, leading to a continuous and intrusive “wall of light” effect on the western horizon, fundamentally changing the night-time landscape.

Moreover, the application fails to evaluate the implications of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This lack of consideration is particularly concerning given the critical role dark skies play in the identity of the area and the growth of sectors such as astro-tourism. The resulting gap in the overall assessment of the landscape and environment is evident.

Equally troubling is the absence of an evaluation of the impacts on nocturnal wildlife. Notably, species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly sensitive to artificial lighting, which can cause disorientation and increase the risk of collisions. The application lacks any lighting impact assessment or phototaxis study, meaning it does not adequately consider how aviation lighting may affect these species or contribute to increased mortality rates.

The reliance on daytime survey data in the ornithological assessment further

exacerbates this issue, as it fails to account for nocturnal activity or associated hazards. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been taken into account. The absence of site-specific data for night-time creates a crucial gap in understanding the ecological impacts involved.

Without a thorough assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would face adverse effects. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt cannot be achieved, which invokes the precautionary principle and obstructs a lawful determination.

From a policy standpoint, this omission is at odds with National Planning Framework 4 concerning the protection of natural spaces and the maintenance of environmental quality. Additionally, it undermines the comprehensive evaluation of landscape and seascape impacts, as the night-time character is an essential component of the environment.

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

TOURISM

The assessment of the potential impacts on tourism is significantly inadequate and neglects to examine the economic and social ramifications for a crucial sector of the economy on the Isle of Lewis. Tourism relies heavily on the region's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. Although the application notes that 86% of visitors are attracted by the scenery, it fails to provide a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or overall economic contributions.

Tourism has experienced substantial growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and constituting as much as 16% of the island's economy. Nevertheless, the application does not evaluate how the industrialisation of the seascape and the resultant decline in environmental quality would affect Tourism Gross Value Added or the overall resilience of the economy. In the absence of this analysis, it remains unclear whether the development would yield a net economic benefit or jeopardise an established and flourishing sector.

Moreover, the assessment overlooks the significance of environmental quality in bolstering tourism, particularly the role of unspoiled landscapes and dark skies in shaping the visitor experience and fostering emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a substantial void in understanding the impacts on this recognised and expanding aspect of the local economy.

In a context where the island community has limited economic diversification, the failure to evaluate impacts on tourism carries broader implications for employment, local businesses, and community sustainability. The omission of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been considered as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, especially regarding economic impact and the necessity to provide evidence of net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector, failing to furnish sufficient evidence for the competent authority to assess the economic implications of the proposal.

Collectively, the shortcomings in quantifying tourism impacts, evaluating the environmental factors that influence visitor behaviour, and considering the island's economic dependence create a significant evidential gap. This gap hinders a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm signifies a significant failure to meet the standards of sustainable development as required by statutory duties, national policy, and evidential criteria. This application echoes the principal issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Presenting this application under a stronger policy framework, which emphasises the importance of biodiversity, peatland conservation, landscape integrity, and community welfare, does not mitigate these concerns.

The evidential basis for the application remains incomplete and unreliable. There are crucial gaps in the baseline data, the design envelope remains undefined, and reliance on unspecified mitigation measures raises significant concerns. Key impact pathways have been omitted from the assessment, including effects on nocturnal wildlife, comprehensive onshore infrastructure, and potential tourism impacts. Consequently, the Environmental Impact Assessment lacks completeness, hindering a thorough understanding of likely significant effects and residual impacts.

Moreover, procedural deficiencies are evident. The lack of a compliant Island Communities Impact Assessment is a breach of statutory obligation under the Islands (Scotland) Act 2018. Additionally, the failure to provide a complete Social Impact Assessment represents a significant omission, limiting the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic stability, thus rendering the application unsuitable for determination.

The proposal is also at odds with National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural environments, and

cultural heritage, fails to establish 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 both offshore and onshore elements have not been properly evaluated, obscuring the implications for peatlands, carbon balance, habitats, and crofting land.

There remains uncertainty around environmental risks, which may be significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and contain inconsistencies. The evidential threshold required to discount adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

Additionally, the proposal would lead to substantial and irreversible alterations to a particularly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruptions to cultural and visual relationships, and detrimental impacts on tourism are permanent effects that cannot be sufficiently mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The considerable information deficiencies, alongside policy conflicts and unresolved environmental risks, obstruct a lawful, evidence-based decision. It is imperative that the competent authority refuse consent on these grounds or utilise the appropriate regulatory provisions to mandate the submission of the outstanding information.

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

Additional Comments

A crazy idea for a place with so much natural beauty and ecology - there is no reason for more turbines

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 1D7B5074

Member of the public 1061

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. The objection arises from an examination of the Environmental Impact Assessment Report and the accompanying documentation, highlighting significant deficiencies in planning, environmental, cultural, and procedural aspects. The development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, relatively unspoiled environment, and rich cultural identity. Concerns regarding the scale, proximity, and design of the project question its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application does not present a sufficient evidential basis for a lawful decision. It is marked by missing critical environmental data, limited and inconsistent baseline information, and undefined key aspects of the proposal. The employment of a flexible design framework hinders a clear understanding of potential significant effects, and the dependence on unspecified mitigation measures prevents an assessment of their efficacy. Consequently, the documentation fails to provide a comprehensive or informed view of the environmental, cultural, or community impacts, with claims of negligible or non-significant effects lacking robust evidence.

There exist pronounced and substantial conflicts with policy. The proposal seems to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not sufficiently demonstrate compliance with national mandates to safeguard biodiversity, climate interests, and environmental integrity. These discrepancies directly challenge the statutory tests required for consent and compromise the competent authority's ability to determine the development's acceptability in policy terms.

Moreover, the proposal's scale is unprecedented for this area, with large turbines located in close proximity to the shoreline, raising significant concerns about landscape capacity, visual dominance, and environmental impact. When considering the lack of adequate information, dependence on undefined mitigation, evidential shortcomings, and evident policy violations, it is clear that the application is incomplete and cannot substantiate a lawful determination. In light of these issues, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report associated with the proposal is fundamentally inadequate, lacking a comprehensive, transparent, and dependable evaluation of its potential environmental effects. The employment of a flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations for the turbines, introduces considerable uncertainty. This ambiguity hinders the consistent application of a worst-case scenario analysis, ultimately compromising the integrity of the assessment. Consequently, the impacts outlined may not accurately reflect what will be constructed, obscuring the true extent of environmental consequences from both the public and the competent authority.

Furthermore, the application places significant reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under these conditions, where environmental harm is purportedly to be addressed subsequently, obstructs any substantive evaluation of effectiveness or the assessment of residual impacts. This postponement of critical information to post-consent phases contravenes the procedural requirements of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation strategies be clearly established before any determination is made.

Moreover, there exist notable evidential shortcomings, including deficiencies in baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. Such inadequacies lead to uncertainties regarding the magnitude and significance of impacts, particularly where conclusions suggest negligible or non-significant effects without robust supporting data. The lack of comprehensive information precludes a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that is incompatible with statutory obligations.

As a result, the application does not meet the evidential threshold stipulated under the Habitats Regulations necessary to dismiss adverse effects beyond reasonable scientific doubt. This situation activates the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate adherence to National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it cannot be conclusively shown 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 clearly defined mitigation measures, and the notable gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies obstruct a lawful and rigorous evaluation of environmental effects and result in the competent authority lacking the requisite information to appropriately determine the application.

ASSESSMENT OF ALTERNATIVES

The inadequacy in assessing alternatives within the application cannot be overlooked. It does not satisfy the statutory requirements outlined by the Environmental Impact Assessment regime. Instead of offering a detailed and reasoned comparison of realistic alternatives based on their environmental effects, the application merely recounts the evolution of the project. This narrative approach fails to prove that less harmful options were thoroughly identified, evaluated, and chosen over more damaging ones.

An evident lack of transparent, evidence-based comparisons for alternative offshore locations, development scales, and design configurations is a significant concern. Specifically, the application does not show that the developer has meaningfully considered positioning the turbines further offshore, where visual, ecological, and coastal impacts might be lessened. The West Lewis coastline is particularly sensitive, and the critical role of proximity to shore in determining impact cannot be ignored. Without such analysis, one cannot conclude that the proposed location represents the least damaging option.

Further issues are present regarding the assessment of cable routing and landfall, where there is inadequate evidence demonstrating that alternative routes have been explored sufficiently to minimise the impact on sensitive receptors. This lack of consideration extends to areas of cultural and spiritual significance, such as Barvas Cemetery. The absence of a clear strategy for avoidance and the lack of comparative analysis indicate a failure to incorporate mitigation by design, relying instead on post-design mitigation measures.

Consequently, the application does not effectively illustrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This represents a breach of the established mitigation hierarchy, hindering the competent authority's ability to determine if less harmful and more suitable alternatives exist. Without a comprehensive assessment of alternatives, it is impossible to conclude that the proposal aligns with sustainability or policy compliance.

From a policy viewpoint, this shortcoming compromises adherence to National Planning Framework 4, especially concerning the protection of natural environments, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission, contributing to the overarching conclusion that the application has not undergone an adequate evaluation and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

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

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

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

These methodological shortcomings render conclusions of negligible or non-significant effects based more on assumptions than on robust evidence. Furthermore, the absence of sufficient baseline data hampers a meaningful assessment of cumulative and indirect impacts, including seasonal variation and interactions within the broader ecosystem. This creates uncertainty about the true scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. The level of uncertainty introduced precludes the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these circumstances, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents significant shortcomings regarding the protection of biodiversity, failing to meet the evidential standards necessary to ascertain that no adverse effects will occur to protected sites. The presence of contradictions within the application undermines the assessment's reliability. Notably, while the developer asserts that no significant adverse effects will arise, this claim is juxtaposed with the advancement of a Habitats Regulations derogation case, which is only warranted when significant harm is anticipated. Such inconsistencies raise serious concerns about the validity of the conclusions drawn, indicating a lack of robust support from the underlying evidence.

The application overlooks the critical importance of key foraging areas and migratory

pathways for seabird populations on the west coast of the Isle of Lewis, which are internationally recognised and currently face declining numbers. The assessment fails to adequately evaluate crucial factors such as displacement, collision risk, and habitat loss, particularly concerning seabirds tied to protected sites like the Lewis Peatlands and St Kilda. The reliance on modelling approaches raises uncertainties, especially for species experiencing severe declines, such as Kittiwakes and Fulmars. Additionally, the methodologies employed likely underestimate potential mortality rates, as they do not fully account for incomplete baseline data or the complexities of behavioural responses.

The siting of turbines within a recognised migratory corridor poses a further significant risk by creating a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor, as well as the potential impact on species with small global populations, have not been sufficiently addressed in the application.

From a regulatory standpoint, the evidence presented does not satisfy the necessary threshold to determine that protected sites' integrity will remain unaffected. The assessment's contradictory conclusions, along with data gaps and methodological limitations, indicate that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, thereby preventing a lawful conclusion that would support the granting of consent.

In summary, the ornithological assessment suffers from serious internal inconsistencies, methodological flaws, and a lack of substantial evidence, rendering it unreliable. Collectively, these deficiencies hinder an accurate evaluation of the impacts and indicate that the application does not fulfil the statutory requirements essential for determination, thereby conflicting with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline represents a living cultural landscape where environment, language, tradition, and community are intricately linked. The assessment of cultural heritage and community identity fails to recognise this connection, adopting a reductive view that treats heritage merely as a collection of static assets. It neglects to acknowledge the ongoing social, cultural, and spiritual functions these heritage sites serve within the community.

Cemeteries at Dalmore, Bragar, and Barvas are examples of culturally significant sites that are active places of burial and spiritual practice. However, the assessment inaccurately categorises them as static features, overlooking their continued use and meaning while failing to consider the impact of development on their setting. This mischaracterisation leads to an incomplete understanding of cultural effects and dismisses their importance in community life.

Additionally, the assessment does not address intangible cultural heritage, such as the

Gaelic language and local traditions, nor does it recognise the longstanding relationship between the community and the coastal environment. These elements are crucial to the area's identity but are entirely absent from the evaluation, representing a significant oversight. Without acknowledging these factors, the true cultural impact of the development remains poorly understood.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity with characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement compromises the credibility of the assessment and fails to align with established principles of participation in cultural and environmental decisions.

Moreover, the absence of a compliant Island Communities Impact Assessment, which is a statutory requirement under the Islands (Scotland) Act 2018, represents a critical procedural failure. Without this assessment, the competent authority is unable to fulfil its legal duty to evaluate the social, cultural, and economic impacts on the island community, rendering the determination of the proposal unlawful.

These shortcomings 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 and to recognise living cultural practices signifies a clear departure from policy requirements.

Ultimately, the neglect to 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 adequately evaluated, leaving the application without a sufficient basis for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal in question raises substantial concerns regarding its social impacts, health, and wellbeing. The developer has undertaken a Social Impact Assessment, which included engaging with local residents through focus groups. However, the full report remains unpublished, creating a critical evidential gap that hinders the public and relevant authorities from grasping the complete range of social risks highlighted by the developer’s own research.

Residents have reported experiencing significant stress, anxiety, and concern due to the scale and proximity of the proposed development. These observations stem from direct interactions and are therefore not based on speculation. Nevertheless, the lack of transparency in disclosing the comprehensive assessment restricts thorough examination of these findings, limiting the ability to assess their relevance in the decision-making process.

Furthermore, the proposal appears to pose a direct threat to the community’s identity

and cohesion, with “cultural loss” noted in the developer’s findings. Unfortunately, these social impacts have not been adequately incorporated into the main application or afforded the necessary consideration. The failure to publish the full Social Impact Assessment thus obscures the true human and social costs linked to the development.

This deficiency in transparency compromises the Environmental Impact Assessment process. For developments of this magnitude, a thorough understanding of social, economic, and health impacts is crucial, especially when community character and functioning are at stake. By not providing the complete dataset, the application lacks a comprehensive evidential foundation needed to weigh the benefits against potential harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Development projects should promote positive health outcomes and mitigate harm; however, existing evidence indicates adverse effects that have not been fully revealed. Without the complete assessment, demonstrating compliance with this policy becomes impossible.

The procedural ramifications are considerable. The competent authority is unable to conduct a rigorous socio-economic and health evaluation due to the unavailability of the full Social Impact Assessment. This represents a significant omission within the application and fails to satisfy the evidential standards set forth in the Environmental Impact Assessment framework.

In summary, the combination of the non-disclosure of the full Social Impact Assessment and the evidence of existing negative impacts renders the assessment incomplete and unreliable. This situation obstructs a lawful determination and reinforces the argument that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual impacts and the relationship between landscape, seascape, and cultural heritage is fundamentally flawed, failing to adequately capture the scale of change and the sensitivity of the environment. The West Lewis coastline is characterised by its open Atlantic horizon, its undeveloped nature, and a strong sense of remoteness. The proposed large-scale turbines, situated near the shoreline, would create an overwhelming industrial presence, fundamentally altering this character and leading to a permanent transformation of the landscape.

Moreover, the application does not sufficiently address the extent of the visual change. The size and closeness of the turbines would dominate views from nearby residential areas, historic sites, and popular coastal locations, thereby directly impacting visual amenity and diminishing the qualities of naturalness and remoteness. The assessment inadequately communicates the significance of this impact within the context of such a sensitive landscape.

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

Evidence indicates that these viewpoints may not fully reflect the most sensitive receptors or the worst-case scenarios, particularly concerning important cultural heritage sites and high-value landscapes. This oversight raises the possibility that the visual impacts have been underestimated, casting doubt on the reliability of the assessment.

Additionally, there is a notable failure to consider the interconnectedness of landscape, seascape, and cultural heritage. Key sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape linked by visual and spatial relationships to the Atlantic horizon. Instead of recognising their interdependence, the assessment treats these sites as isolated entities, 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 connection to the natural horizon. This constitutes not just a visual impact but a wider cultural and spatial harm that remains inadequately assessed in the application.

From a policy standpoint, the proposal contradicts National Planning Framework 4, particularly concerning the preservation of natural places and historic assets. The scale of transformation is inconsistent with the necessity to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further diminishes 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 overwhelming and inescapable. Consequently, the resultant change is fundamental and irreversible, rather than something that could be diminished to an acceptable level through mitigation efforts.

In summary, the assessment fails to accurately depict the extent of the impacts, 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 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.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The evaluation of the onshore infrastructure is fundamentally lacking, as it does not fully address the impacts associated with what constitutes a single integrated project. The interconnection between the offshore turbines and the onshore components is crucial, yet they have been assessed in isolation, leading to a disjointed understanding of the environmental and socio-economic repercussions.

The onshore aspects encompass cabling that traverses protected moorland, the construction of a substation in proximity to Stornoway, and the necessary access infrastructure through delicate landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a vital carbon reservoir and ecologically important habitat. The current application fails to deliver a thorough assessment of these impacts, which hinders the comprehension of the project's overall environmental implications.

By neglecting or postponing the evaluation of onshore effects, the application obstructs an accurate appraisal of cumulative impacts. The Environmental Impact Assessment process mandates that all elements of a project be considered collectively; however, the division of offshore and onshore components means that the combined effects on peatlands, habitats, and local communities remain inadequately examined.

There are substantial risks posed to sensitive environments, including machair systems and peatland areas that are safeguarded by policy. The application does not provide evidence that the impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented. This results in a significant gap regarding the protection of biodiversity.

Concerns also arise regarding the carbon balance associated with the proposal. Disturbance of peatland releases stored carbon, potentially leading to a carbon debt that undermines the aims of renewable energy initiatives. The application does not sufficiently tackle this matter or show that the overall carbon balance remains advantageous.

Moreover, the routing of infrastructure through operational croft land presents possible conflicts with established land use and legal rights. The application lacks evidence that the requisite consents or processes have been initiated, prompting doubts about its feasibility and lawful execution.

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

In summary, the fragmentation of project components, the absence of a comprehensive assessment, and the lack of proof concerning environmental and land use impacts render this part of the application inadequate and untrustworthy, ultimately obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife within the Environmental Impact Assessment represents a significant evidential gap. The West Lewis coastline is known for its exceptionally dark skies, which contribute to environmental quality, cultural identity, and the tourism sector. The proposal introduces permanent red aviation lighting that will be visible over extensive distances, leading to a continuous and intrusive “wall of light” effect across the western horizon, thereby fundamentally altering the night-time environment.

The application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This lack of consideration is particularly concerning given the significance of dark skies to the area’s identity and

the emerging sectors of astro-tourism. The omission of these impacts leads to a critical gap in the overall landscape and environmental assessment.

Furthermore, there is no evaluation regarding the effects of artificial lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel exhibit high sensitivity to artificial lighting due to phototaxis, which can result in disorientation and an increased risk of collision. The application does not present any lighting impact assessment or phototaxis study, thereby failing to determine how aviation lighting may influence these species or potentially increase mortality rates.

This issue is 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 risk has not been addressed. The absence of site-specific night-time data creates a substantial gap in understanding the ecological impacts.

Without an assessment of nocturnal impacts, it becomes 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 satisfied, invoking the precautionary principle and impeding a lawful determination.

From a policy perspective, this omission is at odds with National Planning Framework 4 regarding the protection of natural places and environmental quality. It further undermines the broader assessment of landscape and seascape impacts, as the character of night-time is an essential component of the environment.

In summary, the lack of assessment of 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 unable to support a lawful determination.

TOURISM

The Isle of Lewis tourism sector is vital, having grown from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. The assessment of tourism impacts related to the current application is materially deficient. It fails to evaluate the economic and social consequences for this key sector. While the application acknowledges that 86% of visitors are drawn by scenery, it does not quantify how large-scale offshore infrastructure could affect visitor numbers, behaviour, or overall economic contributions.

The assessment neglects the critical role of environmental quality in supporting tourism. Factors such as unspoiled landscapes and dark skies greatly enhance visitor

experience, particularly for emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this deficiency, leaving a significant gap in understanding the impact on a recognised and growing segment of the local economy.

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

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

Overall, the lack of a thorough evaluation of tourism impacts, the failure to consider environmental drivers of visitor behaviour, and the neglect of the island's economic dependency create a significant evidential gap. This undermines a robust evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal presents significant shortcomings in meeting the criteria for sustainable development as outlined by statutory obligations, national policy, and evidential standards. The issues identified in the application mirror those that led to the rejection of the Lewis Wind Power proposal in 2008, with concerns regarding the scale of industrialisation being deemed unacceptable. This current application is being put forward within a more robust policy framework that places greater emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

However, the application lacks a comprehensive and reliable evidential foundation for assessment. There are notable deficiencies in baseline data, reliance on an undefined design envelope, unspecified mitigation measures, and missing assessments of key impact pathways such as nocturnal wildlife, full onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment remains incomplete, hindering a thorough understanding of the likely significant effects or residual impacts.

Additionally, there are evident procedural failures. The absence of a compliant Island Communities Impact Assessment violates statutory duties under the Islands (Scotland) Act 2018, and the lack of a full Social Impact Assessment is a material oversight. These gaps impede 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 also stands in direct contradiction to National Planning Framework 4. It fails to adequately safeguard biodiversity, natural landscapes, and cultural heritage, does not demonstrate that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit owing to insufficient tourism impact modelling. Furthermore, the cumulative effects of both offshore and onshore components have not been thoroughly evaluated, obscuring impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertainties and potentially significant environmental risks remain unaddressed. The assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, contradictory. The required evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been met, thus invoking the precautionary principle and preventing a lawful conclusion that the impacts are acceptable.

Moreover, the proposal would lead to considerable and irreversible alterations to a delicate landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual connections, and the negative impact on tourism will result in permanent effects that cannot be mitigated to an acceptable extent.

In summary, the application is procedurally and substantively inadequate for determination. The multitude of information deficiencies, combined with conflicts with policy and unresolved environmental risks, precludes a lawful and evidence-based decision. The competent authority is compelled to either deny consent on these grounds or utilise the relevant regulatory provisions to demand the submission of the outstanding information.

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

Additional Comments

We live between two worlds, the other and the here.

The Hebrides is ethereal, delicate yet strong, light yet dark.

Humanity has no place between two worlds.

A fringe community, Susie fed in time yet of place.

A magical breath.

Don't break it, don't destroy it.

Preserve its iconic otherworldliness and heritage. It's whales and dolphins it's wind and birdsong.

This is no place for man and his machines, be gone.

The soul of this land is crying for protection, please say no and preserve Gods place on earth.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: D7E9499A

Member of the public 1062

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted in accordance with the relevant marine licensing and Environmental Impact Assessment frameworks. The objection is informed by a comprehensive review of the Environmental Impact Assessment Report and associated documentation, revealing significant deficiencies in planning, environmental considerations, cultural implications, and procedural compliance. The site of the proposed development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and distinct cultural identity. Concerns arise regarding the compatibility of the proposal with statutory obligations, national policies, and the overarching principles of sustainable development, particularly considering its scale, proximity to the shoreline, and design.

The application lacks an adequate evidential basis necessary for a lawful determination. Essential environmental data is absent, baseline information is both limited and inconsistent, and several critical elements of the proposal remain undefined. The flexible design framework employed obscures the potential significant effects, while the reliance on unspecified mitigation measures raises questions about their efficacy. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects are unsupported by credible evidence.

Moreover, there are evident and significant conflicts with established policies. 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 public health and wellbeing. It does not sufficiently demonstrate compliance with national obligations to protect biodiversity, climate interests, and environmental integrity. These discrepancies directly challenge the statutory tests required for consent and inhibit the competent authority from reaching a conclusion that the development is acceptable from a policy perspective.

The unprecedented scale of the proposal raises additional concerns due to the large turbines being positioned in close proximity to the shoreline, leading to significant issues regarding landscape capacity, visual impact, and overall environmental consequences. Collectively, the lack of comprehensive information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy violations indicate that the application is incomplete and fails to support a lawful determination. Under these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a comprehensive, transparent, or trustworthy account of the potential environmental effects associated with the proposal. The incorporation of a flexible Project Design Envelope, which does not commit to particular turbine dimensions, layouts, or configurations, creates substantial uncertainty and hinders the consistent application of a worst-case scenario analysis. This diminishes the reliability of the assessment, making it difficult for both the public and the competent authority to grasp the true environmental impacts that may arise from the development.

The application also places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Therefore, the request for consent is predicated on the assumption that environmental harm will be addressed at a later stage. This approach obstructs any meaningful evaluation of the potential effectiveness of such measures or the assessment of residual impacts. Deferring key information to post-consent stages is not procedurally acceptable and contradicts the fundamental aim of the Environmental Impact Assessment process, which mandates that likely significant effects and mitigation strategies must be clearly established before a determination can be made.

Further evidential deficiencies are apparent, including significant gaps in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. Such deficiencies create uncertainty surrounding the magnitude and significance of impacts, particularly in instances where conclusions of negligible or non-significant effects are asserted without robust supporting data. The lack of adequate information compromises the ability to understand cumulative and worst-case impacts and introduces scientific uncertainties that are not aligned with statutory obligations.

Consequently, the application fails to satisfy the evidential threshold stipulated under the Habitats Regulations, which is necessary to dismiss adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not illustrate adherence to National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it is unable to demonstrate that impacts have been fully evaluated or that appropriate safeguards are established.

In summary, the reliance on an ill-defined design envelope, the absence of specified mitigation measures, and the gaps in baseline data collectively render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings impede a lawful and thorough assessment of environmental effects and indicate that the competent authority cannot justifiably determine the application based on the information presented.

ASSESSMENT OF ALTERNATIVES

The proposal presents significant shortcomings in its assessment of alternatives, failing to meet the necessary standards set by the Environmental Impact Assessment regime. The application does not offer a coherent or evidence-based evaluation of realistic alternatives, neglecting to provide a structured comparison based on environmental impacts. Instead, it merely recounts the evolution of the project, which does not adequately demonstrate that less harmful options have been properly identified, assessed, and favoured over more damaging solutions.

Moreover, there is a troubling lack of transparent analysis regarding alternative offshore locations, development scales, or design configurations. The application does not convincingly establish that the developer has considered the possibility of siting turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be less severe. Given the sensitivity of the West Lewis coastline and the critical role that proximity to shore plays in determining impacts, the absence of such an analysis prevents any conclusion that the chosen siting is the least damaging option available.

This inadequacy extends to the assessment of cable routing and landfall, where there is a lack of evidence demonstrating that alternative routes have been thoroughly explored to reduce impacts on sensitive receptors, including culturally and spiritually significant sites like Barvas Cemetery. The failure to outline a clear avoidance strategy or conduct a comparative analysis suggests that the application has not adopted mitigation by design, instead relying on post-design measures that may not sufficiently address potential harm.

Consequently, the application does not sufficiently demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This failure to adhere to the established mitigation hierarchy hampers the ability of the competent authority to ascertain whether there are more suitable and less harmful alternatives. Without a thorough assessment of alternatives, it cannot be concluded that the proposal represents 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 systematic and comparative assessment is a significant omission that leads to the overall conclusion that the application has not been adequately evaluated, and thus cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species lacks comprehensiveness, failing to deliver a reliable overview of the ecological receptors in the West Lewis coastal environment. This area is characterised by its sensitivity and biological activity, yet the baseline data presented is insufficient, and the methodologies employed do not effectively capture the presence, behaviour, and habitat use of key species. Consequently, the assessment lacks a solid evidential

foundation necessary for evaluating potential impacts.

A significant shortcoming pertains to otters, classified as a European Protected Species. The application neglects to appropriately identify and assess their use of coastal regions for foraging and movement. This oversight regarding their core foraging range and behavioural patterns means that the possible impacts of construction-related disturbances, noise, and increased human activity have not been adequately analysed. As a result, this compromises any conclusions drawn about the absence of significant effects on this species.

In addition, the evaluation of basking sharks is hindered by reliance on aerial surveys, which can introduce substantial detection bias, particularly under challenging Atlantic conditions. This method is likely to lead to an underestimation of their presence, especially when compared to established land-based observations that indicate a frequent presence in these waters. The failure to integrate or properly consider such relevant data culminates in an incomplete baseline and diminishes the reliability of the conclusions reached.

The methodological shortcomings outlined lead to conclusions regarding negligible or non-significant effects being based on assumptions rather than on robust evidence. Moreover, the lack of adequate baseline data obstructs meaningful assessments of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This results in uncertainty about the actual scale of risk faced by marine species and habitats.

From a regulatory standpoint, the application does not satisfy the criteria set forth by the Environmental Impact Assessment regime and the National Planning Framework 4, as there has been an insufficient identification and assessment of protected species. This uncertainty hinders the ability to exclude adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it is clear that consent cannot be lawfully granted.

When considered collectively, the incomplete baseline data, flawed methodologies, and unsupported conclusions render the assessment unreliable. These deficiencies obstruct a thorough evaluation of the impacts on marine ecology and protected species, culminating in the conclusion that the application lacks a solid evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is significantly flawed, containing substantial gaps in evidence and inconsistencies that undermine its findings. The Isle of Lewis's west coast is home to internationally important seabird populations that are already experiencing declines. However, the application does not adequately demonstrate that these species will remain unaffected, as required by the relevant evidential standards. The turbines are sited within vital foraging areas and migratory pathways, yet the assessment fails to thoroughly evaluate potential risks, including

displacement, collision, and habitat loss.

There is a notable contradiction in the application where the developer asserts that there are no significant adverse effects, while also submitting a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises doubts about the assessment's reliability and suggests that the conclusions drawn are not substantiated by the evidence provided. Furthermore, the assessment does not convincingly show that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will be unaffected. The significance of these feeding grounds is inadequately acknowledged, and the reliance on modelling approaches adds uncertainty, particularly for species that are already in severe decline, like Kittiwakes and Fulmars. The methodologies employed may underestimate mortality rates, especially where baseline data is lacking and behavioural responses remain unclear.

The placement of turbines within a recognised migratory corridor presents an additional and serious risk, potentially obstructing a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term consequences of ongoing 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 effects 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 situation invokes the precautionary principle, preventing a lawful conclusion in favour of consent.

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

Collectively, these issues render the assessment unreliable due to internal contradictions, methodological flaws, and a lack of sufficient evidence. These shortcomings hinder a thorough evaluation of the potential impacts and lead to the overall conclusion that the application fails to satisfy the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is fundamentally inadequate, particularly in its treatment of the West Lewis coastline, which should be regarded as a living cultural landscape where environment, language, tradition, and community are interconnected. The application adopts a reductive approach, treating heritage merely as isolated, static assets instead of recognising their ongoing social, cultural, and spiritual roles within the community.

Notably, the assessment fails to properly address culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These active burial and spiritual practice locations are mischaracterised as static features, overlooking their continued use and meaning, as well as the potential impacts of development on their settings. This misrepresentation leads to an incomplete evaluation of cultural effects and neglects their importance in community life.

Moreover, the assessment lacks consideration of intangible cultural heritage, including the Gaelic language, traditions, and the deep-rooted relationship between the community and the coastal environment. These elements are integral to the area's identity but are completely omitted from the assessment, representing a significant deficiency. The failure to account for these factors prevents a proper understanding of the cultural impacts of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, which possesses a unique cultural identity akin to that of Indigenous Peoples, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the validity of the assessment and contravenes established principles of participation in matters affecting cultural and environmental interests.

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal in question raises substantial concerns regarding its social impacts, health, and wellbeing. The developer has undertaken a Social Impact Assessment, which included engaging with local residents through focus groups. However, the full report remains unpublished, creating a critical evidential gap that hinders the public and relevant authorities from grasping the complete range of social risks highlighted by

the developer's own research.

Residents have reported experiencing significant stress, anxiety, and concern due to the scale and proximity of the proposed development. These observations stem from direct interactions and are therefore not based on speculation. Nevertheless, the lack of transparency in disclosing the comprehensive assessment restricts thorough examination of these findings, limiting the ability to assess their relevance in the decision-making process.

Furthermore, the proposal appears to pose a direct threat to the community's identity and cohesion, with "cultural loss" noted in the developer's findings. Unfortunately, these social impacts have not been adequately incorporated into the main application or afforded the necessary consideration. The failure to publish the full Social Impact Assessment thus obscures the true human and social costs linked to the development.

This deficiency in transparency compromises the Environmental Impact Assessment process. For developments of this magnitude, a thorough understanding of social, economic, and health impacts is crucial, especially when community character and functioning are at stake. By not providing the complete dataset, the application lacks a comprehensive evidential foundation needed to weigh the benefits against potential harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Development projects should promote positive health outcomes and mitigate harm; however, existing evidence indicates adverse effects that have not been fully revealed. Without the complete assessment, demonstrating compliance with this policy becomes impossible.

The procedural ramifications are considerable. The competent authority is unable to conduct a rigorous socio-economic and health evaluation due to the unavailability of the full Social Impact Assessment. This represents a significant omission within the application and fails to satisfy the evidential standards set forth in the Environmental Impact Assessment framework.

In summary, the combination of the non-disclosure of the full Social Impact Assessment and the evidence of existing negative impacts renders the assessment incomplete and unreliable. This situation obstructs a lawful determination and reinforces the argument that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline, characterised by its open Atlantic horizon and undeveloped nature, conveys a strong sense of remoteness. The introduction of large-scale turbines in such close proximity to the shoreline would create a continuous industrial presence that fundamentally alters this character, resulting in a permanent and irreversible transformation of the landscape. The assessment of seascape, landscape, and visual impacts fails to adequately reflect the scale of this change and the sensitivity of the

receiving environment.

The magnitude of visual change resulting from the proposed turbines is inadequately represented in the application. Their scale and proximity would dominate views from residential areas, historic sites, and popular coastal locations, which would directly affect visual amenity and degrade the defining qualities of naturalness and remoteness. The assessment does not convey the level of impact or its significance in relation to such a sensitive landscape.

Moreover, there are concerns regarding the methodology used for selecting and presenting visual viewpoints. Evidence indicates that the chosen viewpoints may not effectively represent the most sensitive receptors or the worst-case scenarios, especially regarding key cultural heritage sites and high-value landscapes. This oversight raises the risk that the visual impact has been understated, thus compromising the reliability of the assessment.

Another critical deficiency is the failure to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Significant sites, including the Calanais Standing Stones and other Scheduled Monuments, exist within a broader landscape context linked by visual and spatial relationships to the Atlantic horizon. Treating these sites as isolated assets neglects their interdependence, resulting in an incomplete assessment of impacts on their setting and cultural significance.

The industrialisation of the seascape would sever these important connections, altering the experience of heritage assets and disrupting their relationship to the natural horizon. This not only represents a visual impact but also inflicts broader cultural and spatial harm that has not been properly considered in the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, particularly regarding the protection of natural spaces and historic assets. The scale of change presented is incompatible with the need to preserve landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the lack of a robust worst-case assessment further undermines claims 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 dominant and unavoidable. The changes they would bring about are fundamental and permanent, rather than reducible to acceptable levels through mitigation efforts.

In summary, the assessment fails to accurately capture the scale of impact, the environment's sensitivity, and the interconnected nature of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the view that the proposal is incompatible with protecting this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal presents serious deficiencies in the assessment of construction and pollution risks, which are crucial for understanding potential environmental impacts. It entails significant seabed preparation and installation activities within the dynamic Atlantic environment, yet lacks comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application relies on mitigation and contingency measures that are to be developed post-consent, thereby obstructing a thorough evaluation of their effectiveness and sufficiency.

This dependence on future, undefined measures is particularly alarming due to the sensitivity of the local environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are susceptible to disturbance and contamination from sediment. While the application acknowledges the risks associated with sediment mobilisation and possible chemical or oil spills, it fails to provide adequate information on preventative, controlling, or monitoring strategies.

There is significant uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. In the absence of rigorous modelling and clearly articulated management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also encompasses potential effects on sensitive marine species and habitats identified in the broader assessment.

Furthermore, the lack of detailed emergency response procedures intensifies these issues. By postponing contingency planning until after consent is granted, the application inhibits an evaluation of whether sufficient safeguards exist to manage pollution incidents. This presents procedural risks and compromises the capacity of the competent authority to properly assess environmental protection measures at the determination stage.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the principles set forth in the Environmental Impact Assessment regime. Significant effects and required mitigation must be thoroughly assessed prior to consent; the absence of such information renders a lawful determination unattainable. Additionally, the application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

Collectively, the lack of defined mitigation measures, insufficient management plans, and uncertainties about potential impacts render the assessment fundamentally inadequate. These shortcomings hinder a thorough evaluation of construction and pollution risks, reinforcing the assertion 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 application regarding the project is fundamentally flawed due to its incomplete assessment of onshore infrastructure, which fails to account for the interconnected

nature of the offshore turbines and onshore works. These elements should be evaluated as a cohesive unit, as their separation obscures the true magnitude of their environmental and socio-economic impacts. The onshore works involve cabling that traverses protected moorland, the construction of a substation near Stornoway, and the development of access routes through sensitive landscapes. Such activities include excavation in areas of deep peat, particularly within Barvas Moor, which is crucial both as a significant carbon store and as an ecologically sensitive habitat. The lack of a thorough assessment of these impacts hinders a complete understanding of the project's overall environmental footprint.

Additionally, by deferring or omitting the assessment of onshore impacts, the application undermines the capacity to evaluate cumulative effects adequately. The Environmental Impact Assessment process mandates that all project components be considered in conjunction, yet the current approach leads to a lack of understanding of the combined effects on peatlands, habitats, and local communities. The risks posed to sensitive habitats such as machair systems and peatland environments, which are protected by policy, remain unaddressed in the application. It does not convincingly demonstrate that thorough assessments of these habitats have been conducted or that suitable avoidance measures have been considered, revealing a significant evidential gap regarding biodiversity protection.

There are also serious concerns about carbon balance stemming from this proposal. The disturbance of peatland can release carbon that has been stored, potentially incurring a carbon debt that contradicts the fundamental goals of renewable energy initiatives. The application falls short in addressing this critical issue, failing to show that the overall carbon balance is indeed favourable.

Moreover, the routing of infrastructure through active croft land raises conflicts with existing land use and legal rights. The application provides insufficient evidence that requisite consents or processes have been initiated, which casts doubt on the project's deliverability and lawful execution.

From a policy standpoint, the lack of a holistic assessment and the failure to ensure the protection of peatlands, habitats, and land use interests are in direct conflict with the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be effectively avoided or mitigated significantly undermines the application. Overall, the disjointed treatment of project components, the absence of a comprehensive evaluation, and the insufficient evidence regarding environmental and land use impacts result in an application that is incomplete and unreliable, thus impeding a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are integral to the area's environmental quality, cultural identity, and tourism value. The proposal, however, introduces permanent red aviation lighting that would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering

the night-time environment. This change poses significant concerns for both residents and visitors, yet the application fails to assess the impact of this lighting on visual amenity, landscape character, or the overall experience in the area.

Moreover, the application does not evaluate the impacts on nocturnal wildlife, specifically species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, which are highly sensitive to artificial lighting due to phototaxis. This sensitivity can lead to disorientation and increased risk of collision. The absence of a lighting impact assessment or phototaxis study means that the potential effects of aviation lighting on these species, including possible increases in mortality, remain unexamined.

Compounding these concerns is the reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal activity or the associated risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this vulnerability has not been assessed. Without site-specific night-time data, there is a critical gap in understanding the ecological impacts of the proposal.

The lack of assessment regarding nocturnal impacts prevents a determination of whether protected species or designated sites could be adversely affected. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt has not been met, thereby engaging the precautionary principle and obstructing a lawful determination.

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

In summary, the complete lack of assessment related to dark skies and nocturnal wildlife creates a significant evidential gap. The application is rendered incomplete and insufficient to support a lawful determination due to the absence of baseline data, impact modelling, and species-specific analysis.

TOURISM

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

Tourism has experienced considerable growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and represents up to 16% of the

island's economy. However, the application does not consider how the industrialisation of the seascape and the degradation of environmental quality could affect Tourism Gross Value Added or the broader economic resilience. Without this analysis, it is impossible to ascertain whether the development would produce a net economic benefit or harm an established and growing sector.

Moreover, the assessment overlooks the role of environmental quality in promoting tourism, including how unspoiled landscapes and dark skies enhance visitor experiences and cater to emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortcoming, creating a significant gap in understanding the impacts on a recognised and expanding part of the local economy.

Given the limited economic diversification within the island community, the failure to evaluate impacts on tourism carries broader implications for employment, local businesses, and community sustainability. Additionally, the absence of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been examined as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not show adherence to National Planning Framework 4, especially concerning economic impact and the obligation to demonstrate net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector and does not furnish adequate evidence for the competent authority to assess the economic ramifications of the proposal.

In summary, the failure to quantify tourism impacts, evaluate environmental factors influencing visitor behaviour, and recognise the island's economic dependency culminates in a significant evidential gap. This undermines a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm exemplifies a significant failure to meet the standards of sustainable development as mandated by statutory duties and national policy. It mirrors the core problems that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Despite the current application being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it still falls short.

Crucially, the application lacks a comprehensive and reliable evidential basis. It contains significant gaps in baseline data, utilises an undefined design envelope, and depends on unspecified mitigation measures. Additionally, it omits vital impact pathways, including nocturnal wildlife, the full scope of onshore infrastructure, and the implications for tourism. Consequently, the Environmental Impact Assessment is insufficient, leaving the potential significant effects and residual impacts inadequately understood.

There are also evident procedural shortcomings. The failure to provide a compliant Island Communities Impact Assessment violates statutory duties under the Islands (Scotland) Act 2018, while the omission of a complete Social Impact Assessment constitutes a critical gap. These issues 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 stands in direct contradiction to National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural places, and cultural heritage, nor does it validate that health and wellbeing impacts are acceptable. Furthermore, it fails to show a net economic benefit because of the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been thoroughly evaluated, thus obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertainties persist regarding environmental risks, which could be significant. The assessments pertaining to marine ecology, seabirds, protected species, and marine mammals are incomplete and occasionally inconsistent. The evidential threshold necessary to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, which invokes the precautionary principle and prevents a lawful conclusion regarding acceptable impacts.

Moreover, the proposal threatens to cause substantial and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, loss of dark skies, and disruptions to cultural and visual relationships, alongside impacts on tourism, lead to permanent consequences that cannot be mitigated adequately.

In summary, the application is procedurally and substantively unfit for determination. The myriad information deficiencies, paired with conflicts in policy and unresolved environmental risks, obstruct any lawful and evidence-based decision-making. The competent authority must therefore refuse consent on these grounds or invoke the relevant regulatory provisions to mandate the submission of the outstanding information.

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

Additional Comments

You will directly impact the full island life, culture and wellbeing. Your plan is centered in greed and will be detrimental to one of the most attractive places in this country for tourism. Local people's voices are not being adequately listened to. You would not want this at your own front door so why on earth should you spoil our Island.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 45F63C22

Member of the public 1063

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 proposal lacks a comprehensive and reliable Environmental Impact Assessment Report, which fails to adequately detail the potential environmental effects associated with the development. A flexible Project Design Envelope is utilised without clear commitments to specific turbine dimensions, layouts, or configurations. This introduces significant uncertainty and hinders the ability to apply a consistent worst-case scenario, ultimately undermining the integrity of the assessment. As a result, the impacts described may not accurately reflect the actual development, thereby obstructing both public and competent authority understanding of the true environmental effects.

Furthermore, the application is overly reliant on mitigation measures, monitoring strategies, and management plans that are not yet defined. This means that consent is sought on the assumption that any environmental harm will be managed at a later stage, which hampers meaningful evaluation of the effectiveness of these measures or assessment of any residual impacts. Such deferral of essential 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 clearly established before determination.

There are also serious evidential gaps, including deficiencies in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This creates uncertainty about the scale and significance of impacts, especially in cases where conclusions of negligible or non-significant effects are made without robust supporting data. The lack of adequate information prevents a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot align with statutory requirements.

Consequently, the application does not satisfy the evidential threshold established under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially regarding protected species and sensitive habitats. The proposal also fails to comply with National Planning Framework 4, particularly in aspects related to biodiversity protection and environmental integrity, as it cannot be demonstrated that impacts have been thoroughly assessed or that suitable safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The evaluation of alternatives within the application is fundamentally deficient and fails to satisfy the legal obligations of the Environmental Impact Assessment framework. Instead of offering a structured and reasoned analysis of viable alternatives grounded in environmental consequences, the documentation merely recounts the evolution of the

project. This narrative fails to adequately demonstrate that less harmful options have been thoroughly identified, evaluated, and chosen over more detrimental solutions.

Furthermore, there is a lack of transparent, evidence-based comparisons concerning alternative offshore sites, development sizes, or design layouts. Notably, the application does not indicate that the developer has genuinely considered placing turbines further offshore, a move that would likely mitigate visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline, coupled with the critical relevance of proximity to the shore in assessing impact, necessitates such an analysis; its absence undermines any assertion that the proposed siting constitutes the least damaging option.

This inadequacy is also reflected in the assessment of cable routing and landfall, where there is a failure to provide sufficient evidence that alternative routes have been meaningfully investigated to avoid or lessen impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The lack of a coherent avoidance strategy and the absence of comparative analysis indicate that mitigation by design has not been adequately considered, relying instead on measures to be implemented after the design phase.

Consequently, the application does not convincingly demonstrate that environmental harm has been minimised through considerations of site selection, layout, and infrastructure routing. This represents a breach of the established mitigation hierarchy and hinders the competent authority's ability to ascertain whether more suitable and less harmful alternatives exist. Without a comprehensive assessment of alternatives, it cannot be established that the proposal aligns with sustainable or policy-compliant standards.

From a policy standpoint, this inadequacy jeopardises adherence to National Planning Framework 4, particularly concerning the safeguarding of natural environments, cultural heritage, and community wellbeing. The absence of a structured and comparative evaluation is a significant oversight that leads to the overall conclusion that the application has not been properly evaluated and cannot support a lawful decision.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is significantly inadequate, failing to offer a complete or reliable understanding of the ecological receptors present. This area is characterised as a biologically active and highly sensitive marine system, yet the baseline data collected is insufficient, and the methodologies employed do not effectively capture species presence, behaviour, and habitat utilisation. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

A notable shortcoming is the treatment of otters, which are classified as a European Protected Species. The application does not adequately acknowledge or evaluate their

active use of coastal zones for foraging and movement. The failure to consider their core foraging range and behavioural patterns leads to an incomplete assessment of the possible effects of construction disturbance, noise, and heightened activity, thereby undermining any conclusions that suggest no significant effects on this species.

In addition, the evaluation of basking sharks is flawed, as it relies on aerial surveys that introduce significant detection bias, especially under Atlantic weather conditions. This methodology is prone to underestimating the presence of basking sharks, particularly when compared to established land-based observations that indicate their frequent usage of these waters. The neglect to incorporate or appropriately consider such data results in an incomplete baseline, further diminishing the reliability of the conclusions drawn.

The methodological shortcomings lead to conclusions regarding negligible or non-significant effects that rest on assumptions rather than substantial evidence. The lack of adequate baseline data also obstructs meaningful assessments of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation generates uncertainty concerning the true extent of risk posed to marine species and their habitats.

From a regulatory standpoint, the application does not satisfy the Environmental Impact Assessment requirements or those of National Planning Framework 4, as there has been insufficient identification or evaluation of protected species. The uncertainty introduced by these deficiencies means that adverse effects cannot be excluded beyond reasonable scientific doubt, thus necessitating the precautionary principle. Under these conditions, consent cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unfounded conclusions renders the assessment unreliable. These issues inhibit a thorough evaluation of impacts on marine ecology and protected species, supporting the overall assertion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

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

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

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

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

From a regulatory standpoint, the application does not satisfy the evidential requirements needed to affirm no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and limitations in modelling, indicate that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, making it impossible to lawfully conclude in favour of consent.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of community identity and cultural heritage is fundamentally insufficient and fails to recognise the West Lewis coastline as a dynamic cultural landscape where language, tradition, environment, and community are intrinsically linked. The approach taken in the application is overly simplistic, viewing heritage merely as isolated, static assets instead of acknowledging 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 locations serve as active burial grounds and spaces for spiritual practice, yet the assessment mischaracterises them as static features. This oversight disregards their continued use and significance, as well as the impact of development on their settings. Consequently, the evaluation of cultural effects is incomplete and overlooks their importance in community life.

Furthermore, the application neglects intangible cultural heritage, including the Gaelic language, traditions, and the enduring connection between the community and the coastal environment. These aspects are vital to the area's identity, yet they are entirely missing from the assessment, representing a considerable omission. The cultural impact of the development cannot be adequately grasped without considering these elements.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, which embodies a distinct cultural identity and recognised characteristics of Indigenous Peoples, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the credibility of the assessment and fails to uphold established principles of participation in decisions that affect cultural and environmental interests.

A critical procedural failure is the lack of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligations to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders a lawful determination impossible.

From a policy standpoint, these deficiencies conflict directly with the National Planning Framework 4, especially regarding the protection of historic assets and places. The failure to consider both tangible and intangible heritage, alongside the recognition of living cultural practices, constitutes a clear deviation from policy requirements.

In summary, the neglect to assess living heritage, intangible cultural value, community rights, and statutory duties results in a significant evidential gap. The cultural impacts of the proposed development have not been thoroughly evaluated, and the application fails to present a robust foundation for understanding the true cultural cost associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development raises serious concerns regarding social impacts, health, and wellbeing due to the lack of transparency in its assessment. Although a Social Impact Assessment was commissioned by the developer, including focus groups with local residents, the complete report remains unpublished. This absence of information creates a substantial evidential gap, obstructing both public understanding and the competent authority's evaluation of social risks identified by the developer's research.

Available summaries reveal that residents are currently facing measurable stress, anxiety, and concern stemming from the scale and proximity of the proposal. These impacts have been derived from direct engagement and should not be regarded as speculative. However, the lack of disclosure concerning the full assessment hinders adequate scrutiny of these findings and restricts the determination of their significance during the decision-making process.

Moreover, there are indications that the proposal poses a direct threat to community identity and cohesion, with “cultural loss” noted in the developer’s findings. Nevertheless, these impacts have not been properly considered in the main application nor given the appropriate weight they deserve. The decision to withhold the full Social Impact Assessment obscures the real human and social costs associated with the development.

This deficiency in transparency undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health impacts is crucial for developments of this magnitude, particularly when community character and functioning may be jeopardised. The failure to provide the complete dataset means the application does not present a thorough evidential basis for evaluating the balance between benefits and harm.

From a policy standpoint, the application does not illustrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments should promote positive health outcomes and avoid adverse effects; however, the evidence available indicates existing negative impacts that remain undisclosed. Without access to the full assessment, compliance with this policy cannot be substantiated.

The implications of these procedural shortcomings are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This omission represents a material flaw within the application and signifies a failure to meet the evidential standards set forth by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing adverse effects, renders the assessment incomplete and untrustworthy. This situation hampers lawful determination and reinforces the conclusion that the application is unsupported by adequate information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

to such a sensitive landscape.

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

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

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

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

It is evident that the impacts identified are beyond effective mitigation. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. Consequently, the resulting change is fundamental and permanent, not something that can be reduced to an acceptable level through mitigation measures.

In summary, the assessment does not accurately reflect the scale of impact, the sensitivity of the environment, or the interconnectedness of landscape and heritage. These shortcomings obstruct a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal presents an incomplete assessment of construction and pollution risks, lacking the detail necessary to evaluate potential environmental effects. It entails extensive seabed preparation and installation works in a high-energy Atlantic environment but does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that are to be formulated after consent is

granted, which hampers a meaningful assessment of their adequacy and effectiveness.

This reliance on unspecified future measures raises significant concerns, particularly given 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 does acknowledge risks such as sediment mobilisation and accidental spills of chemicals or oil, it fails to provide sufficient detail on how these risks will be prevented, controlled, or monitored.

There is also a lack of clarity regarding the scale and behaviour of sediment plumes that may arise from the 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 also encompasses potential effects on marine species and habitats, which have already been identified as sensitive in the broader assessment.

Furthermore, the absence of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application obstructs the evaluation of whether appropriate safeguards are in place to address pollution incidents. This deferral introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures at the determination stage.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. It is necessary to assess likely significant effects and mitigation before granting consent, and the absence of this information means a lawful determination cannot be achieved. The application also fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the lack of defined mitigation measures, inadequate management plans, and uncertainty about potential impacts make the assessment materially deficient. These deficiencies hinder a thorough evaluation of construction and pollution risks, further supporting the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The evaluation of the application is fundamentally inadequate, particularly concerning the impacts on marine life and the local fishing industry. The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the application fails to adequately ensure that these essential habitats and industries will be protected from significant disruption.

A major concern is the erroneous assumption that fishing activities can be displaced without repercussions. The application does not provide any evidence to suggest that alternative fishing grounds exist or are capable of accommodating the displaced activities without incurring additional pressures. This lack of information is critical, as

such displacement could lead to overfishing in other areas, thereby threatening the livelihoods of local fishers and the local economy. Without a thorough, evidence-based assessment, the effects on fisheries and the communities reliant on them remain poorly understood.

Additionally, the proposal poses notable threats to marine species, particularly due to the underwater noise associated with construction activities. The anticipated use of high-energy hammer piling for extended periods is likely to cause widespread disturbance, particularly affecting species such as dolphins. The potential impact on a significant portion of the local bottlenose dolphin population is of considerable concern, yet the application minimises these risks without sufficient evidence to support its conclusions.

There is also an evident contradiction within the application, where the necessity for licences to permit harm to European Protected Species is acknowledged, while simultaneously classifying the impacts as negligible. This inconsistency undermines the overall credibility of the assessment and raises serious questions about adherence to the Habitats Regulations, especially when harm is indicated to a degree that would require legal permissions.

Furthermore, the assessment neglects to address cumulative impacts resulting from various pressures, including habitat disruption, noise pollution, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is essential to determine the overall consequences for marine ecosystems and local socio-economic conditions.

From a policy perspective, the application does not demonstrate compliance with National Planning Framework 4 or the National Marine Plan. It fails to illustrate that the development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, which precludes any assertion that the proposal embodies sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The project involves significant onshore infrastructure, which has been inadequately assessed, leading to an incomplete understanding of the impacts associated with what constitutes a single integrated project. The offshore turbines and onshore works are closely interrelated; however, their separate assessments create a disjointed approach that fails to capture the full scale of environmental and socio-economic effects.

Onshore components include cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through

sensitive landscapes. These activities necessitate excavation in areas of deep peat, particularly within Barvas Moor, a vital carbon store and ecologically important habitat. The application does not provide a thorough assessment of these impacts, which hinders a complete understanding of the project's overall environmental footprint.

By omitting or delaying the evaluation of onshore impacts, the application obstructs a proper assessment of cumulative effects. The Environmental Impact Assessment process mandates that all elements of a project be evaluated collectively, yet the distinct separation of offshore and onshore components means the overall effects on peatlands, habitats, and communities remain unclear.

There are notable risks to sensitive habitats, including machair systems and peatland environments that receive policy protection. The application fails to illustrate that impacts on these habitats have been fully appraised or that suitable avoidance measures have been enacted, thus creating a significant evidential gap in terms of biodiversity protection.

Concerns are also raised regarding the project's carbon balance. Disturbance of peatland has the potential to release stored carbon, thereby creating a carbon debt that contradicts renewable energy development objectives. The application does not sufficiently address this concern or demonstrate that the overall carbon balance is advantageous.

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

From a policy standpoint, the failure to evaluate the project as a cohesive entity and to show adequate protection for peatlands, habitats, and land use interests contradicts the National Marine Plan and National Planning Framework 4. The inability to prove that impacts can be avoided or mitigated further weakens the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment fails to address the important aspects of dark skies and nocturnal wildlife, resulting in a significant omission. The West Lewis coastline is known for its exceptionally dark skies, which contribute to environmental quality, cultural identity, and tourism. The proposed development would introduce permanent red aviation lighting that could be seen from long distances, creating an intrusive "wall of light" effect across the western horizon. This change would fundamentally disrupt the night-time environment.

The application lacks any evaluation of how this lighting would affect visual amenity, landscape character, or the experience of both residents and visitors. This is particularly critical as dark skies are vital to the area's identity and are increasingly significant for tourism sectors like astro-tourism. The absence of this analysis creates a notable gap in the overall assessment of the landscape and environmental impact.

Furthermore, the application does not consider the potential effects on nocturnal wildlife. Species such as 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. There is no lighting impact assessment or phototaxis study included, meaning the potential effects of aviation lighting on these species remain unexamined, which could lead to increased mortality rates.

This lack of evaluation is exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to capture the nocturnal behaviours and related risks. Species such as Kittiwakes, known to forage or migrate at night, are also at risk of disorientation from artificial light, yet this has not been adequately assessed. Without site-specific data collected during night-time, there is a significant gap in understanding the ecological impacts involved.

Without a thorough assessment of nocturnal effects, it is impossible to ascertain if protected species or designated sites would face adverse impacts. The evidential standard required to rule out negative effects beyond reasonable scientific doubt is not met, which invokes the precautionary principle and inhibits a lawful determination.

From a policy standpoint, the lack of assessment contradicts National Planning Framework 4, which focuses on the protection of natural places and maintaining environmental quality. It also affects the overall landscape and seascape evaluations, as the character of the night-time environment is a crucial element of the ecosystem.

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

TOURISM

The evaluation of tourism impacts lacks depth and does not address the economic and social effects on a vital sector of the Isle of Lewis economy. The area's tourism depends heavily on its wild coastline, nearly untouched landscapes, dark skies, and sense of remoteness. While the application notes that 86% of visitors are attracted by the scenery, it fails to provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution.

Tourism has seen considerable growth, rising from £65 million in 2017 to over £81.5

million, creating more than 1,000 jobs and accounting for up to 16% of the island's economy. Nevertheless, the application does not evaluate how the industrialisation of the seascape and the decline in environmental quality would affect Tourism Gross Value Added or the broader economic resilience. Without such analysis, it is impossible to ascertain whether the development would provide a net economic benefit or jeopardise a well-established and growing sector.

Additionally, the assessment neglects to consider the role of environmental quality in supporting tourism. The significance of unspoiled landscapes and dark skies to visitor experience and emerging markets like nature-based tourism and astro-tourism has been overlooked. The lack of a Dark Skies Assessment exacerbates this issue, creating a major gap in understanding the effects on a recognised and expanding part of the local economy.

For an island community with limited economic diversity, the failure to evaluate tourism impacts has broader implications for employment, local businesses, and community sustainability. The absence of a proper Island Communities Impact Assessment means that these economic vulnerabilities have not been reviewed as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, especially regarding economic impact and the necessity to show net benefits. It also contradicts strategic objectives that classify tourism as a priority growth sector and fails to provide adequate evidence for the competent authority to evaluate the economic ramifications of the proposal.

In summary, the inability to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and recognise the island's economic dependency leads to a significant evidential gap. This deficiency hinders a thorough assessment of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal represents a profound failure to fulfil the requirements of sustainable development as defined by statutory duties, national policy, and evidential standards. The issues that led to the refusal of the Lewis Wind Power proposal in 2008 are echoed in this application, which has been presented under a stronger policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

A complete and reliable evidential basis for determination is lacking in the application. There are significant gaps in baseline data, alongside the ongoing use of an undefined design envelope. The reliance on unspecified mitigation measures and the exclusion of crucial impact pathways, including nocturnal wildlife, onshore infrastructure, and tourism effects, render the Environmental Impact Assessment incomplete. This deficiency hinders a comprehensive understanding of the likely significant effects or residual impacts.

Moreover, procedural failures are evident. The lack of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018, while the failure to disclose a complete Social Impact Assessment is a material omission. These shortcomings impede the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable 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 provide assurance 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 impact of offshore and onshore elements has not been thoroughly assessed, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

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

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

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: B071F777

Member of the public 1064

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under the marine licensing and Environmental Impact Assessment frameworks. A thorough review of the Environmental Impact Assessment Report and accompanying documents reveals significant deficiencies in planning, environmental management, cultural considerations, and procedural compliance. Situated off the west side of the Isle of Lewis, this region is characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. The scale, proximity, and design of the proposed development raise essential concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a solid evidential basis necessary for a lawful determination. There is a notable absence of critical environmental data, while the available baseline information is both limited and inconsistent. Furthermore, many key components of the proposal remain undefined. The flexible design framework impedes a clear assessment of potential significant effects, and the reliance on unspecified mitigation measures prevents any meaningful evaluation of their effectiveness. Consequently, the documentation fails to facilitate a comprehensive understanding of the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by robust evidence.

Moreover, there are significant policy conflicts evident in the proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests necessary for consent and undermine the ability of the competent authority to determine the development's acceptability in policy terms.

The scale of the project is unprecedented for this area, with large turbines positioned alarmingly close to the shoreline. This introduces considerable concerns about landscape capacity, visual dominance, and overall environmental impact. Together, the lack of adequate information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance highlight that the application is incomplete and incapable of supporting a lawful determination. Under these circumstances, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and transparency, failing to provide a reliable account of the potential environmental effects associated with the proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations for the turbines, creates considerable uncertainty. This approach hinders the consistent application of a worst-case scenario, undermining the assessment's integrity and obscuring the true extent of environmental impacts. As a result, both the public and the competent authority are left without a clear understanding of the potential consequences of the development.

Moreover, the application places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent on the premise that environmental harm will be managed later raises procedural concerns, as it prevents a thorough evaluation of the proposed measures' effectiveness or an assessment of residual impacts. This postponement of crucial information until after consent is granted is unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which demands that significant effects and mitigation strategies are clearly established before determination.

The report is also characterised by significant evidential weaknesses, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. Such deficiencies generate uncertainty regarding the scale and significance of the impacts, particularly where conclusions of negligible or non-significant effects are made without adequate supporting data. The lack of sufficient information obscures the understanding of cumulative and worst-case impacts, introducing scientific uncertainty that fails to align with statutory requirements.

Consequently, the application does not meet the evidential threshold mandated under the Habitats Regulations, which is necessary to rule out adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, which includes stipulations related to biodiversity protection and environmental integrity. It cannot be established that impacts have been comprehensively assessed or that appropriate safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specified mitigation measures, and significant gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These issues preclude a lawful and thorough evaluation of environmental effects and prevent the competent authority from making an informed decision based on the information provided.

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 lacks reliability, marked by significant internal inconsistencies and methodological weaknesses that undermine its findings. The west coast of the Isle of Lewis is home to internationally important seabird populations that are already experiencing decline. Despite this, the application does not adequately demonstrate that these species will not be adversely affected. Key foraging areas and migratory pathways are situated within the development zone, yet the assessment fails to thoroughly evaluate the risks associated with displacement, collision, or habitat

loss.

A critical contradiction arises within the application, where the developer asserts there will be no significant adverse effects while simultaneously submitting a Habitats Regulations derogation case, an indication that significant harm is anticipated. This inconsistency raises serious doubts about the credibility of the assessment and suggests that the conclusions are unsupported by the available evidence.

The assessment falls short in demonstrating that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will not be impacted. Furthermore, the significance of these vital feeding grounds is inadequately considered. The reliance on modelling approaches introduces a level of uncertainty, especially for vulnerable species such as Kittiwakes and Fulmars, with the methodologies likely to underestimate potential mortality given the incomplete baseline data and insufficient understanding of behavioural responses.

The positioning of turbines within a recognised migratory corridor poses an additional substantial risk by effectively creating a barrier in a key flight path utilised by species migrating between the United Kingdom and Iceland. The long-term consequences of ongoing mortality within this corridor are not sufficiently assessed, nor are the implications for species with relatively small global populations.

From a regulatory standpoint, the application does not fulfil the necessary evidential threshold to conclude there is no adverse effect on the integrity of protected sites. The presence of contradictory findings, alongside gaps in data and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and obstructs a lawful conclusion in favour of consent.

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

Overall, these inadequacies render the assessment untrustworthy and compromise the ability to evaluate impacts thoroughly, leading to the conclusion that the application does not satisfy the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is a living cultural landscape, where environment, language, tradition, and community are intrinsically connected. However, the assessment of cultural heritage and community identity is fundamentally inadequate, adopting a reductive approach that treats heritage as a series of isolated, static assets. This failure to acknowledge the ongoing social, cultural, and spiritual functions of these elements within the community is a critical oversight.

Culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas represent active places of burial and spiritual practice. Yet, the assessment inaccurately categorises them as static features, neglecting their continued use, meaning, and the potential impact of development on their setting. This mischaracterisation leads to an incomplete evaluation of cultural effects, disregarding their essential role in community life.

Moreover, the assessment does not 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 area's identity but are entirely absent from the assessment, marking a significant omission that prevents a proper understanding of the cultural impact of the development.

Community rights and engagement further exacerbate the situation. The Gaelic-speaking population possesses a distinct cultural identity with recognised characteristics of an Indigenous People, 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 adhere to established principles of participation regarding decisions that affect cultural and environmental interests.

A critical procedural failure lies in the absence of a compliant Island Communities Impact Assessment, which is a statutory requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot fulfil its legal duty to evaluate the social, cultural, and economic impacts on the island community, which is a significant omission that prevents 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, and to recognise living cultural practices, clearly departs from policy requirements.

Collectively, the failure to 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 properly assessed, and the application does not provide a sufficient basis for evaluating the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The full report of the Social Impact Assessment commissioned by the developer has not been published, creating a significant evidential gap. This lack of transparency denies both the public and the competent authority the ability to fully comprehend the social risks identified through the developer’s own research. Available summaries highlight that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement and are therefore not speculative, yet the failure to disclose the complete assessment hinders proper scrutiny and limits understanding of their significance in the decision-making process.

Furthermore, there is evidence indicating that the proposal is seen as a direct threat to community identity and cohesion. The developer's findings identify “cultural loss,” but these impacts have not been adequately integrated into the main application or given appropriate consideration. This withholding of the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

The implications of this lack of transparency extend to the Environmental Impact Assessment process itself. A comprehensive understanding of the social, economic, and health impacts is crucial for developments of this scale, particularly when community character and functioning are at stake. The application does not provide the complete dataset necessary for a thorough assessment of the balance between benefits and harm.

From a policy standpoint, the application fails to demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Development projects must promote positive health outcomes and avoid harm, yet the evidence available points to existing adverse effects that have not been fully revealed. Without the complete assessment, there is no way to confirm compliance with this policy.

The procedural ramifications are considerable, as the competent authority cannot perform a robust socio-economic and health evaluation without access to the full Social Impact Assessment. This omission represents a material failure within the application and does not satisfy the evidential requirements set out by the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, 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.

CONSTRUCTION AND POLLUTION RISKS

The evaluation of the proposal is materially deficient due to the lack of detail concerning construction and pollution risks. There are substantial seabed preparation and installation works planned within a high-energy Atlantic environment; however, the application does not present fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are to be prepared after consent is granted, which obstructs any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures raises serious concerns, particularly in light of the sensitivity of the environment in question. The West Lewis coastline is home to clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks associated with sediment mobilisation and potential chemical or oil spills, it fails to provide adequate detail on preventive, control, or monitoring measures.

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 is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty extends to the potential effects on marine species and habitats previously identified as sensitive in the broader assessment.

Moreover, the absence of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning until after consent, the application undermines the competent authority's ability to evaluate whether appropriate safeguards exist for addressing pollution events. This introduces procedural risks and compromises the assessment of environmental protection measures at the point of determination.

From a regulatory standpoint, deferring critical environmental safeguards contradicts the requirements outlined in the Environmental Impact Assessment regime. Significant effects and their mitigation must be assessed prior to granting consent, and the absence of such information renders a lawful determination unattainable. Furthermore, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

Overall, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts collectively indicate that the assessment is severely deficient. These issues 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 shortcomings regarding the assessment of fisheries and marine life, failing to provide a thorough evaluation of ecological or socio-economic impacts. Off the West Lewis coast, the waters are home to a rich marine ecosystem and a thriving fishing industry. However, the application does not convincingly demonstrate that these vital resources can be preserved or maintained without considerable disruption.

A critical concern is the premise that fishing activities can be displaced without repercussions. The application lacks evidence to support the availability, accessibility, or capacity of alternative fishing grounds to accommodate the additional strain. This significant gap raises the risk of overfishing in other areas, which could have broader

economic ramifications for the local fishing fleet. Without a clear, evidence-based evaluation, the potential impacts on fisheries and local livelihoods remain poorly understood.

Furthermore, the proposal poses serious risks to marine species, primarily due to the underwater noise produced during construction. The expected high-energy hammer piling over an extended duration is likely to disturb marine life over large areas, impacting species such as dolphins. The anticipated disturbance to a considerable portion of the local bottlenose dolphin population is alarming; nonetheless, the application downplays these effects without providing adequate supporting evidence.

There exists a troubling inconsistency within the application regarding the acknowledgment of the need for licenses to permit harm to European Protected Species, while simultaneously describing these impacts as negligible. This contradiction undermines the credibility of the assessment and raises concerns about compliance with the Habitats Regulations, particularly in situations where anticipated harm necessitates legal authorisation.

Additionally, the assessment overlooks cumulative impacts from various pressures, including habitat disruption, noise pollution, and the displacement of fishing activities. A comprehensive 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 adherence to the National Planning Framework 4 or the National Marine Plan. It does not establish that the development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, which obstructs the conclusion that this proposal embodies sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is fundamentally inadequate, failing to consider the full range of impacts stemming from what constitutes a single integrated project. The offshore turbines and the onshore works are interconnected; however, they are assessed in isolation, leading to a fragmented analysis that masks the actual extent of environmental and socio-economic consequences.

Onshore elements encompass cabling that traverses protected moorland, the construction of a substation in proximity to Stornoway, and the necessary access infrastructure that runs through sensitive landscapes. This construction involves excavation in areas of deep peat, particularly within Barvas Moor, which is an important carbon store and an ecologically delicate habitat. The application lacks a thorough

assessment of these impacts, which obstructs a comprehensive understanding of the project's total environmental footprint.

By omitting or postponing the evaluation of onshore impacts, the application fails to allow for a proper examination of cumulative effects. The Environmental Impact Assessment process stipulates that all components of a project must be assessed collectively; the division between offshore and onshore aspects results in an insufficient understanding of the combined impacts on peatlands, habitats, and local communities.

There are notable risks posed to sensitive habitats, including machair systems and peatland environments, both of which are subject to policy protection. The application does not sufficiently demonstrate that the impacts on these habitats have been fully evaluated or that appropriate avoidance strategies have been enacted. This absence highlights a significant evidential gap concerning biodiversity protection.

Concerns regarding carbon balance are also raised by the proposal. Disturbance of peatland can lead to the release of stored carbon, potentially generating a carbon debt that undermines the objectives of renewable energy initiatives. The application fails to adequately address this matter or to show that the overall carbon balance remains advantageous.

Moreover, routing infrastructure through active croft land may lead to conflicts with existing land use and legal rights. The application provides no evidence that the requisite consents or processes have been started, which brings into question the project's deliverability and lawful execution.

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

In summary, the separation of project components, the absence of a comprehensive assessment, and the lack of substantiation regarding environmental and land use impacts render this aspect of the application incomplete and untrustworthy, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment fails to include any evaluation of dark skies and nocturnal wildlife, which is a significant oversight. The West Lewis coastline is known for its exceptionally dark skies, which contribute to the area’s environmental quality, cultural identity, and tourism value. The proposal introduces permanent red aviation lighting that would create a continuous and intrusive “wall of light” effect across the western horizon, fundamentally changing the night-time environment.

There has been no assessment of the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This gap is particularly concerning given the importance of dark skies for the area's identity and for emerging sectors such as astro-tourism. The lack of consideration for these impacts indicates a clear shortfall in the overall landscape and environmental evaluation.

Moreover, the application does not include any assessment of the impacts on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly susceptible to artificial lighting, which can cause disorientation and increase the risk of collision. The absence of a lighting impact assessment or phototaxis study means that the potential effects on these species and their mortality rates remain unexamined.

This issue is exacerbated by the dependence on daytime survey data in the ornithological assessment, which fails to account for nocturnal activity and related risks. Other 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 addressed. The lack of site-specific night-time data creates a serious shortcoming 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 evidential standard required to exclude adverse effects beyond reasonable scientific doubt cannot be satisfied, thus invoking the precautionary principle and preventing a lawful decision.

From a policy standpoint, this omission contradicts National Planning Framework 4, which pertains to the protection of natural places and environmental quality. Additionally, it undermines the overall evaluation of landscape and seascape impacts, as the character of night-time environments is a vital component of the ecological setting.

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

TOURISM

The assessment of tourism impacts presents significant deficiencies, failing to evaluate the economic and social implications for a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. The application notes that 86% of visitors are attracted by the scenery, yet it does not provide any quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or overall economic contribution.

Tourism on the Isle of Lewis has experienced considerable growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and represents up to 16% of the island's economy. Nevertheless, the application neglects to model how the potential industrialisation of the seascape and deterioration of environmental quality could impact Tourism Gross Value Added or the broader economic resilience of the island. The lack of such analysis raises concerns about whether the proposed development would yield a net economic benefit or detract from an established and thriving sector.

Furthermore, the assessment does not adequately consider the vital role of environmental quality in attracting tourists, overlooking the significance of unspoiled landscapes and dark skies for visitor experiences and emerging markets like nature-based tourism and astro-tourism. The omission of a Dark Skies Assessment exacerbates this oversight, resulting in a substantial gap in understanding the impacts on a growing segment of the local economy. In a community with limited economic diversification, the failure to assess tourism impacts poses broader risks to employment, local businesses, and the sustainability of the community. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities remain unaddressed, as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, particularly concerning economic impact and the need to illustrate a net benefit. It contradicts strategic objectives that prioritise tourism as a growth sector and fails to provide adequate evidence for the competent authority to evaluate the economic consequences of the proposal. Overall, the lack of quantified tourism impacts, the inadequate assessment of environmental influences on visitor behaviour, and the disregard for the island's economic dependence culminate in a significant evidential gap. This hinders 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 represents a significant shortfall in meeting the criteria for sustainable development as mandated by statutory responsibilities, national policy, and evidential standards. It echoes the key issues that resulted in the denial of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. This current application, however, is being considered under a more robust policy framework that emphasises the importance of biodiversity, peatland preservation, landscape integrity, and community wellbeing.

There is a lack of a comprehensive and reliable evidential foundation for this application. Notably, there are substantial deficiencies in baseline data, the continued use of an undefined design envelope, reliance on unspecified mitigation measures, and critical omissions regarding impact pathways, which include nocturnal wildlife, complete onshore infrastructure, and effects on tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a full understanding of likely significant effects or residual impacts.

Procedural inadequacies are evident 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 present the complete Social Impact Assessment represents a significant omission. These shortcomings inhibit the competent authority from properly evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Furthermore, the proposal is at odds with National Planning Framework 4. It does not adequately demonstrate protection for biodiversity, natural landscapes, and cultural heritage. There is insufficient evidence to support that health and wellbeing impacts are acceptable, nor is there demonstrable net economic benefit due to the lack of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been adequately assessed, leading to obscured impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also internally inconsistent in certain aspects. The evidential threshold required 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.

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

In summary, this application is procedurally and substantively unfit for determination. The plethora of information deficiencies, in conjunction with policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority is compelled to either refuse consent on these grounds or invoke the appropriate regulatory provisions to necessitate the submission of the required missing information.

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

Additional Comments

As a resident of the West Coast of Lewis I have been staggered that this prposal has ever even been considered.

There are so many negatives about this propoal not only on a human scale but a massive environmental disaster for wildlife, air pollution, noise pollution and detrimental to migrating birds, whales, dolphins and habitats that use our unique

landacape to nest and multiply, ocean currents and sealife habitats.

This proposal is beyond devastating and should in no circumstances be allowed to proceed.

Outlined in this email are the clear reasons why this proposal should be rejected.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: EB1B7658

Member of the public 1065

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

Dear Sir/Madam

This objection is a formal stance against the Spiorad na Mara Offshore Wind Farm application, which has been submitted under marine licensing and Environmental Impact Assessment protocols. It arises from an analysis of the Environmental Impact Assessment Report and accompanying documents, highlighting numerous deficiencies across planning, environmental, cultural, and procedural aspects. Situated off the west side of the Isle of Lewis, an area notable for its Atlantic-facing coastline and strong cultural identity, the proposed development raises serious concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

Fundamentally, the application is deficient in evidential support necessary for lawful determination. There is a significant lack of critical environmental data, with baseline information being both limited and inconsistent. Moreover, essential elements of the proposal are inadequately defined. The flexible design framework used undermines the ability to assess likely significant effects, while the unspecified mitigation measures render any evaluation of their effectiveness impossible. Consequently, the documentation fails to provide a comprehensive understanding of the potential environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects lack robust evidential backing.

There are notable policy conflicts that raise alarm. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not satisfactorily demonstrate compliance with national requirements aimed at safeguarding biodiversity, climate interests, and environmental integrity. Such discrepancies undermine the statutory tests necessary for consent and compromise the competent authority's ability to ascertain the proposal's acceptability from a policy perspective.

The unprecedented scale of this proposal, with large turbines placed in close proximity to the shoreline, exacerbates concerns about landscape capacity, visual dominance, and environmental impact. Taken together, the lack of sufficient information, dependence on undefined mitigation, evidential weaknesses, and clear non-compliance with policy all indicate that the application is incomplete and unfit for lawful determination. In light of these factors, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies, failing to deliver a complete, transparent, and dependable analysis of the potential environmental effects of the proposed development. A major concern is the use of a flexible Project Design Envelope, which lacks commitment to precise turbine sizes, layouts, or configurations. This introduces considerable uncertainty, hindering the application of a worst-case scenario approach. Consequently, the integrity of the assessment is compromised, preventing both the public and the competent authority from gaining an accurate understanding of the actual environmental impacts that may arise from the development.

Moreover, the application is heavily reliant on yet-to-be-defined mitigation measures, monitoring strategies, and management plans. This approach seeks consent on the premise that environmental harm will be addressed at a future stage, thereby obstructing any meaningful evaluation of the effectiveness of such measures or the assessment of residual impacts. Deferring critical information to stages beyond consent is procedurally unacceptable, contravening the fundamental aim of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation strategies be clearly delineated prior to decision-making.

There are also substantial gaps in evidence, including shortcomings in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. Such gaps create uncertainty about the scale and significance of impacts, particularly in instances where negligible or non-significant effects are asserted without robust supporting data. The lack of adequate information obstructs a clear comprehension of cumulative and worst-case impacts, fostering a level of scientific uncertainty that contradicts statutory obligations.

Consequently, the application does not satisfy the evidential standards set forth under the Habitats Regulations, which aim to exclude adverse effects beyond reasonable scientific doubt. This necessitates the application of the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate compliance with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it has not been established that impacts have been fully evaluated or that appropriate safeguards are in place.

In summary, the combination of reliance on an unspecified design envelope, the absence of defined mitigation, and deficiencies in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. Such shortcomings inhibit a lawful and rigorous evaluation of environmental effects, leaving the competent authority unable to make a fully informed decision based on the information available.

ASSESSMENT OF ALTERNATIVES

The inadequacy in the assessment of alternatives raises significant concerns regarding compliance with the statutory requirements of the Environmental Impact Assessment

regime. The application fails to provide a structured and reasoned comparison of realistic alternatives based on environmental effects, instead offering a narrative account of the project's evolution. This lack of clarity suggests that less harmful options have not been properly identified, assessed, or selected over more damaging solutions.

The analysis does not include a transparent or evidence-based comparison of alternative offshore locations, development scales, or design configurations. Specifically, there is no indication that the developer has seriously explored the possibility of positioning turbines further offshore, a move that could mitigate visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline, coupled with the critical importance of proximity to shore in evaluating impact, means that the absence of such analysis precludes any conclusion that the proposed siting is the least damaging option available.

Furthermore, these deficiencies extend to the cable routing and landfall assessment, where there is inadequate evidence that alternative routes have been thoroughly investigated to avoid or minimise impacts on sensitive receptors. This includes locations of cultural and spiritual significance, such as Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis point to a failure to apply mitigation by design, relying instead on measures intended to address issues post-design.

Consequently, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This omission reflects a neglect of the established mitigation hierarchy and hinders the competent authority's ability to ascertain whether more suitable and less harmful alternatives exist. The absence of a comprehensive alternatives assessment raises doubts about the sustainability and policy compliance of the proposal.

From a policy standpoint, this deficiency undermines adherence to National Planning Framework 4, particularly concerning the protection of natural environments, cultural heritage, and the wellbeing of communities. The failure to conduct a structured and comparative assessment constitutes a material oversight, ultimately leading to the conclusion that the application has not been sufficiently evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The application lacks a thorough assessment of marine ecology and protected species, which is crucial for understanding the ecological receptors in the West Lewis coastal area. This region is known for its sensitivity and biological activity, yet the baseline data remains incomplete. The methods used have not effectively captured important details about species presence, behaviour, and habitat usage. Consequently, the assessment fails to provide a solid evidential basis to evaluate the potential impacts.

One significant oversight is the failure to appropriately acknowledge the presence of otters, which are protected under European law. The application does not adequately

assess their use of coastal areas for foraging and movement. There is insufficient consideration of their core foraging range and behavioural patterns, leading to an inadequate assessment of potential impacts from construction disturbance, noise, and increased activity. This lack of information undermines any claims of no significant effects on otters.

Additionally, the assessment of basking sharks shows shortcomings, as the reliance on aerial surveys creates a significant detection bias, particularly under Atlantic weather conditions. This method is likely to underestimate their presence, especially when compared to established land-based observations that indicate frequent use of these waters. Ignoring or inadequately considering this data contributes to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings mean that claims of negligible or non-significant effects stem from assumptions rather than strong evidence. Without sufficient baseline data, it becomes impossible to assess cumulative and indirect impacts meaningfully, including seasonal variations and broader ecosystem interactions. This situation leads to uncertainty regarding the actual risk faced by marine species and habitats.

From a regulatory standpoint, the application does not comply with the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, since it fails to properly identify or assess protected species. The uncertainty created by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus necessitating the precautionary principle. Given these issues, consent cannot be lawfully granted.

Overall, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These issues hinder a thorough evaluation of impacts on marine ecology and protected species and contribute to the conclusion that the application lacks a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application fails to meet the evidential threshold required to conclude no adverse effect on the integrity of protected sites. Significant gaps in evidence and internal inconsistencies undermine the ornithological assessment, casting doubt on the reliability of its conclusions. The presence of contradictory findings raises questions, particularly given that a Habitats Regulations derogation case is only necessary where significant harm is anticipated. This inconsistency suggests that the assessment does not provide adequate support for its conclusions.

The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application does not sufficiently demonstrate that these species will not be adversely affected. Critical foraging areas and migratory pathways are located within the development site, yet the assessment fails to robustly evaluate the potential implications of displacement, collision risk, or habitat loss. Furthermore, the assessment does not adequately

address the importance of feeding grounds associated with protected sites, including the Lewis Peatlands and St Kilda. The reliance on modelling approaches introduces uncertainty, particularly for species such as Kittiwakes and Fulmars, which are in severe decline.

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

These 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 remain unaffected places the proposal in direct conflict with national policy.

Taken together, the shortcomings in the assessment—marked by internal inconsistency, methodological weaknesses, and insufficient evidence—prevent a thorough evaluation of impacts and lead to the overall conclusion that the application does not meet the statutory requirements necessary for determination. The standard of beyond reasonable scientific doubt has not been achieved, thereby engaging the precautionary principle and precluding a lawful conclusion in support of consent.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is fundamentally flawed, failing to acknowledge the West Lewis coastline as a dynamic cultural landscape where the environment, language, tradition, and community are deeply intertwined. It adopts a simplistic viewpoint, treating heritage as mere isolated assets rather than recognising their ongoing social, cultural, and spiritual relevance to the community.

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

Moreover, the application overlooks intangible cultural heritage elements, including the Gaelic language and traditions, as well as the long-standing connection between the community and the coastal environment. These factors are vital to the area's identity but are conspicuously absent from the assessment, representing a serious omission. Without acknowledging these aspects, the cultural impact of the development cannot be accurately gauged.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population holds a distinct cultural identity, recognised as that of an Indigenous

People; however, no Free, Prior and Informed Consent process has been followed. This lack of meaningful engagement undermines the assessment's credibility and fails to adhere to established principles of participation in matters affecting cultural and environmental interests.

Additionally, the absence of a compliant Island Communities Impact Assessment is a critical procedural failure. This assessment is a statutory requirement under the Islands (Scotland) Act 2018. Without it, the competent authority is unable to fulfil its legal responsibility to evaluate the social, cultural, and economic impacts on the island community, thereby preventing a lawful determination.

From a policy standpoint, these deficiencies place the proposal in direct opposition to 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 the disregard for living cultural practices, clearly deviates from policy requirements.

Collectively, the neglect to assess living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application fails to provide a robust basis for determining the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal lacks transparency regarding social impacts, health, and wellbeing, significantly undermining its evaluation. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents, yet the full report remains unpublished. This absence creates an evidential gap that hinders both public understanding and the competent authority's ability to grasp the extent of social risks identified in the developer’s research.

Residents have reported experiencing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposed development. These reported impacts stem from direct engagement with the community and are not based on speculation. However, the failure to release the complete assessment restricts proper scrutiny of its findings and limits the determination of their significance in the decision-making process.

Furthermore, there are indications that the proposal is viewed as a threat to community identity and cohesion, with the developer acknowledging "cultural loss" in their findings. Yet, these social impacts have not been fully integrated into the application or given due consideration. The withholding of the full Social Impact Assessment conceals the true human and social costs associated with the development.

This lack of transparency also compromises the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health implications is crucial for developments of this magnitude, especially when community character

and functioning could be affected. Without the complete dataset, the application fails to provide a robust evidential foundation for weighing benefits against potential harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Developments are expected to foster positive health outcomes and mitigate harm, yet existing evidence points to adverse effects that have not been fully disclosed. Consequently, without the complete assessment, compliance with this policy remains unproven.

The procedural ramifications are significant; the competent authority cannot conduct a thorough socio-economic and health evaluation without access to the entire Social Impact Assessment. This omission constitutes a material flaw in the application and a failure to satisfy the evidential requirements mandated by the Environmental Impact Assessment regime.

Collectively, the non-disclosure of the full Social Impact Assessment, coupled with documented existing adverse impacts, renders the assessment both incomplete and unreliable. This situation obstructs a lawful determination and reinforces the view that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon and undeveloped nature, which contribute to a strong sense of remoteness. The assessment of seascape, landscape, and visual impacts related to the proposed turbines is materially deficient, failing to adequately reflect the scale of change and the sensitivity of the receiving environment. The introduction of large-scale turbines in close proximity to the shoreline would create a continuous industrial presence, fundamentally altering this character and leading to a permanent transformation of the landscape.

The application does not sufficiently represent the magnitude of visual change. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and widely used coastal locations, directly impacting visual amenity and undermining the defining qualities of naturalness and remoteness. This level of impact and its significance within such a sensitive landscape have not been properly conveyed in the assessment.

Moreover, there are methodological concerns regarding the selection and presentation of visual viewpoints. Evidence suggests that these viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. Such shortcomings risk understating the magnitude of visual impact, thus undermining the reliability of the assessment.

The assessment also neglects to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Important sites, like the Calanais Standing Stones and other Scheduled Monuments, are integral to a wider landscape setting

connected by visual and spatial relationships to the Atlantic horizon. Treating these assets in isolation fails to acknowledge their interdependence, resulting in an incomplete evaluation of impacts on their setting and cultural significance.

The industrialisation of the seascape would sever these vital connections, altering the context in which heritage assets are experienced and disrupting their relationship with the natural horizon. This represents not only a visual impact but a broader cultural and spatial harm that has not been adequately assessed in the application.

From a policy perspective, the proposal is at odds with National Planning Framework 4, particularly concerning the protection of natural places and historic assets. The scale of change is incompatible with the requirement to safeguard landscape character, visual amenity, and the setting of culturally significant sites. The lack of a robust worst-case assessment further undermines any claim of compliance with policy.

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. The resulting change is fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks critical detail necessary for a thorough assessment of construction and pollution risks, rendering the evaluation of likely environmental effects materially deficient. The application does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans, despite involving substantial seabed preparation and installation works in a high-energy Atlantic environment. Instead, it relies on mitigation and contingency measures that would be prepared only after consent is granted, which prevents any meaningful assessment of their adequacy or effectiveness.

Concerns arise particularly due to the sensitivity of the receiving environment along the West Lewis coastline, which is home to clean coastal waters and important habitats that could be adversely affected by sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide sufficient detail on preventive, control, or monitoring measures.

Uncertainty persists regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty is further exacerbated when

considering potential effects on marine species and habitats already recognised as sensitive in the broader assessment.

The lack of detailed emergency response procedures amplifies these issues. By deferring contingency planning to a post-consent stage, the application undermines the ability of the competent authority to evaluate whether appropriate safeguards are in place to address pollution events. This introduces procedural risks and hinders the assessment of environmental protection measures at the time of decision-making.

From a regulatory standpoint, the failure to define critical environmental safeguards contradicts the Environmental Impact Assessment requirements. Significant effects and mitigation strategies must be evaluated prior to granting consent, and the absence of such information means a lawful determination cannot be made. Furthermore, the application does not demonstrate compliance with relevant policy requirements concerning environmental protection and water quality.

In summary, the combination of undefined mitigation measures, the lack of detailed management plans, and the uncertainties regarding potential impacts undermines the integrity of the assessment, further supporting the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents a concerning contradiction regarding the potential harm to European Protected Species, where the need for licences is recognised while simultaneously describing impacts as negligible. This inconsistency raises significant doubts about the validity of the assessment and questions compliance with the Habitats Regulations, especially in cases where harm is expected to necessitate legal authorisation.

Moreover, the assessment of fisheries and marine life is inadequate, failing to deliver a thorough analysis of both ecological and socio-economic effects. The waters off the West Lewis coast are home to a rich marine ecosystem and a vibrant fishing industry, yet there is no demonstration that these vital uses and habitats can be safeguarded without serious disruption. A key issue is the erroneous assumption that fishing activities can be relocated without adverse consequences. The application lacks evidence indicating that alternative fishing grounds exist, are accessible, or can withstand additional pressure. This gap is critical, as it poses risks of overfishing in other areas and could have broader economic repercussions for the local fishing fleet.

There is also a significant oversight in evaluating cumulative impacts from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough examination of these combined effects, it is impossible to ascertain the overall implications for marine ecosystems and socio-economic conditions. The proposal is set to introduce considerable risks to marine species, particularly through construction-related underwater noise. The use of high-energy hammer piling over extended durations is expected to disturb marine life across

wide areas, with potential adverse effects on species like dolphins. The anticipated disturbance to a substantial portion of the local bottlenose dolphin population raises serious concerns, yet the application downplays these effects without adequate supporting evidence.

Additionally, from a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not prove that the development can coexist with existing marine users or avoid significant negative impacts on marine biodiversity, which hampers any assertion that the proposal constitutes sustainable development.

In conclusion, the deficiencies in evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal contradictions render the assessment incomplete and untrustworthy. These shortcomings obstruct a comprehensive evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment concerning the onshore infrastructure is significantly incomplete and neglects to consider the full range of impacts stemming from what constitutes a single integrated project. The offshore turbines are closely interconnected with the onshore works, yet they are assessed in isolation, leading to a disjointed approach that conceals the true extent of environmental and socio-economic repercussions.

The onshore aspects of the project include cabling that crosses protected moorland, the construction of a substation near Stornoway, and the establishment of access routes through sensitive landscapes. Notably, this work involves excavation across deep peat areas, especially within Barvas Moor, an important carbon store and ecologically sensitive habitat. The application fails to deliver a thorough assessment of these impacts, thereby hindering a comprehensive understanding of the project's overall environmental footprint.

Excluding or postponing the assessment of onshore impacts restricts a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components are considered collectively; however, the differentiation between offshore and onshore elements leads to a lack of clarity regarding the combined impacts on peatlands, habitats, and local communities.

Additionally, there are considerable risks to delicate habitats, such as machair systems and peatland environments, which are protected by policy. The application does not prove that the impacts on these habitats have been thoroughly evaluated or that suitable avoidance measures have been implemented, creating a significant evidential gap in terms of biodiversity protection.

Concerns also arise regarding carbon balance. The disturbance of peatland results in the release of stored carbon, potentially incurring a carbon debt that contradicts the goals of renewable energy development. The application does not sufficiently address

this matter or demonstrate that the overall carbon balance is beneficial.

Furthermore, routing infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application lacks evidence that the necessary consents or processes have been undertaken, casting doubt on the feasibility and lawful execution of the project.

From a policy standpoint, the failure to assess the project in its entirety and to show protection for 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 section of the application incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding dark skies and nocturnal wildlife within the Environmental Impact Assessment is a significant shortcoming. The proposed development along the West Lewis coastline introduces permanent red aviation lighting, which is visible over extensive distances and creates a continuous and intrusive "wall of light" effect across the western horizon. This alteration fundamentally impacts the night-time environment, which is characterised by exceptionally dark skies that contribute to the area's environmental quality, cultural identity, and tourism value.

Moreover, the application fails to evaluate the effects of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. Given the critical role of dark skies in the region's identity and the emerging sector of astro-tourism, this oversight is particularly concerning. The absence of such assessments indicates a notable gap in the overall evaluation of landscape and environmental impacts.

Importantly, there is no consideration of how artificial lighting affects nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel exhibit high sensitivity to artificial lighting due to phototaxis, which may cause disorientation and elevate collision risks. The application does not include a lighting impact assessment or a phototaxis study, thereby neglecting potential effects on these species and their mortality rates.

This omission is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to reflect nocturnal activities and associated hazards. Additionally, species like Kittiwakes, known to forage or migrate at night, are similarly at risk of disorientation from artificial lighting, yet this potential threat has not been evaluated. The lack of site-specific night-time data creates a critical deficit in understanding the ecological impacts.

Without a thorough assessment of nocturnal effects, it remains impossible to ascertain whether protected species or designated sites would experience adverse impacts. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not satisfied, invoking the precautionary principle and obstructing a lawful determination.

From a policy standpoint, the omission stands in conflict with National Planning Framework 4 regarding the protection of natural places and environmental quality. Additionally, it undermines the overall assessment of landscape and seascape impacts, given that night-time character is an essential component of the environment.

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

TOURISM

The assessment of tourism impacts is significantly lacking, failing to consider the economic and social consequences for a vital part of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, nearly untouched landscape, dark skies, and a sense of remoteness. Although the application acknowledges that 86% of visitors are attracted by the scenery, it does not provide a detailed evaluation of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or overall economic contributions.

The tourism sector has seen substantial growth, increasing from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the island’s economy. Nevertheless, the application fails to consider how the industrialisation of the seascape and deterioration of environmental quality could affect Tourism Gross Value Added or the resilience of the wider economy. Without this analysis, it is impossible to determine if the proposed development would yield a net economic benefit or detrimentally impact an established and expanding sector.

Moreover, the assessment does not address the critical role of environmental quality in sustaining tourism, overlooking the significance of unspoiled landscapes and dark skies for visitor experiences and emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this oversight, creating a substantial gap in understanding the implications for a recognised and burgeoning segment of the local economy.

In a community with limited economic diversity, neglecting the impacts on tourism carries broader implications for employment, local businesses, and community sustainability. The absence of a thorough Island Communities Impact Assessment means these economic vulnerabilities have not been examined as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with the National Planning Framework 4, especially concerning economic impact and the necessity to show net benefits. It also contradicts strategic objectives that designate tourism as a priority growth sector, lacking sufficient evidence for the competent authority to evaluate the economic ramifications of the proposal.

Overall, the failure to quantify tourism impacts, assess environmental influences on visitor behaviour, and consider the island's economic dependencies results in a significant evidential void. This inhibits a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm stands as a clear failure to meet the standards of sustainable development, as established by statutory obligations, national policy, and evidential criteria. It mirrors the core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the scale of industrialisation. Despite being submitted under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, it still falls short.

A complete and reliable evidential basis for determining this application is lacking. There are significant gaps in baseline data, and the use of an undefined design envelope raises concerns. Additionally, the application relies on unspecified mitigation measures and fails to address critical impact pathways, including those affecting nocturnal wildlife, onshore infrastructure, and tourism. As a result, the Environmental Impact Assessment is incomplete, hindering a full understanding of likely significant effects and residual impacts.

Procedural failures are also evident in this application. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018. Furthermore, the failure to disclose the full Social Impact Assessment constitutes a material omission. These shortcomings inhibit 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 is in direct opposition to National Planning Framework 4, as it does not adequately protect biodiversity, natural environments, and cultural heritage. It has not demonstrated that health and wellbeing impacts are acceptable, nor can it prove a net economic benefit due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been adequately assessed, leading to obscured impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. The assessments pertaining to marine ecology, seabirds, protected species, and marine mammals are

incomplete and exhibit inconsistencies. The evidential threshold required to rule out adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and precluding a lawful conclusion that impacts are acceptable.

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

In summary, the application is both procedurally and substantively unfit for determination. The extensive deficiencies in information, coupled with conflicts with policy and unresolved environmental risks, obstruct a lawful and evidence-based decision. The competent authority must refuse consent on these grounds or utilise 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 be denied in its entirety.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 708456F1

Member of the public 1066

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. It is informed by an examination of the Environmental Impact Assessment Report and accompanying documents, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural compliance. The project is situated off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, relatively untouched environment, and rich cultural identity. Concerns arise from the proposal's scale, proximity to the shoreline, and design, particularly regarding its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis for a lawful decision. Key environmental data is absent, baseline information is inconsistent and limited, and several crucial elements of the proposal remain undefined. The adoption of a flexible design framework obscures the understanding of potential significant effects, while the reliance on unspecified mitigation measures renders it impossible to evaluate their efficacy. Consequently, the documentation fails to facilitate a comprehensive understanding of the environmental, cultural, or community impacts involved, and the assertions of negligible or non-significant effects are unsubstantiated by robust evidence.

Furthermore, there are evident and substantial conflicts with policy. The proposal seems at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not provide assurance that national standards for protecting biodiversity, climate interests, and environmental integrity can be fulfilled. These discrepancies directly affect the statutory criteria required for consent and compromise the competent authority's ability to determine that the development is acceptable under policy frameworks.

The unprecedented scale of this proposal introduces large turbines positioned very near to the shoreline, raising major concerns about landscape capacity, visual dominance, and overall environmental impact. Collectively, the lack of adequate information, the reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and fails to provide a transparent or reliable depiction of the potential environmental consequences of the proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates substantial uncertainty. This lack of commitment prevents a consistent worst-case scenario analysis, ultimately undermining the integrity of the assessment. Consequently, the impacts presented may not accurately represent the actual development, leaving both the public and the competent authority unable to comprehend the true environmental effects.

Moreover, the application places significant reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent on the premise that environmental harm will be addressed later hinders any meaningful evaluation of effectiveness or residual impacts. This postponement of essential 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 clearly established prior to the determination of the application.

There are also considerable evidential shortcomings, including incomplete baseline data, methodological limitations, and the use of assumptions instead of site-specific evidence. This leads to uncertainty regarding the magnitude and significance of impacts, particularly where conclusions of negligible or non-significant effects are presented without sufficient supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainties that cannot be reconciled with statutory obligations.

As a result, the application does not meet the evidential requirements outlined in the Habitats Regulations, which necessitate the exclusion of adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly in relation to protected species and sensitive habitats. Furthermore, the proposal does not demonstrate adherence to the National Planning Framework 4, specifically concerning biodiversity protection and environmental integrity, since it fails to show that impacts have been fully assessed or that appropriate safeguards are established.

In summary, the reliance on an unspecified design envelope, the absence of defined mitigation strategies, and the gaps in baseline data collectively render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies preclude a lawful and robust evaluation of environmental effects, leaving the competent authority unable to make a determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application fails to adequately assess alternatives, which does not satisfy the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of viable alternatives based on their

environmental effects, it merely outlines the project's development history. This lack of analysis does not show that less harmful options have been properly identified and assessed in preference to more damaging solutions.

There is no clear or evidence-based comparison regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not indicate that the developer has given serious consideration to placing turbines further offshore, where visual, ecological, and coastal impacts would probably be lessened. The sensitivity of the West Lewis coastline makes proximity to shore crucial in assessing impact. The lack of such analysis means that it cannot be concluded that the proposed siting is the least damaging option.

This inadequacy also applies to cable routing and landfall assessment. There is insufficient evidence that alternative routes have been thoroughly examined to avoid or lessen impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The absence of a clear strategy to avoid such impacts, along with the lack of comparative analysis, suggests that design-based mitigation has not been implemented, leading instead to reliance on post-design mitigation measures.

Consequently, the application does not show that environmental harm has been minimised through site selection, layout, and routing of infrastructure. This is a failure to adhere to the established mitigation hierarchy and prevents the competent authority from determining whether there are less harmful and more suitable alternatives. Without a thorough assessment of alternatives, it cannot be concluded that the proposal is sustainable or compliant with policy.

From a policy standpoint, this deficiency undermines adherence to National Planning Framework 4, particularly regarding the protection of natural areas, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission that leads to the conclusion that the application has not been sufficiently evaluated and cannot support a lawful decision.

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.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed and raises serious concerns among the local community. 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 the necessary evidence to show that these species will not face adverse effects as a result of the development. Key foraging areas and migratory pathways have not been adequately evaluated, with significant gaps in the analysis regarding displacement, collision risk, and habitat loss.

Moreover, the application contains a critical contradiction. The developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which should only be necessary if significant harm is anticipated. This inconsistency undermines the reliability of the assessment, suggesting that the conclusions drawn are not substantiated by the evidence

presented.

Additionally, there is insufficient evidence regarding the impact on seabirds linked to protected sites such as the Lewis Peatlands and St Kilda. The importance of these feeding grounds is not fully recognised, and the reliance on modelling approaches raises uncertainties, particularly concerning species like Kittiwakes and Fulmars that are already experiencing severe decline. The methodologies employed are likely to underestimate mortality rates, especially given the incomplete baseline data and the lack of understanding regarding behavioural responses.

The placement of turbines within a recognised migratory corridor creates a significant risk, effectively establishing a barrier along a primary flight path for species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor, as well as the potential consequences for species with small global populations, have not been thoroughly assessed.

From a regulatory standpoint, the application does not meet the required evidential threshold to determine that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This situation invokes the precautionary principle and renders a lawful conclusion in favour of consent unattainable.

The identified deficiencies highlight 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 this 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 issues hinder a robust evaluation of impacts and collectively suggest that the application does not fulfil 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 intrinsically connected. However, the assessment of cultural heritage and community identity within the application is fundamentally inadequate. It adopts a reductive approach, treating heritage as isolated and static assets without acknowledging their ongoing social, cultural, and spiritual functions within the community.

Particularly concerning is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These are active burial sites and places of spiritual practice, yet they are categorised in the assessment as static features. This failure to consider their continued use and meaning, along with the potential impact of development on their settings, leads to an incomplete evaluation of cultural effects and

disregards their importance in community life.

Furthermore, the application neglects to assess intangible cultural heritage, including the Gaelic language and traditions that define the community's long-standing relationship with the coastal environment. These elements are central to the area's identity but are entirely overlooked in the assessment, creating a significant omission that hinders a comprehensive understanding of the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, with its distinct cultural identity recognised as characteristic 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 legitimacy and fails to reflect established principles of participation in decisions that affect cultural and environmental interests.

A critical procedural failure is the absence of a compliant Island Communities Impact Assessment, which is a statutory requirement under the Islands (Scotland) Act 2018. The lack of this assessment means that the competent authority cannot meet its legal duty to evaluate the social, cultural, and economic impacts on the island community, rendering any determination unlawful.

These deficiencies place the proposal in direct conflict with National Planning Framework 4, particularly regarding the protection of historic assets and places. The neglect of both tangible and intangible heritage, along with the failure to recognise living cultural practices, represents a clear departure from policy requirements.

Collectively, the failure to adequately assess living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential gap. The cultural impacts of the development remain unassessed, and the application does not provide a sufficient basis for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The failure to disclose the full Social Impact Assessment is a significant concern that undermines the Environmental Impact Assessment process. Without this transparency, the competent authority cannot conduct a robust evaluation of the social, economic, and health implications of the proposed development. The absence of complete data constitutes a material omission and fails to meet the evidential requirements necessary for lawful decision-making.

Local residents have expressed measurable stress, anxiety, and concern due to the scale and proximity of the proposal, which reflects a tangible impact rooted in direct engagement. This evidence, derived from community feedback, highlights the risks associated with the development but remains inadequately addressed in the application due to the non-disclosure of the full assessment.

Moreover, the developer's findings indicate a perception of the proposal as a threat to community identity and cohesion, with significant concerns about "cultural loss." However, these issues have not been fully integrated into the application or given proper consideration. As a result, the true human and social cost of the development remains obscured, limiting the ability to assess the overall significance of these impacts.

From a policy perspective, there is a failure to comply with National Planning Framework 4, which emphasizes the need for developments to support positive health outcomes and avoid harm. The existing adverse effects highlighted in the available evidence have not been sufficiently disclosed, making it impossible to demonstrate adherence to this policy.

Collectively, these issues reveal a concerning gap in the assessment process. The non-disclosure of the full Social Impact Assessment, coupled with the evidence of existing negative impacts, results in an incomplete and unreliable evaluation. This hinders the ability to make a lawful determination regarding the application and highlights the necessity for a comprehensive understanding of the social impacts involved.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment presented regarding the seascape, landscape, and visual impacts is fundamentally inadequate, failing to accurately capture the extent of change and the sensitivity of the environment. The West Lewis coastline is characterised by its expansive Atlantic horizon, its undeveloped nature, and a profound sense of remoteness. The proposal to introduce large-scale turbines near the shore would lead to a continuous and overwhelming industrial presence, significantly altering this distinctive character and resulting in an irreversible transformation of the landscape.

Additionally, the application does not sufficiently reflect the extent of the visual change that would occur. The size and closeness of the turbines would dominate the views from residential areas, historic sites, and popular coastal locations. This would directly impact visual amenity and undermine the essential qualities of naturalness and remoteness. The assessment fails to adequately express the level of this impact or its significance within the context of such a sensitive landscape.

Concerns arise regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that the viewpoints chosen may not accurately represent the most sensitive receptors or the worst-case scenarios, especially regarding key cultural heritage sites and high-value landscapes. This leads to the possibility that the magnitude of visual impact has been understated, thereby questioning the reliability of the assessment.

Moreover, there is a notable deficiency in assessing the interconnected relationship between the landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape framework linked by visual and spatial relationships to the Atlantic horizon.

The assessment treats these heritage assets in isolation instead of recognising their interdependence, resulting in a failure to thoroughly evaluate the impacts on their setting and cultural significance.

The industrialisation of the seascape threatens to sever these vital connections, altering the context in which heritage assets are appreciated and disrupting their ties to the natural horizon. This represents a visual impact along with broader cultural and spatial harm that the application has not adequately evaluated.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, particularly concerning the safeguarding of natural places and historical assets. The scale of proposed changes is incompatible with the need to preserve landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the lack of a solid worst-case assessment undermines any assertions of policy compliance.

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

In conclusion, the assessment fails to represent the impact's scale accurately, the environment's sensitivity, and the interconnected nature of landscape and heritage. These shortcomings hinder a reliable evaluation and strongly support the view that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks sufficient detail necessary for a thorough evaluation of construction and pollution risks, which is particularly concerning given the project's location along the West Lewis coastline. This area is known for its clean coastal waters and important habitats that could be significantly affected by sediment disturbance and contamination. The application does acknowledge certain risks, such as sediment mobilisation and the possibility of accidental chemical or oil spills; however, it does not adequately detail the measures that will be implemented to prevent, control, or monitor these risks.

Substantial seabed preparation and installation works are proposed in a high-energy Atlantic environment, yet there are no developed Construction Environmental Management Plans or Pollution Prevention Plans included in the application. Instead, it relies on mitigation and contingency measures that are intended to be prepared after consent, which limits any meaningful assessment of their effectiveness and adequacy.

The uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation is another critical concern. Without robust modelling or clearly defined management strategies, the potential extent, duration, or ecological impacts cannot be accurately assessed. This uncertainty extends to marine

species and habitats identified as sensitive in the wider assessment.

Moreover, the lack of detailed emergency response procedures further complicates the situation. By postponing contingency planning to a post-consent phase, the application hampers the evaluation of whether appropriate safeguards can be put in place to manage pollution events. This procedural risk undermines the competent authority's ability to assess environmental protection measures adequately.

From a regulatory standpoint, the deferral of essential environmental safeguards contravenes the requirements of the Environmental Impact Assessment regime. It is essential for likely significant effects and mitigation strategies to be evaluated prior to consent, and the absence of this information means that a lawful determination cannot be achieved. Furthermore, the application fails to demonstrate compliance with the relevant policy requirements concerning environmental protection and water quality.

In summary, the deficiencies in defined mitigation measures, the absence of detailed management plans, and the uncertainties regarding potential impacts collectively render the assessment materially inadequate. These gaps further support the conclusion that the application lacks completeness.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry, yet the application related to this development lacks a thorough assessment of its ecological and socio-economic impacts. A critical flaw is the presumption that fishing activities can be relocated without repercussions. There is no evidence presented that alternative fishing grounds are available, easily accessible, or capable of withstanding additional fishing pressure. This significant gap raises concerns over potential overfishing in other areas, which could adversely affect the local fishing fleet's economic stability. The absence of a clear, evidence-based evaluation makes it impossible to fully understand the implications for fisheries and local livelihoods.

Furthermore, the proposal poses considerable risks to marine species, particularly due to the underwater noise produced during construction activities. The use of high-energy hammer piling for prolonged periods is expected to disturb marine life across extensive areas, impacting species such as dolphins. The predicted disturbance to a considerable portion of the local bottlenose dolphin population is alarming, yet the application minimises these concerns without adequate supporting evidence.

Additionally, there is a notable inconsistency in the application regarding the need for licenses to permit harm to European Protected Species, which is acknowledged while simultaneously stating that the impacts are negligible. This contradiction undermines the assessment's credibility and raises compliance issues with the Habitats Regulations, particularly when anticipating harm that necessitates legal authorisation. The assessment further fails to consider cumulative impacts from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without

a comprehensive analysis of these compounded effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not align with the requirements of the National Planning Framework 4 or the National Marine Plan. It does not demonstrate how the development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, thus precluding any assertion that the proposal constitutes sustainable development. Collectively, the inadequacies surrounding evidence on fishing displacement, the underestimation of acoustic impacts, and the inconsistencies within the assessment highlight its incompleteness and unreliability, obstructing a thorough evaluation of the implications for marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is significantly lacking and does not fully account for the impacts resulting from what constitutes a single integrated project. The offshore turbines and onshore works are interconnected; however, they are evaluated separately. This fragmented approach obscures the true magnitude of environmental and socio-economic effects.

The onshore components encompass cabling across protected moorland, the construction of a substation near Stornoway, and the associated access infrastructure that traverses sensitive landscapes. These activities necessitate excavation in areas of deep peat, particularly within Barvas Moor, an important carbon store and ecologically sensitive habitat. Without a thorough assessment of these impacts, the application fails to provide a complete understanding of the project's environmental footprint.

By not including or delaying the assessment of onshore impacts, the application hinders a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively; yet, the distinct treatment of offshore and onshore elements obscures the combined impacts on peatlands, habitats, and communities.

Additionally, there are considerable risks to sensitive habitats, such as machair systems and peatland environments, which are under policy protection. The application does not sufficiently demonstrate that the impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been considered. This creates a significant evidential gap concerning biodiversity protection.

Concerns also arise regarding carbon balance, as the disturbance of peatland can release stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy development. The application inadequately addresses this matter or illustrates that the overall carbon balance is indeed advantageous.

Furthermore, routing infrastructure through active croft land poses potential conflicts with established land use and legal rights. The application lacks evidence that the necessary consents or processes have been initiated, which raises issues regarding the

feasibility and lawful execution of the project.

From a policy standpoint, the inability 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 failure to show that impacts can be avoided or mitigated further weakens the application.

In summary, the division of project components, the absence of a comprehensive assessment, and the lack of evidence concerning environmental and land use impacts render this portion of the application incomplete and unreliable, thus obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline boasts exceptionally dark skies, which are crucial for the area's environmental quality, cultural identity, and tourism potential. The proposal introduces permanent red aviation lighting that will be visible across long distances, creating an intrusive “wall of light” effect that will fundamentally change the night-time environment.

The Environmental Impact Assessment fails to evaluate the consequences of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This lack of consideration is particularly concerning given the significance of dark skies to the local identity and the emerging astro-tourism sector. Consequently, there exists a clear gap in the overall landscape and environmental assessment due to this oversight.

Equally concerning is the complete absence of an evaluation regarding the impacts on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are highly susceptible to artificial lighting, as it can lead to disorientation and increased collision risks. The application lacks any lighting impact assessment or phototaxis study, thereby failing to examine how the proposed aviation lighting might affect these species or contribute to increased mortality rates.

The reliance on daytime survey data in the ornithological assessment only exacerbates the issue, as it does not account for nocturnal activity or the associated risks. Other species, such as Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been evaluated. The absence of site-specific night-time data constitutes a serious gap in understanding the potential ecological impacts.

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

From a policy standpoint, these omissions directly conflict with National Planning Framework 4 regarding the protection of natural places and environmental quality. They also weaken the overall assessment of landscape and seascape impacts, as night-time character is an integral part of the environment.

Overall, the failure to assess 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 incapable of supporting a lawful determination.

TOURISM

The economic and social consequences of the proposed development for tourism on the Isle of Lewis are inadequately addressed, particularly given that tourism is a crucial sector of the local economy. The region's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness are vital for attracting visitors. While the application notes that 86% of visitors come for the scenery, it fails to provide a quantified analysis of how large-scale offshore infrastructure may influence visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism in the area has witnessed substantial growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and constitutes up to 16% of the island's economy. However, the application neglects to model how the proposed industrialisation of the seascape and the potential loss of environmental quality would affect Tourism Gross Value Added or the wider economic resilience of the community. This lack of analysis leaves uncertainty regarding whether the development would yield a net economic benefit or detract from a vital and expanding sector.

Furthermore, the assessment does not take into account the significance of environmental quality in enhancing tourism, particularly the necessity of unspoiled landscapes and dark skies for visitor experiences and emerging markets such as nature-based tourism and astro-tourism. The omission of a Dark Skies Assessment exacerbates this shortcoming, resulting in a significant gap in understanding the implications for a recognised and growing segment of the local economy.

In an island community that lacks economic diversification, the failure to evaluate tourism impacts carries broader implications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been adequately considered, contravening the requirements set forth in the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not sufficiently demonstrate compliance with National Planning Framework 4, especially concerning economic impact and the obligation to show net benefit. It contradicts strategic objectives that highlight tourism as a priority growth sector and fails to provide the necessary evidence for the competent authority to assess the economic implications of the proposal.

In conclusion, the collective failure to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and acknowledge the island's economic dependency culminates in a significant evidential gap. This shortfall hinders a comprehensive evaluation of economic effects and underlines the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development as outlined by statutory duties, national policy, and evidential standards. It mirrors the issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was a concern. This new application is presented within a stronger policy framework that places significant emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

A reliable evidential basis for determination is lacking, characterised by critical gaps in baseline data. The ongoing use of an undefined design envelope and reliance on unspecified mitigation measures further undermine its credibility. Additionally, important impact pathways, such as those affecting nocturnal wildlife, complete onshore infrastructure, and tourism implications, have been omitted. As a result, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of potential significant effects or residual impacts.

Moreover, there are notable procedural shortcomings. The lack of a compliant Island Communities Impact Assessment contravenes the statutory duty established under the Islands (Scotland) Act 2018, while the failure to disclose the complete Social Impact Assessment represents a significant omission. These shortcomings hinder the competent authority from properly evaluating impacts on community wellbeing, cultural identity, and economic resilience, making the application unsuitable for determination.

In direct contradiction to National Planning Framework 4, the proposal does not demonstrate adequate protection for biodiversity, natural places, and cultural heritage. It fails to show that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. Furthermore, the cumulative effects of both offshore and onshore elements have not been thoroughly assessed, obscuring their impact on peatlands, carbon balance, habitats, and crofting land.

Uncertain and potentially significant environmental risks are present. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

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

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: BEB56150

Member of the public 1067

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted in accordance with the relevant marine licensing and Environmental Impact Assessment frameworks. The objection is informed by a comprehensive review of the Environmental Impact Assessment Report and associated documentation, revealing significant deficiencies in planning, environmental considerations, cultural implications, and procedural compliance. The site of the proposed development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and distinct cultural identity. Concerns arise regarding the compatibility of the proposal with statutory obligations, national policies, and the overarching principles of sustainable development, particularly considering its scale, proximity to the shoreline, and design.

The application lacks an adequate evidential basis necessary for a lawful determination. Essential environmental data is absent, baseline information is both limited and inconsistent, and several critical elements of the proposal remain undefined. The flexible design framework employed obscures the potential significant effects, while the reliance on unspecified mitigation measures raises questions about their efficacy. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects are unsupported by credible evidence.

Moreover, there are evident and significant conflicts with established policies. 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 public health and wellbeing. It does not sufficiently demonstrate compliance with national obligations to protect biodiversity, climate interests, and environmental integrity. These discrepancies directly challenge the statutory tests required for consent and inhibit the competent authority from reaching a conclusion that the development is acceptable from a policy perspective.

The unprecedented scale of the proposal raises additional concerns due to the large turbines being positioned in close proximity to the shoreline, leading to significant issues regarding landscape capacity, visual impact, and overall environmental consequences. Collectively, the lack of comprehensive information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy violations indicate that the application is incomplete and fails to support a lawful determination. Under these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate, failing to deliver a complete, transparent, and trustworthy account of the likely environmental effects associated with the proposal. The reliance on a flexible Project Design Envelope, which lacks specific commitments to turbine dimensions, layouts, or configurations, creates substantial uncertainty and impedes the consistent application of a worst-case scenario. This weakness undermines the integrity of the assessment, obscuring the true environmental impacts and preventing both the public and the competent authority from grasping the full extent of these effects.

Furthermore, the application significantly depends on mitigation measures, monitoring strategies, and management plans that are yet to be defined. By seeking consent on the premise that environmental harm will be mitigated later, it hinders a thorough evaluation of effectiveness and the assessment of residual impacts. This postponement of critical information to stages after consent is procedurally unacceptable, contradicting the purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigations must be clearly established before determination.

Additionally, there are major evidential shortcomings, such as gaps in baseline data, methodological limitations, and a reliance on assumptions instead of site-specific evidence. These deficiencies generate uncertainty regarding the scale and significance of impacts, particularly where claims of negligible or non-significant effects lack robust supporting data. The insufficient information results in an unclear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that does not align with statutory requirements.

Consequently, the application does not meet the evidential threshold established under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This situation activates the precautionary principle, especially concerning protected species and sensitive habitats. The proposal also fails to prove compliance with National Planning Framework 4, which includes stipulations regarding biodiversity protection and environmental integrity, as it cannot demonstrate that impacts have been thoroughly assessed or that suitable safeguards are established.

In summary, the combination of an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These flaws obstruct a lawful and robust evaluation of environmental effects, leaving the competent authority unable to make a determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The Environmental Impact Assessment regime requires a thorough assessment of alternatives, which the application fails to provide. Instead of offering a structured and reasoned comparison of realistic alternatives based on their environmental impacts, the application presents a narrative of project evolution. This narrative does not adequately demonstrate that less harmful options have been identified and selected

over more damaging ones.

A lack of transparency and an evidence-based approach is evident in the comparison of alternative offshore locations, development scales, and design configurations. Specifically, there is no indication that the developer has seriously considered positioning turbines further offshore, where visual, ecological, and coastal impacts could be diminished. The sensitivity of the West Lewis coastline highlights the importance of proximity to shore in assessing impact. Therefore, the absence of such analysis prevents any determination that the proposed siting is the least damaging available option.

This inadequacy extends to the assessment of cable routing and landfall, where there is insufficient evidence that alternative routes have been adequately explored to avoid or lessen impacts on sensitive receptors. Areas of cultural and spiritual significance, such as Barvas Cemetery, have not been properly considered. The lack of a clear avoidance strategy and comparative analysis suggests that mitigation by design has not been implemented, relying instead on measures to mitigate impacts after the design phase.

Consequently, the application does not demonstrate that environmental harm has been minimised through appropriate site selection, layout, and routing of infrastructure. This lack of adherence to the established mitigation hierarchy prevents the competent authority from discerning whether less harmful and more suitable alternatives are available. A robust assessment of alternatives is critical, as it cannot be determined that the proposal is a sustainable or policy-compliant solution without it.

From a policy standpoint, these deficiencies compromise adherence to National Planning Framework 4, especially regarding the protection of natural environments, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission, leading to the conclusion that the application has not undergone sufficient evaluation and cannot support a lawful decision.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally flawed and fails to provide a reliable understanding of the ecological receptors in the West Lewis coastal environment. This marine system is not only highly sensitive but also biologically active. Despite this, the baseline data is incomplete and the methodologies employed do not effectively capture species presence, behaviour, and habitat use, ultimately leading to an unreliable foundation for evaluating impacts.

A critical issue pertains to otters, classified as a European Protected Species. The application does not adequately acknowledge or assess their active use of coastal regions for foraging and movement. This oversight regarding their core foraging range and behavioural patterns means that potential effects stemming from construction disturbance, noise, and increased activity have not been thoroughly evaluated. Such deficiencies undermine any conclusions about the absence of significant effects on

otters.

Additionally, the assessment of basking sharks is similarly compromised. The reliance on aerial surveys introduces a significant bias in detection, particularly under Atlantic conditions. This methodology is likely to underestimate the presence of basking sharks when compared to established land-based observations that show frequent use of these waters. The omission of relevant data in this regard leads to an incomplete baseline and diminishes the reliability of the conclusions reached.

These methodological shortcomings imply that any conclusions drawn about negligible or non-significant effects are based more on assumptions than on sound evidence. The lack of adequate baseline data inhibits a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises concerns about the actual scale of risks posed to marine species and their habitats.

From a regulatory standpoint, the application does not fulfil the requirements set by the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainties introduced by these deficiencies prevent the exclusion of adverse effects beyond reasonable scientific doubt, necessitating the application of the precautionary principle. Under these circumstances, granting consent is not legally permissible.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions results in an unreliable assessment. These issues inhibit a thorough evaluation of the 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, characterised by significant gaps in evidence and internal contradictions that seriously undermine its conclusions. The proposed development is situated within critical foraging areas and migratory pathways on the west coast of the Isle of Lewis, which is home to internationally important seabird populations that are already in decline. The applicant fails to demonstrate, to the required evidential standard, that these species will not face adverse impacts.

The assessment exhibits a critical inconsistency; the developer claims there will be no significant adverse effects while also pursuing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This contradiction raises serious doubts about the assessment's reliability and suggests that the conclusions drawn are not underpinned by robust evidence.

Moreover, the assessment lacks sufficient evidence regarding seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, ensuring their protection from adverse effects remains unproven. The importance of these feeding grounds is

inadequately addressed, and the reliance on modelling introduces a level of uncertainty, particularly for species like Kittiwakes and Fulmars, which are in severe decline. The methodologies employed risk underestimating mortality, especially in light of incomplete baseline data and insufficient understanding of behavioural responses.

The siting of turbines within a recognised migratory corridor further exacerbates this situation, as it creates a barrier along a primary flight path for species migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term consequences of ongoing mortality in this corridor, nor does it consider the potential effects on species with relatively small global populations.

Regulatory concerns arise as the application fails to meet the evidential threshold needed to assert there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, combined with data gaps and the limitations of modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This raises the precautionary principle, which precludes a lawful conclusion in favour of consent.

Additionally, the deficiencies noted demonstrate a lack of compliance with National Planning Framework 4 regarding biodiversity protection and the preservation of natural assets. The inability to confirm that internationally important seabird populations will remain unaffected places the proposal at odds with national policy.

In summary, the assessment is deemed unreliable due to its internal inconsistencies, methodological shortcomings, and insufficient evidence. These flaws hinder a thorough evaluation of impacts and lead to the conclusion that the application fails to meet the statutory requirements for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development fails to adequately assess cultural heritage and community identity, particularly concerning the West Lewis coastline, which is a vibrant cultural landscape where environment, language, tradition, and community are deeply intertwined. The application takes a narrow view, treating heritage as isolated, static elements and neglecting their ongoing social, cultural, and spiritual significance within the community.

Significant shortcomings are evident in the handling of culturally important sites like the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active burial grounds and spaces for spiritual practice, yet the assessment reduces them to static features without acknowledging their continued use, significance, and the potential impact of development on their surroundings. This misrepresentation leads to a partial evaluation of cultural effects and dismisses their integral role in community life.

Moreover, the assessment neglects intangible aspects of cultural heritage, such as the Gaelic language, local traditions, and the enduring connection between the community and the coastal environment. These elements are vital to the identity of the area but are

entirely missing from the evaluation, creating a significant gap. Ignoring these factors undermines the ability to fully understand the cultural impact of the proposed development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a unique cultural identity recognised as an Indigenous People, yet the process of Free, Prior and Informed Consent has not been undertaken. The lack of meaningful engagement calls into question the legitimacy of the assessment and fails to honour established principles of participation in matters affecting cultural and environmental interests.

A critical procedural failure is the omission of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. The absence of this assessment prevents the competent authority from fulfilling its legal obligation to examine the social, cultural, and economic impacts on the island community, rendering a lawful determination impossible.

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

In summary, the oversight of living heritage, intangible cultural values, community rights, and statutory obligations creates a considerable evidential gap. The cultural impacts of the development have not been sufficiently evaluated, leaving the application without a solid foundation to assess the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The absence of the complete Social Impact Assessment significantly hinders a thorough evaluation of social impacts, health, and wellbeing, resulting in a lack of transparency that is essential for a lawful review. Although the developer initiated a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This lack of disclosure creates a notable evidential gap, limiting both public awareness and the competent authority's understanding of the social risks uncovered by the developer's own research.

Residents are currently facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts are based on direct engagement and are not speculative. However, without access to the comprehensive assessment, proper scrutiny of the findings is impossible, thereby constraining the ability to evaluate their significance in the decision-making process.

Additionally, the proposal is viewed as a potential threat to community identity and cohesion, with concerns regarding "cultural loss" highlighted in the developer’s findings. Despite this recognition, these social impacts have not been adequately

addressed in the main application or afforded the appropriate consideration. The failure to disclose 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. To fully grasp the social, economic, and health implications of developments of this magnitude, particularly regarding community character and functioning, a complete dataset is vital. The current application does not provide a thorough evidential basis for weighing the benefits against potential harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Development proposals must promote positive health outcomes and avoid adverse impacts. However, the evidence available points to existing detrimental effects that have not been transparently communicated. Without the complete assessment, it is impossible to demonstrate compliance with this policy.

The procedural ramifications are considerable. The competent authority cannot carry out a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This constitutes a material omission in the application, failing to satisfy the evidential standards set by the Environmental Impact Assessment regime.

In summary, the combination of the non-disclosure of the full Social Impact Assessment and evidence of existing adverse impacts results in an incomplete and unreliable assessment. This situation obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual, seascape, and landscape impacts is critically inadequate and fails to reflect both the scale of change and the sensitivity of the environment. The coastline of West Lewis is characterised by its open Atlantic horizon and undeveloped nature, contributing to a strong sense of remoteness. Introducing large-scale turbines near the shoreline would establish a continuous industrial presence, fundamentally altering this character and resulting in a permanent and irreversible transformation of the landscape.

Furthermore, the application does not accurately portray the extent of the visual change. The size and proximity of the turbines would overshadow views from residential areas, historic sites, and popular coastal locations, which would adversely affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment fails to adequately communicate the significance of this impact in relation to such a sensitive landscape.

There are methodological issues concerning the choice and presentation of visual viewpoints. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural

heritage sites and high-value landscapes. This suggests that the magnitude of visual impact could be understated, which calls into question the reliability of the assessment.

Moreover, the assessment overlooks 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 context linked visually and spatially to the Atlantic horizon. By treating these sites as isolated entities, the assessment fails to acknowledge their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would sever these critical connections, altering the context in which heritage assets are experienced and disrupting their relationship with the natural horizon. This situation represents not just a visual impact but a wider cultural and spatial detriment that the application has not sufficiently assessed.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4 in its commitment to protecting natural spaces and historic assets. The scale of change is incompatible with the necessity to preserve landscape character, visual amenity, and the setting of culturally important sites. The lack of a thorough worst-case assessment further weakens any assertions of policy compliance.

It is also evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. The resultant change is fundamental and permanent, rather than something that can be reduced to an acceptable level through mitigation.

In summary, the assessment does not accurately depict the scale of impact, the sensitivity of the environment, or the interconnected nature of landscape and heritage. These shortcomings hinder a reliable evaluation and underscore the conclusion that the proposal is inconsistent with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal raises serious concerns due to its incomplete assessment of construction and pollution risks, which lack the necessary detail to evaluate potential environmental effects. It involves significant seabed preparation and installation works within a dynamic Atlantic environment, yet it does not present fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are to be established after consent, which hampers any meaningful evaluation of their effectiveness or adequacy.

This uncertainty is particularly alarming given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and vital habitats, both of which are susceptible to sediment disturbance and contamination. Although the application acknowledges the risks associated with sediment mobilization and the possibility of accidental chemical or oil spills, it lacks sufficient

detail on prevention, control, or monitoring strategies.

Moreover, there is ambiguity surrounding the scale and behaviour of sediment plumes resulting from the seabed disturbance and cable installation. Without comprehensive modelling and clearly articulated management strategies, it is impossible to ascertain the extent, duration, or ecological implications of these impacts. This uncertainty also extends to the potential effects on already identified sensitive marine species and habitats within the broader assessment.

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

From a regulatory standpoint, the postponement of vital environmental safeguards is at odds with the stipulations of the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation strategies are evaluated prior to granting consent. When critical information is absent, a lawful determination cannot be achieved. Furthermore, the application fails to prove compliance with policy requirements concerning environmental protection and water quality.

Overall, the combination of undefined mitigation measures, a lack of detailed management plans, and the uncertainty surrounding potential impacts renders the assessment significantly 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 assessment of fisheries and marine life provided within the application is inadequate and lacks a thorough evaluation of both ecological and socio-economic impacts. The waters adjacent to 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 habitats and uses can be safeguarded or maintained without significant disruption.

A notable concern is the assertion that fishing activities can be displaced without adverse consequences. The application does not present evidence that alternative fishing grounds are available, accessible, or capable of accommodating any additional pressure that might arise from this displacement. This oversight is critical, as such displacements pose the risk of overfishing in other areas and could have broader economic implications for the local fishing fleet. Without a detailed, evidence-based assessment, the potential impacts on fisheries and local livelihoods remain poorly understood.

Moreover, the proposal poses considerable risks to marine species, particularly due to underwater noise generated during construction activities. The use of high-energy hammer piling for extended periods is expected to disturb marine life across wide areas, with notable impacts on species such as dolphins. The anticipated disturbance to a significant proportion of the local bottlenose dolphin population raises serious concerns, yet the application downplays these effects without providing sufficient supporting evidence.

Furthermore, there is a striking inconsistency within the application. While it acknowledges the necessity for licences to permit harm to European Protected Species, it simultaneously characterises these impacts as negligible. This contradiction undermines the credibility of the assessment and raises questions regarding compliance with the Habitats Regulations, especially where harm is expected to require legal authorisation.

The assessment also neglects to address cumulative impacts that result from various pressures such as habitat disturbance, noise, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is essential for understanding the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It fails to illustrate how the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, which hampers any conclusions about the proposal's sustainability.

In conclusion, the deficiencies noted—including the lack of evidence regarding fishing displacement, an underestimation of acoustic impacts, and internal contradictions—render the assessment incomplete and unreliable. These shortcomings prevent a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents significant concerns regarding the assessment of onshore infrastructure, which is incomplete and does not take into account the full range of impacts from what is a single integrated project. The offshore turbines and onshore works are inherently connected but have been evaluated separately, leading to a fragmented approach that masks 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 near Stornoway, and the necessary access infrastructure through sensitive landscapes. These activities require excavation in areas of deep peat, notably within Barvas Moor, which serves as a crucial carbon store and an ecologically sensitive habitat. However, the application lacks a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental

footprint.

By omitting or delaying the assessment of onshore impacts, the application obstructs an accurate evaluation of cumulative effects. According to the Environmental Impact Assessment process, all project components should be considered collectively. The division of offshore and onshore elements means that the combined effects on peatlands, habitats, and communities are not fully grasped.

Sensitive habitats, such as machair systems and peatland environments, face significant risks that are subject to policy protection. The application fails to prove that the impacts on these habitats have been fully evaluated or that appropriate avoidance measures have been implemented, highlighting an evident gap in relation to biodiversity protection.

Concerns about carbon balance also arise from the proposal. Disturbance of peatland can release stored carbon, potentially creating a carbon debt that undermines the goals of renewable energy development. The application does not sufficiently address this matter or demonstrate that the overall carbon balance remains advantageous.

Furthermore, routing infrastructure through active croft land introduces possible conflicts with current land use and legal rights. There is no evidence provided that the required consents or processes have been initiated, which raises issues regarding the project's deliverability and lawful implementation.

From a policy viewpoint, the failure to assess the project as a whole and to demonstrate the protection of peatlands, habitats, and land use interests conflicts with the National Marine Plan and National Planning Framework 4. The inability to show 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 concerning environmental and land use impacts render this part of the application incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal fundamentally alters the night-time environment along the West Lewis coastline, introducing permanent red aviation lighting that creates a continuous and intrusive “wall of light” effect across the western horizon. This significant change not only impacts visual amenity but also poses a severe risk to the area’s cultural identity and tourism value, particularly in light of the emerging astro-tourism sector, which thrives on the exceptionally dark skies that characterise this region. The application fails to assess how this new lighting affects landscape character or the experience of both residents and visitors, leaving a critical gap in the environmental assessment.

Moreover, the absence of an evaluation concerning the impacts on nocturnal wildlife is alarming. Species such as Manx Shearwater, European Storm Petrel, and Leach’s

Storm Petrel are known to be particularly sensitive to artificial lighting due to phototaxis. The proposal neglects to include any form of lighting impact assessment or phototaxis study, thus failing to evaluate how the aviation lighting might increase the risk of disorientation and collision for these species. This omission is further exacerbated by a reliance on daytime survey data in the ornithological assessment, which does not adequately capture nocturnal activity or associated risks. For instance, Kittiwakes, which may forage or migrate at night, are also vulnerable to disorientation from such lighting, yet this risk has not been addressed.

The lack of site-specific night-time data creates an essential void in understanding the ecological impacts, preventing a determination of whether protected species or designated sites could be adversely affected. The evidential standard needed to exclude adverse effects beyond reasonable scientific doubt remains unmet, thus invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this glaring omission contradicts the National Planning Framework 4, which underscores the importance of protecting natural places and ensuring environmental quality. It also undermines the comprehensive evaluation of landscape and seascape impacts, as the character of night-time environments is an integral component of the overall ecosystem.

In sum, the failure to assess dark skies and nocturnal wildlife results in a significant evidential gap. The absence of baseline data, impact modelling, and species-specific analysis means that the application is incomplete and cannot support a lawful determination.

TOURISM

The application presents a materially deficient assessment regarding the impacts on tourism, failing to evaluate the economic and social ramifications for a crucial sector of the Isle of Lewis economy. The tourism industry relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and its sense of remoteness. While it is acknowledged that 86% of visitors are attracted by the scenery, the assessment lacks a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism has seen significant growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and constitutes up to 16% of the island’s economy. However, the application does not model the potential effects of seascape industrialisation and the loss of environmental quality on Tourism Gross Value Added or the broader economic resilience of the area. Without such crucial analysis, it remains impossible to ascertain whether the proposed development would yield a net economic benefit or detract from an established and burgeoning sector.

Moreover, the assessment inadequately considers the role of environmental quality in underpinning tourism, notably the value of unspoiled landscapes and dark skies to the visitor experience, as well as to emerging sectors such as nature-based tourism and

astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortcoming, creating a significant gap in understanding the impacts on this recognised and expanding aspect of the local economy.

Given the context of an island community with limited economic diversification, the neglect of tourism impacts bears broader implications for employment, local businesses, and the sustainability of the community. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been appropriately evaluated as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not illustrate compliance with National Planning Framework 4, particularly concerning economic impact and the necessary demonstration of net benefit. It also stands in contradiction to strategic objectives that highlight tourism as a priority growth sector, lacking sufficient evidence to enable the competent authority to assess the economic consequences of the proposal adequately.

In summation, the failure to quantify tourism impacts, evaluate environmental drivers of visitor behaviour, and consider the island's economic dependency leads to a significant evidential gap. This hinders a thorough evaluation of the economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The 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.

Additional Comments

Hi

I object.

Totally.

Regards, [Redacted]

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 523A6F51

Member of the public 1068

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection is founded on an analysis of the Environmental Impact Assessment Report and accompanying documents, highlighting significant deficiencies in planning, environmental, cultural, and procedural areas. Situated off the west side of the Isle of Lewis, the location is characterised by its Atlantic-facing coastline, a nearly untouched environment, and a strong cultural identity. The scale, design, and proximity of the proposal raise crucial questions regarding its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis for lawful determination. Key environmental data is absent, baseline information is both limited and inconsistent, and critical elements of the proposal remain unspecified. The flexible design framework used obscures a clear understanding of potential significant effects, while the proposed mitigation measures, which have not been detailed, render it impossible to evaluate their effectiveness. Consequently, the documentation fails to provide a comprehensive or informed understanding of the environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects lack robust evidence.

There are evident and significant conflicts with existing policies. The proposal shows inconsistency with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially regarding biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not demonstrate that national standards for protecting biodiversity, climate interests, and environmental integrity can be achieved. These conflicts directly relate to the statutory tests necessary for consent and compromise the competent authority's ability to determine the proposal's acceptability within policy frameworks.

The scale of the proposed development is unprecedented for this area, featuring large turbines situated near the shoreline, which introduces substantial concerns regarding landscape capacity, visual dominance, and environmental impact. Collectively, the lack of adequate information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. In light of these factors, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a comprehensive, clear, or dependable evaluation of the anticipated environmental impacts stemming from the proposal. The reliance on a flexible Project Design Envelope, which lacks definitive specifications for turbine dimensions, layouts, or configurations, creates significant uncertainty and hinders a consistent application of a worst-case scenario. This compromise undermines the integrity of the assessment, leading to a situation where the impacts detailed may not correspond to the actual development, thus obstructing both public understanding and the competent authority's ability to gauge the true extent of environmental effects.

The application also places considerable emphasis on unrefined mitigation measures, monitoring strategies, and management plans that remain undefined. As a result, consent is sought under the assumption that environmental harm will be rectified at a later stage, rendering any meaningful evaluation of effectiveness or assessment of residual impacts impossible. This postponement of essential information to post-consent phases is procedurally inappropriate and contradicts the fundamental aim of the Environmental Impact Assessment regime, which stipulates that significant effects and mitigations must be clearly delineated prior to determination.

Moreover, there are notable evidential shortcomings, characterised by gaps in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. This leads to uncertainty concerning the scale and significance of impacts, particularly in cases where negligible or non-significant effects are asserted without adequate supporting data. The lack of sufficient information obstructs a clear comprehension of cumulative and worst-case impacts, generating scientific uncertainty that cannot align with statutory obligations.

As a result, the application does not satisfy the evidential standards mandated under the Habitats Regulations, failing to eliminate adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially regarding protected species and sensitive habitats. The proposal also does not show compliance with National Planning Framework 4, which includes provisions for biodiversity protection and environmental integrity, as it cannot be demonstrated that impacts have been thoroughly assessed or that suitable safeguards are established.

In summary, the combination of an undefined design envelope, lack of specified mitigation, and deficiencies in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These inadequacies prevent a lawful and thorough assessment of environmental effects and leave the competent authority unable to make a decision based on the information supplied.

ASSESSMENT OF ALTERNATIVES

The application fails to provide an adequate assessment of alternatives, falling short of the statutory requirements set out by the Environmental Impact Assessment regime. Instead of a structured and reasoned comparison based on environmental effects, it presents a narrative of the project's evolution. This approach does not demonstrate

that less harmful options have been properly identified, assessed, and preferred over more damaging solutions.

There is a notable absence of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. The lack of consideration for placing turbines further offshore, which could potentially reduce visual, ecological, and coastal impacts, is particularly concerning. Given the sensitivity of the West Lewis coastline and the critical role that proximity to shore plays in determining impact, the omission of such analysis undermines any assertion that the proposed siting is the least damaging option.

The inadequacies extend to the assessment of cable routing and landfall, where there is insufficient evidence that alternative routes have been explored adequately to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The absence of a clear avoidance strategy, coupled with a lack of comparative analysis, indicates that mitigation through design has not been considered, relying instead on post-design measures.

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

From a policy standpoint, this deficiency contradicts the principles outlined in National Planning Framework 4, particularly those concerning the protection of natural places, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment constitutes a significant oversight, leading to the conclusion that the application has not been thoroughly evaluated and cannot support a lawful determination.

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment presents significant flaws, characterised by evidence gaps and contradictions that undermine its validity. 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 adequately prove that these species will not be adversely impacted. The development site lies within critical foraging areas and migratory routes, yet the assessment fails to thoroughly evaluate the potential consequences of displacement, collision risk, and habitat loss.

There exists a notable contradiction in the application, as the developer claims no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which should only arise when significant harm is anticipated. This inconsistency casts doubt on the assessment's credibility and suggests that its conclusions lack support from the underlying data. Furthermore, the assessment

inadequately demonstrates that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not fully recognised, and the reliance on modelling introduces uncertainty, particularly concerning species like Kittiwakes and Fulmars that are already in decline. The methodologies employed are likely to underreport mortality, especially where baseline data is lacking and behavioural responses are not completely understood.

The placement of turbines within a recognised migratory corridor significantly increases risk, creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The assessment does not sufficiently consider the long-term impacts of continued mortality in this corridor or the effects on species with relatively small global populations.

From a regulatory standpoint, the application fails to meet the necessary evidential threshold to conclude that there will be no adverse effects on the integrity of protected sites. The presence of conflicting conclusions, along with gaps in data and limitations of modelling, indicates that the standard of beyond reasonable scientific doubt has not been satisfied. This situation invokes the precautionary principle and prevents a lawful conclusion that would support consent.

Moreover, the identified deficiencies illustrate a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally significant seabird populations will not be adversely affected places the proposal in direct opposition to national policy.

In conclusion, the assessment is fundamentally unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. These shortcomings hinder a comprehensive evaluation of impacts and lead to the overall determination that the application does not fulfil the statutory requirements necessary for approval.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity fails to recognise the West Lewis coastline as a living cultural landscape. This landscape is shaped by the connections between the environment, language, tradition, and community. The application reduces heritage to isolated and static assets, neglecting their ongoing social, cultural, and spiritual significance within the community.

Culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas are treated inadequately. These sites serve as active places for burial and spiritual practice. However, they are characterised as static features, which overlooks their continued use and the impact of development on their setting. This mischaracterisation leads to an incomplete evaluation of the cultural effects and ignores their importance in community life.

The assessment also overlooks intangible cultural heritage, which includes the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These factors are central to the area's identity, yet they are entirely absent from the assessment, representing a significant omission. Without considering these elements, the cultural impact of the proposed development cannot be accurately understood.

There are also concerns regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity, recognised as characteristics of an Indigenous People. However, no process of Free, Prior and Informed Consent has been undertaken. The lack of meaningful engagement undermines the legitimacy of the assessment and does not reflect established principles of participation in decisions that affect cultural and environmental interests.

A significant procedural failure is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. This assessment is essential for the competent authority to evaluate the social, cultural, and economic impacts on the island community. Without it, the determination of the application cannot be deemed lawful.

From a policy perspective, the deficiencies in the assessment conflict with National Planning Framework 4, especially concerning the protection of historic assets and places. The failure to acknowledge both tangible and intangible heritage, along with living cultural practices, deviates from policy requirements.

The collective failures to assess living heritage, intangible cultural value, community rights, and statutory obligations create a significant evidential gap. The cultural impacts of the development remain unassessed, and the application does not provide a sufficient basis for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer’s commissioned Social Impact Assessment, which included focus groups with local residents, has not been made fully available to the public. This lack of transparency creates a significant evidential gap, making it impossible for both the public and the competent authority to grasp the complete range of social risks identified by the developer’s own research. The summaries that are accessible suggest that local residents are already suffering measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts, arising from direct engagement, are not speculative. However, without the full assessment being disclosed, there is no opportunity for proper scrutiny, which in turn limits the capacity to assess the significance of these findings within the decision-making framework.

Moreover, there is a clear perception that the proposal threatens community identity and cohesion, with indications of “cultural loss” appearing in the developer’s own findings. Nonetheless, these vital impacts have not been adequately incorporated into the main application nor given the necessary weight. The withholding of the complete

Social Impact Assessment obscures the true human and social costs associated with the development, undermining the overall Environmental Impact Assessment process.

A thorough understanding of social, economic, and health impacts is critical for developments of this magnitude, especially when they may affect community character and functionality. The failure to provide the complete dataset means that the application does not furnish a comprehensive evidential basis to weigh the benefits against potential harms.

From a policy standpoint, this application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Development must promote positive health outcomes and avoid detrimental effects; however, the available evidence suggests existing adverse impacts that remain undisclosed. Without the full assessment, there is no way to confirm compliance with this policy.

The procedural ramifications of this situation are considerable. 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 requirements of the Environmental Impact Assessment framework.

In summary, the non-disclosure of the complete Social Impact Assessment, coupled with evidence of existing adverse effects, renders the assessment incomplete and unreliable. This not only impedes a lawful determination but also reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment concerning seascape, landscape, and visual impacts is significantly lacking and does not sufficiently convey the extent of change or the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by its open Atlantic horizon, undeveloped nature, and pronounced sense of remoteness. The proposed installation of large-scale turbines near the shoreline would introduce a continuous industrial presence that would fundamentally alter this character, leading to a permanent and irreversible change in the landscape.

The application fails to accurately depict the scale of the visual change. Given the dimensions and proximity of the turbines, they are positioned to dominate views from residential areas, historic sites, and frequently visited coastal locations. This dominance would adversely affect visual amenity and diminish the key attributes of naturalness and remoteness. The assessment does not adequately communicate the significance of this impact within the context of such a sensitive landscape.

Methodological issues arise from the selection and presentation of visual viewpoints. There is evidence to suggest that the chosen viewpoints may not accurately represent the most sensitive receptors or the worst-case scenarios, especially in relation to important cultural heritage sites and high-value landscapes. Such a limitation raises

concerns that the true scale of visual impact may be understated, thereby compromising the credibility of the assessment.

Moreover, there is a notable deficiency in the evaluation of the interconnected relationship between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape setting that connects them visually and spatially to the Atlantic horizon. The assessment treats these sites as isolated entities, failing to acknowledge their interdependence, which leads to an incomplete understanding of the impacts on their setting and cultural significance.

The potential industrialisation of the seascape would disrupt these relationships, changing the context in which heritage assets are perceived and severing their link to the natural horizon. This poses not only a visual impact but also a more extensive cultural and spatial detriment that has not been sufficiently evaluated in the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, particularly regarding the preservation of natural places and historic assets. The extent of the proposed changes is incompatible with the obligation to protect landscape character, visual amenity, and the setting of culturally important sites. The lack of a comprehensive worst-case assessment further diminishes any assertions of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would result in a presence that is dominant and unavoidable. Consequently, the change is fundamental and permanent, incapable of being reduced to an acceptable level through mitigation measures.

In conclusion, the assessment fails to accurately portray the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and confirm that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application presents significant shortcomings that raise urgent concerns regarding environmental protection. There is a notable absence of fully developed Construction Environmental Management Plans or Pollution Prevention Plans. This lack of detail hampers the evaluation of likely environmental effects, as the proposal involves extensive seabed preparation and installation works within the challenging conditions of a high-energy Atlantic environment. By relying on undefined future mitigation and contingency measures, the application leaves critical questions about their adequacy and effectiveness unanswered.

Particularly alarming is the potential impact on the West Lewis coastline, which is home to clean coastal waters and vital habitats. These areas are highly sensitive to

disturbances from sediment and contamination. While the application does acknowledge risks associated with sediment mobilisation and possible chemical or oil spills, it fails to adequately outline how these threats will be managed or mitigated. The uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation adds to the urgency of these concerns, as it is impossible to ascertain the ecological effects without comprehensive modelling and management strategies.

Moreover, the lack of clearly defined emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application undermines the ability to evaluate whether suitable safeguards are established to handle potential pollution events. This procedural gap introduces significant risks, making it difficult for the competent authority to assess environmental protection measures at the crucial stage of determination.

From a regulatory standpoint, deferring essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. The assessment of likely significant effects and necessary mitigation must occur prior to consent; without this information, a lawful determination cannot be achieved. Additionally, the application fails to prove compliance with policy requirements concerning environmental protection and water quality.

In summary, the absence of defined mitigation measures, the lack of detailed management plans, and the uncertainty regarding possible impacts render the assessment fundamentally deficient. These issues collectively hinder a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

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

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

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

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

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

TOURISM

The assessment of tourism impacts presented in the application is fundamentally inadequate, neglecting to evaluate the economic and social ramifications for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. The application acknowledges that 86% of visitors are attracted by the scenery but fails to provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution.

Since 2017, tourism has experienced significant growth, rising from £65 million to over £81.5 million, while supporting more than 1,000 jobs and constituting up to 16% of the island's economy. However, the application does not model the potential impacts that the industrialisation of the seascape and the degradation of environmental quality could have on Tourism Gross Value Added or the overall economic resilience of the area. Without this critical analysis, it is impossible to ascertain whether the development would yield a net economic benefit or potentially harm an established and burgeoning sector.

Moreover, the assessment overlooks the essential role of environmental quality in sustaining tourism, including the significance of unspoiled landscapes and dark skies for visitor experience and the growth of emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this deficiency, creating a considerable gap in understanding the impacts on a

recognised and expanding component of the local economy.

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

From a policy standpoint, the application fails to illustrate compliance with National Planning Framework 4, especially regarding economic impact and the necessity to demonstrate net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector and lacks sufficient evidence to enable the competent authority to assess the economic consequences of the proposal.

In summary, the failure to quantify tourism impacts, evaluate the environmental drivers of visitor behaviour, and consider the island's economic dependence results in a significant evidential gap. This deficiency hinders a thorough evaluation of economic effects, leading to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed in terms of sustainable development, failing to meet statutory duties, national policy, and evidential standards. The issues presented echo those that led to the rejection of the Lewis Wind Power proposal in 2008, as the scale of industrialisation was deemed unacceptable. This current application is made under a more stringent policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

Critical gaps exist in the evidential basis for the application, with the use of an undefined design envelope, unspecified mitigation measures, and the omission of significant impact pathways such as nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects. This renders the Environmental Impact Assessment incomplete, hindering a full understanding of potential significant effects and residual impacts.

In terms of procedural integrity, the lack of a compliant Island Communities Impact Assessment breaches the statutory duty established by the Islands (Scotland) Act 2018. Furthermore, the failure to provide a full Social Impact Assessment constitutes a significant omission. These shortcomings hinder the competent authority's ability to evaluate the effects on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal contravenes National Planning Framework 4, as it does not sufficiently protect biodiversity, natural habitats, or cultural heritage. It fails to demonstrate acceptable health and wellbeing impacts and lacks evidence of net economic benefits due to the absence of tourism impact modelling. Additionally, the cumulative impacts

of both offshore and onshore components have not been adequately assessed, obscuring effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties surrounding environmental risks are notable, with incomplete assessments regarding marine ecology, seabirds, protected species, and marine mammals. The evidential threshold required to dismiss adverse effects beyond reasonable scientific doubt is not satisfied, invoking the precautionary principle and preventing a lawful determination of acceptable impacts.

Moreover, the proposal is set to cause significant and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, and the disruption of cultural and visual relationships, alongside adverse impacts on tourism, all represent permanent changes that cannot be sufficiently mitigated.

In conclusion, the application is procedurally and substantively unfit for determination. The extent of informational deficiencies, combined with conflicts with established policy and unresolved environmental risks, obstructs any lawful and evidence-based decision. It is imperative that the competent authority either refuses consent on these grounds or enforces regulatory provisions to compel the submission of the outstanding information. Therefore, it is formally requested that the application for the Spiorad na Mara Offshore Wind Farm be denied in its entirety.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 89464558

Member of the public 1069

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the proposed Spiorad na Mara Offshore Wind Farm. The application has been submitted under the applicable marine licensing and Environmental Impact Assessment regimes. This objection arises from an examination of the Environmental Impact Assessment Report and its associated documents, which reveal significant deficiencies in planning, environmental assessment, cultural considerations, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns have been raised regarding the scale, proximity, and design of the proposal, which challenge its alignment with statutory requirements, national policy, and sustainable development principles.

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

There exist substantive conflicts with established policies. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health and wellbeing. It does not demonstrate compliance with national requirements aimed at safeguarding biodiversity, climate considerations, and environmental integrity. Such conflicts directly affect the statutory tests required for consent, thereby compromising the competent authority's ability to conclude that the development adheres to policy standards.

The scale of the proposed development is unprecedented for this area, with large turbines positioned in close proximity to the shoreline, raising substantial concerns regarding landscape capacity, visual dominance, and environmental ramifications. Collectively, the lack of adequate information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance indicate that the application is incomplete and incapable of sustaining a lawful determination. In light of these circumstances, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally lacking, failing to deliver a comprehensive, clear, or dependable overview of the anticipated environmental repercussions of the proposal. The reliance on a flexible Project Design Envelope, which does not commit to particular turbine dimensions, layouts, or configurations, creates a considerable degree of uncertainty. This uncertainty undermines the reliability of the assessment, meaning that the potential impacts may not accurately reflect the development that will ultimately be built. Consequently, both the public and the competent authority are left without a proper understanding of the true scope of environmental effects.

Moreover, the application places significant emphasis on mitigation measures, monitoring strategies, and management plans that have yet to be established. By seeking consent on the premise that environmental damage will be mitigated later, there is a lack of opportunity for meaningful evaluation of these measures or assessment of any residual impacts. This postponement of crucial information to stages following consent is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which stipulates that likely significant effects and mitigation must be clearly defined before determination.

The report also exhibits serious evidential shortcomings, with gaps in baseline data, limitations in methodology, and an over-reliance on assumptions rather than site-specific evidence. This leads to uncertainties about the scale and significance of impacts, particularly when findings of negligible or non-significant effects are presented without solid supporting data. The insufficient information hinders a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot align with statutory obligations.

As a result, the application does not satisfy the evidential criteria required under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially regarding protected species and sensitive habitats. Furthermore, the proposal does not demonstrate adherence to National Planning Framework 4, including stipulations related to biodiversity protection and environmental integrity, since it cannot be shown that impacts have been thoroughly assessed or that suitable safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specific mitigation, and the deficiencies in baseline data culminate in an Environmental Impact Assessment Report that is neither reliable nor complete. These issues preclude a lawful and rigorous evaluation of environmental effects, leaving the competent authority ill-equipped to make a determination based on the information presented.

ASSESSMENT OF ALTERNATIVES

The application suffers from significant inadequacies in the assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment

regime. Instead of providing a detailed and reasoned analysis of realistic alternatives based on their environmental implications, the submission offers a narrative detailing the evolution of the project. This narrative does not adequately demonstrate that less harmful options have been identified, assessed, and chosen over more damaging alternatives.

Moreover, there is a notable lack of a transparent, evidence-based comparison regarding alternative offshore locations, scales of development, or design configurations. In particular, the application does not convincingly show that the developer has thoroughly considered the possibility of positioning the turbines further offshore, where impacts on visual aesthetics, ecological systems, and coastal areas could potentially be lessened. The sensitivity of the West Lewis coastline highlights the critical nature of proximity to shore in evaluating the impacts; therefore, the absence of this essential analysis raises concerns about whether the proposed siting is truly the least damaging choice.

These deficiencies also extend to the evaluation of cable routing and landfall assessments. There is insufficient evidence to indicate that alternative routes have been adequately examined to avoid or reduce impacts on sensitive receptors, including culturally and spiritually significant sites such as Barvas Cemetery. The lack of a clear strategy for avoidance and the absence of comparative analysis signal a failure to apply mitigation by design, instead relying on post-design measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout considerations, or infrastructure routing. This shortcoming represents a failure to adhere to the established mitigation hierarchy, hindering the competent authority's ability to determine the existence of less harmful and more appropriate alternatives. Without a thorough alternatives assessment, it is impossible to conclude that the proposal is sustainable or compliant with policy.

From a policy standpoint, these deficiencies hinder compliance with National Planning Framework 4, particularly concerning the protection of natural environments, cultural heritage, and the wellbeing of communities. The lack of a structured and comparative assessment constitutes a material omission that leads to the conclusion that the application has not undergone adequate scrutiny and therefore cannot receive lawful approval.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species lacks the necessary comprehensiveness and reliability to accurately reflect the ecological receptors within the West Lewis coastal environment. This area is known for its biological activity and sensitivity, yet the available baseline data is insufficient, and the methodologies employed do not effectively document species presence, behaviour, and habitat use. Consequently, the assessment fails to deliver a credible evidential basis for evaluating potential impacts.

One significant shortfall is related to otters, a European Protected Species. The application neglects to adequately recognise and evaluate their active utilisation of coastal regions for both foraging and movement. Without a proper understanding of their core foraging areas and behavioural patterns, the assessment does not sufficiently address the possible effects of construction-related disturbances, noise, and increased human activity. This oversight compromises the assessment's conclusions regarding the lack of significant effects on otters.

Additionally, the evaluation of basking sharks is flawed due to an over-reliance on aerial surveys, which introduces a substantial detection bias, particularly in the Atlantic's environmental conditions. This method is likely to result in an underestimation of the sharks' presence, especially when compared to established observations from land that show frequent use of these waters. The failure to incorporate or adequately consider this crucial data leads to an incomplete understanding of the baseline and diminishes the reliability of the findings presented.

These methodological shortcomings indicate that conclusions claiming negligible or non-significant effects are grounded in assumptions rather than solid evidence. The lack of adequate baseline data hampers the ability to meaningfully assess cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. This uncertainty raises questions about the actual level of risk posed to marine species and habitats.

From a regulatory viewpoint, the application does not comply with the standards set by the Environmental Impact Assessment regime and the National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainty introduced by these deficiencies prevents the elimination of adverse effects beyond reasonable scientific doubt, invoking the precautionary principle. Under these circumstances, it is clear that consent cannot be lawfully granted.

Overall, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions leads to an unreliable assessment. These issues hinder a robust evaluation of the impacts on marine ecology and protected species, ultimately demonstrating that the application does not possess a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents significant deficiencies regarding the ornithological assessment, raising serious concerns about its reliability. Key evidence gaps and internal inconsistencies challenge the conclusions drawn, particularly given the presence of internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already experiencing decline. The proposal does not adequately demonstrate that these species will not face adverse impacts, despite their crucial presence in key foraging areas and migratory pathways. The assessment fails to thoroughly evaluate critical aspects such as displacement, collision risk, and habitat loss.

Furthermore, a fundamental contradiction within the application arises from the developer's assertion of no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only necessary where significant harm is anticipated. This inconsistency undermines the assessment's reliability and suggests that the findings are not substantiated by the evidence provided. Specifically, 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 grounds is not comprehensively addressed, and the modelling techniques employed add an element of uncertainty, particularly concerning species such as Kittiwakes and Fulmars that are already in severe decline. The methodologies used appear likely to underestimate potential mortality rates, especially given incomplete baseline data and a lack of understanding regarding behavioural responses.

The siting of turbines within a designated migratory corridor further elevates the associated risks, creating a barrier in a primary flight path that is utilised by species migrating between the United Kingdom and Iceland. The application does not sufficiently examine the long-term repercussions 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 satisfy the evidential standard necessary to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, coupled with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation activates the precautionary principle, thereby obstructing a lawful conclusion in favour of consent.

In addition, the identified deficiencies signify a lack of compliance with the National Planning Framework 4 concerning the protection of biodiversity and the safeguarding of natural assets. The failure to demonstrate that internationally significant seabird populations will not be adversely impacted directly contravenes national policy.

Overall, the assessment is deemed unreliable due to its internal inconsistencies, methodological flaws, and lack of robust evidence. These inadequacies hinder a thorough evaluation of potential impacts and collectively support the 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 severely lacking, as it fails to acknowledge the West Lewis coastline as a vibrant cultural landscape where the environment, language, tradition, and community are interconnected. The application adopts a simplistic viewpoint, perceiving heritage merely as a collection of static, isolated assets without recognising their ongoing social, cultural, and spiritual relevance within the community.

Significant shortcomings are evident in how culturally important sites, such as the

cemeteries at Dalmore, Bragar, and Barvas, are treated. These sites serve as active burial places and centres of spiritual practice, yet they are erroneously classified as static features. This oversight neglects their current use, significance, and the potential impact of development on their surroundings. Such mischaracterisation leads to an incomplete assessment of cultural effects, disregarding their importance within community life.

Moreover, the assessment overlooks intangible cultural heritage, including the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These aspects are fundamental to the area's identity but are entirely omitted from the evaluation, leading to a substantial gap in understanding the cultural ramifications of the development.

Concerns are further compounded by issues relating to community rights and participation. The Gaelic-speaking population embodies a distinct cultural identity with attributes recognised as characteristic of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the validity of the assessment and fails to adhere to established principles of participation in decisions that impact cultural and environmental interests.

Additionally, a crucial procedural error is the absence of a proper Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot meet its legal obligation to appraise the social, cultural, and economic impacts on the island community. This omission alone obstructs a lawful decision-making process.

From a policy standpoint, these shortcomings place the proposal in direct opposition to National Planning Framework 4, especially regarding the safeguarding of historic assets and locations. The neglect to consider both tangible and intangible heritage, alongside failing to recognise living cultural practices, constitutes a clear deviation from policy stipulations.

In summary, the inadequacies in assessing living heritage, intangible cultural significance, community rights, and statutory requirements culminate in a substantial evidential void. The cultural impacts of the development have not been adequately evaluated, and the application fails to offer a robust foundation for gauging the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the social impacts, health, and wellbeing associated with the proposed development raises serious concerns regarding the application’s validity. A commissioned Social Impact Assessment involved local residents through focus groups; however, the full report has not been made available. This omission results in a substantial evidential gap, hindering both public understanding and the competent authority’s ability to assess the social risks identified in the developer’s own research.

Available summaries reveal that residents are currently facing tangible stress, anxiety, and concerns due to the scale and proximity of the proposal. These impacts are not speculative, as they stem from direct engagement with the community. Nevertheless, the failure to disclose the complete assessment restricts meaningful scrutiny of the findings, limiting the capacity to gauge their significance in the decision-making process.

Furthermore, the proposal is viewed as a threat to community identity and cohesion, with “cultural loss” highlighted in the developer’s findings. Despite this recognition, these critical impacts have not been adequately incorporated into the main application, nor have they been given the necessary weight in deliberations. The withholding of the full Social Impact Assessment consequently obscures the true human and social costs that could arise from the development.

This lack of disclosure not only undermines the Environmental Impact Assessment process but also prevents a comprehensive understanding of the social, economic, and health implications of such a large-scale development, particularly regarding its effect on community character and functioning. The absence of the full dataset means the application fails to provide a complete evidential basis for balancing potential benefits against harm.

From a policy perspective, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Developments should foster positive health outcomes and avert harm, yet the available evidence points to existing adverse effects that remain inadequately disclosed. Without the complete assessment, compliance with this policy cannot be confirmed.

Procedurally, the implications are considerable. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the entire Social Impact Assessment. This represents a material omission in the application and fails to satisfy the evidential requirements of the Environmental Impact Assessment regime.

Collectively, the non-disclosure of the full Social Impact Assessment, along with evidence of current adverse impacts, results in an incomplete and unreliable assessment. This inadequacy hinders a lawful determination and underscores the conclusion that the application is unsupported by sufficient information.

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 in close proximity to the shoreline would create a continuous industrial presence that fundamentally alters this character, resulting in a permanent and irreversible transformation of the landscape. The assessment of seascape, landscape, and visual impacts is materially deficient, as it fails to adequately reflect the

scale of change or the sensitivity of the receiving environment.

The application does not accurately convey the magnitude of the visual change. The scale and proximity of the turbines mean they would dominate views from residential areas, historic sites, and frequently used coastal locations. This dominance would directly impact visual amenity and erode the defining qualities of naturalness and remoteness. The assessment does not sufficiently communicate the significance of this impact within such a sensitive landscape context.

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

Another significant shortcoming is the failure to assess the interconnected relationship between landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a wider landscape setting, visually and spatially linked to the Atlantic horizon. Treating these as isolated assets instead of recognising their interdependence leads to an incomplete evaluation of the impacts on their setting and cultural significance. The industrialisation of the seascape would sever these relationships, altering the context in which heritage assets are experienced and disrupting their connection to the natural horizon. This presents not only a visual impact but also broader cultural and spatial harm that the application has not sufficiently assessed.

From a policy perspective, the proposal directly conflicts with National Planning Framework 4 regarding the protection of natural places and historic assets. The scale of change is incompatible with the requirement to safeguard landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the absence of a robust worst-case assessment undermines any claims 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 dominant and unavoidable. Consequently, the resulting change is fundamental and permanent, rather than capable of being reduced to an acceptable level through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal involves significant seabed preparation and installation works set against a high-energy Atlantic environment. However, the assessment of construction and

pollution risks is lacking, failing to deliver the necessary detail to evaluate likely environmental effects. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included in the application. Instead, it relies on mitigation and contingency measures that are to be prepared after consent, which hinders any meaningful assessment of their adequacy or effectiveness.

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

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

The lack of detailed emergency response procedures further exacerbates these issues. By postponing contingency planning to a post-consent stage, the application inhibits the evaluation of whether suitable safeguards are in place to address pollution events. This introduces procedural risks and undermines the ability of the competent authority to assess environmental protection measures during the determination process.

From a regulatory standpoint, the deferral of critical environmental safeguards contradicts the requirements established by the Environmental Impact Assessment regime. Likely significant effects and mitigation strategies must be evaluated prior to consent, and when this information is absent, a lawful determination cannot be achieved. Additionally, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The proposal presents significant shortcomings in its assessment of the marine environment and fisheries, which are critical to both local ecology and economy. The West Lewis coast is home to a varied marine ecosystem and supports an active fishing industry, yet the application does not adequately address how these vital uses and habitats will be preserved without considerable disruption.

One major concern is the assumption that fishing activities can be shifted without negative repercussions. There is no evidence provided to suggest that alternative fishing grounds exist that are accessible and capable of absorbing the additional pressure resulting from displacement. This critical gap in information raises the risk of overfishing in other areas, potentially leading to wider economic ramifications for the local fishing fleet. Consequently, without a detailed, evidence-based assessment, the potential impacts on fisheries and livelihoods remain poorly understood.

Moreover, the proposal poses serious risks to marine species, particularly due to the underwater noise associated with construction activities. The prolonged use of high-energy hammer piling is anticipated to create disturbances over extensive areas, adversely affecting marine life, including dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is a serious concern, yet the application minimizes these potential effects and lacks sufficient supporting evidence for such claims.

An inconsistency in the application arises from the acknowledgment of the need for licenses to allow harm to European Protected Species while simultaneously claiming that the impacts are negligible. This contradiction raises doubts about the validity of the assessment and casts a shadow over compliance with the Habitats Regulations, especially where harm is predicted to an extent that necessitates legal authorization.

Additionally, the cumulative impacts resulting from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities, are not sufficiently considered. A comprehensive evaluation of these combined effects is essential for understanding the overall impact on marine ecosystems and socio-economic conditions.

From a policy perspective, the application falls short of demonstrating compliance with the National Planning Framework 4 and the National Marine Plan. It does not convincingly establish that the proposed development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, thereby hindering any assertion 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 inconsistencies within the application collectively render the assessment both incomplete and unreliable. These deficiencies obstruct a thorough evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal presents significant issues regarding the evaluation of onshore infrastructure, which is not fully addressed. This is a single integrated project, yet the assessment treats the offshore turbines and onshore works separately, leading to a fragmented understanding of the environmental and socio-economic impacts.

The onshore aspects include cabling across protected moorland, the construction of a substation near Stornoway, and access infrastructure that traverses sensitive landscapes. Excavation activities in these areas, especially on Barvas Moor, disrupt deep peat which is an important carbon store and an ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, limiting the understanding of the project's total environmental footprint.

By not considering onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all project components be considered collectively. However, the separation of onshore and offshore elements results in an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

There are substantial risks posed to sensitive habitats, including machair systems and peatland environments that benefit from policy protection. The application fails to show that impacts on these habitats have been comprehensively assessed or that effective avoidance measures have been taken, creating a significant evidential gap concerning biodiversity protection.

Moreover, the routing of infrastructure through active croft land presents potential conflicts with existing land use and legal rights. There is no evidence provided that the required consents or processes have been initiated, which raises doubts about the feasibility and lawful execution of the project.

From a policy viewpoint, the lack of a unified assessment of the project and the failure to demonstrate the protection of peatlands, habitats, and land use interests contradicts the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated significantly weakens the application.

In summary, the division of project components, the absence of a comprehensive assessment, and the lack of evidence on environmental and land use impacts make this aspect of the application incomplete and unreliable, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment is deficient as it does not include an evaluation of dark skies and nocturnal wildlife. The West Lewis coastline is known for its exceptionally dark skies, which are essential to the area's environmental quality, cultural identity, and tourism potential. The proposal would introduce permanent red aviation lighting that would be visible over considerable distances, creating a continuous and intrusive "wall of light" effect on the western horizon, thereby fundamentally altering the night-time environment.

Furthermore, the application fails to consider the lighting's impact on visual amenity, landscape character, or the experiences of both residents and visitors. This oversight is particularly concerning given the significance of dark skies to the region’s identity and

the emerging tourism sector, including astro-tourism. As a result, there is a substantial gap in the landscape and environmental assessment.

Equally important is the lack of evaluation concerning nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be sensitive to artificial lighting due to phototaxis, which can cause disorientation and increase the risk of collisions. The application does not incorporate any assessment of lighting impact or conduct a phototaxis study to examine the potential effects of aviation lighting on these species and the associated mortality risks.

The situation is exacerbated by the use of daytime survey data in the ornithological assessment, which fails to account for nocturnal activity or related risks. For example, Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, a threat that has not been evaluated. The absence of site-specific night-time data represents a critical gap in understanding the ecological impacts.

Without an assessment of nocturnal effects, 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 is not met, invoking the precautionary principle and hindering a lawful determination.

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

In summary, the lack of any assessment of dark skies and nocturnal wildlife reveals a significant evidential gap. The deficiencies in baseline data, impact modelling, and species-specific analysis render the application incomplete and incapable of securing a lawful determination.

TOURISM

The proposal presents a serious deficiency in assessing tourism impacts, neglecting to evaluate the economic and social ramifications for a crucial sector of the Isle of Lewis economy. The success of tourism is inherently linked to the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. While the application recognises that 86% of visitors are motivated by the scenery, it fails to provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution.

Tourism on the island has seen substantial growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and represents up to 16% of the island's economy. Despite this growth, the application does not explore how the industrialisation of the seascape and the deterioration of environmental quality would affect Tourism Gross Value Added or the broader economic resilience of the area. In the absence of such analysis, it remains unclear whether the development would yield a

net economic benefit or jeopardise a well-established and expanding sector.

Additionally, the assessment overlooks the significance of environmental quality in enhancing tourism, particularly regarding unspoiled landscapes and dark skies, which are essential for visitor experiences and emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this issue, resulting in a significant gap in understanding impacts on an acknowledged and growing component of the local economy.

Given the context of an island community with limited economic diversification, the failure to assess tourism impacts holds broader implications for employment, local enterprises, and community sustainability. The omission of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been evaluated, as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, especially concerning economic impact and the necessity to show net benefit. It also contradicts strategic objectives that classify tourism as a priority growth sector and lacks adequate evidence to enable the competent authority to evaluate the economic consequences of the proposal.

Collectively, the shortcomings in quantifying tourism impacts, assessing environmental influences on visitor behaviour, and acknowledging the island's economic dependency create a considerable evidential gap. This absence hampers a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development as stipulated by statutory duties, national policy, and evidential standards. It echoes the primary concerns that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. This current application is submitted under a policy framework that ostensibly strengthens the emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it still falls short.

A critical examination reveals that the application lacks a complete and reliable evidential basis for determination. Significant gaps in baseline data exist, alongside the continued use of an undefined design envelope. The reliance on unspecified mitigation measures and the exclusion of crucial impact pathways, particularly relating to nocturnal wildlife, the full extent of onshore infrastructure, and potential tourism effects, leave the Environmental Impact Assessment incomplete. This inadequacy precludes a comprehensive understanding of likely significant effects or residual impacts.

Moreover, clear procedural shortcomings are present. The absence of a compliant

Island Communities Impact Assessment signifies a breach of statutory duty under the Islands (Scotland) Act 2018. Additionally, the failure to provide a complete Social Impact Assessment is a serious omission. These inadequacies inhibit the competent authority from evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal stands in stark contradiction to the National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural spaces, and cultural heritage. Furthermore, it fails to establish that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, largely due to insufficient tourism impact modelling. The cumulative effects of both offshore and onshore components have not been appropriately assessed, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and occasionally inconsistent. The necessary evidential standard to dismiss adverse effects beyond reasonable scientific doubt has not been satisfied, necessitating the application of the precautionary principle and barring a lawful conclusion regarding acceptable impacts.

Furthermore, the proposal would induce substantial and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual relationships, and the adverse effects on tourism represent permanent changes that cannot be effectively mitigated.

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

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 19A01DF6

Member of the public 1070

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the proposed Spiorad na Mara Offshore Wind Farm. The application has been submitted under the applicable marine licensing and Environmental Impact Assessment regimes. This objection arises from an examination of the Environmental Impact Assessment Report and its associated documents, which reveal significant deficiencies in planning, environmental assessment, cultural considerations, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns have been raised regarding the scale, proximity, and design of the proposal, which challenge its alignment with statutory requirements, national policy, and sustainable development principles.

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

There exist substantive conflicts with established policies. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health and wellbeing. It does not demonstrate compliance with national requirements aimed at safeguarding biodiversity, climate considerations, and environmental integrity. Such conflicts directly affect the statutory tests required for consent, thereby compromising the competent authority's ability to conclude that the development adheres to policy standards.

The scale of the proposed development is unprecedented for this area, with large turbines positioned in close proximity to the shoreline, raising substantial concerns regarding landscape capacity, visual dominance, and environmental ramifications. Collectively, the lack of adequate information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance indicate that the application is incomplete and incapable of sustaining a lawful determination. In light of these circumstances, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant shortcomings and lacks a complete, transparent, and reliable evaluation of the potential environmental effects of the proposal. The introduction of a flexible Project Design Envelope, which lacks specific commitments to turbine dimensions, layouts, or configurations, creates considerable uncertainty and obstructs the consistent application of a worst-case scenario. This situation compromises the integrity of the assessment, making it impossible for both the public and the competent authority to grasp the true extent of environmental impacts that may arise from the development as ultimately constructed.

Additionally, the application heavily depends on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent based on the premise that environmental damage will be managed later hinders any meaningful evaluation of the effectiveness of these measures and the assessment of residual impacts. This postponement of essential information to post-consent phases is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which mandates that likely significant effects and mitigation strategies be clearly established prior to decision-making.

Furthermore, there are notable evidential inadequacies, including lapses in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. These issues lead to uncertainty regarding the magnitude and significance of impacts, particularly where claims of negligible or non-significant effects are made without robust supporting data. The lack of adequate information hampers a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot align with statutory obligations.

Consequently, the application does not fulfil the evidential requirements set forth under the Habitats Regulations, failing to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and vulnerable habitats. Moreover, the proposal does not demonstrate adherence to National Planning Framework 4, specifically concerning biodiversity protection and environmental integrity, as it cannot verify that impacts have been thoroughly assessed or that appropriate safeguards have been established.

In summary, the combination of reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data collectively undermine the reliability and completeness of the Environmental Impact Assessment Report. These deficiencies obstruct a lawful and thorough assessment of environmental effects, rendering the competent authority incapable of making a well-informed determination based on the information supplied.

MARINE ECOLOGY AND PROTECTED SPECIES

The coastal environment of West Lewis is a biologically active and sensitive marine system. However, the assessment of marine ecology and protected species lacks

completeness and reliability. The data collected is insufficient, and the methods used do not effectively capture the presence, behaviour, and habitat use of species within this area. Consequently, the assessment fails to provide a solid basis for evaluating potential impacts.

A significant gap in the assessment concerns otters, which are recognised as a European Protected Species. The application does not adequately acknowledge their use of coastal areas for foraging and movement. Without considering their core foraging range and behaviour, the potential impacts of construction disturbances, noise, and increased human activity remain unassessed. This oversight casts doubt on the conclusions drawn regarding the absence of significant effects on otters.

Additionally, the assessment of basking sharks suffers from reliance on aerial surveys that introduce a considerable detection bias, particularly in Atlantic conditions. This methodology is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that show these waters are frequently used. The failure to integrate or properly assess such data results in an incomplete baseline and undermines the reliability of the conclusions.

These methodological shortcomings lead to findings of negligible or non-significant effects being based more on assumptions than on solid evidence. The lack of adequate baseline data hinders the assessment of cumulative and indirect impacts, such as seasonal changes and broader ecosystem interactions. This creates uncertainty about the actual risk to marine species and their habitats.

From a regulatory standpoint, the application does not adhere to the standards set by the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify and assess protected species. The uncertainty that arises prevents the dismissal of adverse effects with reasonable scientific confidence, which necessitates the application of the precautionary principle. Therefore, consent for the project cannot be lawfully granted.

Overall, the incomplete baseline data, flawed methodologies, and unsupported conclusions render the assessment unreliable. These deficiencies obstruct a thorough evaluation of the impacts on marine ecology and protected species, leading to the conclusion that the application lacks an adequate evidential foundation.

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.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The application lacks a thorough assessment of seascape, landscape, and visual impacts, failing to reflect the true scale of change or the sensitivity of the environment. The West Lewis coastline is characterised by its unspoiled Atlantic horizon and an overwhelming sense of remoteness. The proposed large-scale turbines, situated close to the shoreline, would create a persistent and dominating industrial presence, fundamentally transforming this unique character and resulting in permanent and

irreversible changes to the landscape.

Furthermore, the visual impact is not represented adequately within the application. The size and proximity of the turbines would overshadow views from residential areas, historic locations, and popular coastal sites, thereby directly affecting visual amenity and undermining the essential qualities of naturalness and remoteness. The assessment does not convey the significance of this impact within the context of such a sensitive landscape.

Concerns also arise regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This introduces the risk that the visual impact has been understated, casting doubt on the assessment's reliability.

Another critical shortcoming is the lack of evaluation regarding the interconnected relationships between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape setting, connected by visual and spatial relationships to the Atlantic horizon. The assessment isolates these heritage assets, ignoring their interdependence and leading to an incomplete understanding of the impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are perceived and severing their bond with the natural horizon. This represents not just a visual impact but a wider cultural and spatial harm that the application fails to adequately assess.

From a policy perspective, the proposal directly contradicts National Planning Framework 4 regarding the safeguarding of natural places and historic assets. The magnitude of change is incompatible with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case assessment further weakens any assertion of compliance with policy requirements.

It is evident that the identified impacts cannot be effectively mitigated. Given the size, height, and proximity of the turbines, their presence would be overwhelming and unavoidable. The resulting change is therefore fundamental and permanent, not something that can be reduced to an acceptable level through mitigation.

In summary, the assessment does not accurately capture the extent of the impact, the sensitivity of the environment, or the interconnected nature of landscape and heritage. These deficiencies impede a reliable evaluation and underscore the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application presents significant deficiencies in the assessment of construction and pollution risks, lacking the necessary detail to properly evaluate potential environmental impacts. It proposes extensive seabed preparation and installation works in a high-energy Atlantic environment without providing fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on the preparation of mitigation and contingency measures after consent has been granted, which obstructs any substantial assessment of their adequacy or effectiveness.

This approach raises particular concerns given the sensitivity 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. Although the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it fails to detail how these risks will be effectively prevented, controlled, or monitored.

Moreover, there exists uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation activities. In the absence of robust modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of such disturbances. This uncertainty also pertains to the potential effects on marine species and habitats identified as sensitive in the broader assessment.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning to a post-consent stage, the application undermines the ability to assess whether appropriate safeguards are established to address pollution events. This situation introduces procedural risk and hinders the competent authority's capacity to evaluate environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contravenes the requirements set forth in the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation strategies be assessed prior to consent, and any absence of such information precludes a lawful determination. Furthermore, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry, both of which are at risk from the proposed development. The

application fails to provide a thorough evaluation of the ecological and socio-economic impacts, particularly regarding fisheries and marine life. A key concern is the assumption that fishing activities can be displaced without adverse consequences. There is no evidence presented that alternative fishing grounds are available, accessible, or capable of absorbing any additional pressure. This is a critical omission, as it raises the potential for overfishing in other areas, which could have detrimental economic effects on the local fishing fleet. Without a robust and evidence-based assessment, it is impossible to fully understand the implications for fisheries and the livelihoods dependent on them.

Moreover, the proposal poses significant risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling for an extended period is likely to disturb marine life over large distances, notably affecting local species such as dolphins. The application underestimates the impact on a considerable portion of the local bottlenose dolphin population, raising serious concerns, yet it fails to provide sufficient evidence to support its conclusions regarding these effects.

There are clear inconsistencies within the application, as it acknowledges the need for licences to permit harm to European Protected Species, while simultaneously categorising the impacts as negligible. This contradiction calls into question the credibility of the assessment and raises serious concerns regarding compliance with the Habitats Regulations, especially where potential harm necessitates legal authorisation.

Furthermore, the assessment overlooks cumulative impacts arising from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a comprehensive evaluation of these combined effects, it is impossible to determine the overall impact on marine ecosystems and socio-economic conditions.

From a policy perspective, 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, which prevents any conclusion that the proposal represents sustainable development.

In summary, the deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the application result in an assessment that is incomplete and unreliable. These shortcomings hinder a robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The evaluation of the onshore infrastructure associated with this project is significantly inadequate and fails to account for the comprehensive impacts linked to what is fundamentally a single integrated initiative. The offshore turbines and the associated

onshore works are fundamentally connected, yet they are analysed in isolation, leading to a disjointed approach that conceals the true magnitude of environmental and socio-economic ramifications.

The onshore components entail cabling traversing protected moorland, the establishment of a substation close to Stornoway, and the necessary access infrastructure through delicate landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, a crucial carbon store and ecologically fragile habitat. The application lacks a thorough assessment of these effects, obstructing a complete understanding of the project's overall environmental impact.

By omitting or postponing the assessment of onshore consequences, the application hinders a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all facets of a project be considered collectively, yet the division between offshore and onshore components means the aggregate impacts on peatlands, habitats, and local communities remain unclear.

There are also considerable risks to sensitive habitats, such as machair systems and peatland environments, which enjoy policy protection. The application does not adequately show that impacts on these habitats have been fully evaluated or that suitable avoidance measures have been implemented. This represents a significant evidential deficiency concerning biodiversity protection.

Furthermore, the routing of infrastructure through active croft land presents possible conflicts with existing land use and legal rights. The application fails to provide evidence that the requisite consents or procedures have been initiated, raising doubts about the project's feasibility and lawful execution.

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

Collectively, the separation of project elements, the absence of a comprehensive evaluation, and the lack of supporting evidence regarding environmental and land use impacts render this section of the application incomplete and unreliable, preventing a lawful determination.

TOURISM

The application fails to adequately assess the impacts on tourism, a key sector for the Isle of Lewis economy, and does not evaluate the economic and social consequences associated with this area. Tourism in the region relies heavily on its wild coastline, near-pristine landscape, dark skies, and sense of remoteness. Although the application acknowledges that 86% of visitors are attracted by the scenery, it provides no quantified assessment of how large-scale offshore infrastructure might affect visitor numbers, behaviour, or the overall economic contribution of this sector.

Tourism has seen remarkable growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. However, the application does not model the potential impacts of the industrialisation of the seascape and the resultant loss of environmental quality on Tourism Gross Value Added or the broader economic resilience of the island. The lack of such analysis hinders the ability to ascertain whether the proposed development would yield a net economic benefit or harm this vital and expanding sector.

Furthermore, the assessment neglects the significant role of environmental quality in underpinning tourism, including the critical nature of unspoiled landscapes and dark skies for visitor experience, as well as the emerging markets of nature-based tourism and astro-tourism. The omission of a Dark Skies Assessment only exacerbates this inadequacy, creating a considerable gap in understanding the impacts on this recognised and growing part of the local economy.

In an island community that faces limited economic diversification, the oversight regarding tourism impacts raises broader concerns for employment, local businesses, and community sustainability. Additionally, the absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been evaluated as stipulated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, particularly concerning economic impacts and the necessity to exhibit net benefits. It also contradicts strategic objectives that prioritise tourism as a growth sector, lacking sufficient evidence for the competent authority to effectively assess the economic ramifications of the proposal.

In summary, the failure to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and acknowledge the island's economic dependency leads to a significant evidential gap. This shortcoming prevents a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal constitutes a significant failure to meet the requirements of sustainable development as outlined 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 scale of industrialisation was deemed unacceptable. Despite now being evaluated under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application remains fundamentally flawed.

A reliable evidential basis for determination is lacking, with critical gaps in baseline data and an undefined design envelope. The reliance on unspecified mitigation measures and the omission of key impact pathways, such as effects on nocturnal wildlife, complete onshore infrastructure, and tourism, indicate that the Environmental

Impact Assessment is incomplete. This insufficiency prevents a comprehensive understanding of potential significant effects or residual impacts.

Procedural failures are evident, including the absence of a compliant Island Communities Impact Assessment, which breaches statutory duties under the Islands (Scotland) Act 2018. Additionally, the lack of a full Social Impact Assessment represents a material omission. These shortcomings hinder the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

Moreover, the proposal stands in direct contradiction to the National Planning Framework 4. It does not demonstrate adequate protection of biodiversity, natural places, and cultural heritage, nor does it show that the impacts on health and wellbeing are acceptable. Furthermore, the absence of tourism impact modelling precludes evidence of a net economic benefit. The assessment of cumulative impacts involving both offshore and onshore components has not been sufficiently conducted, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainty remains around environmental risks, particularly concerning marine ecology, seabirds, protected species, and marine mammals. Incomplete and internally inconsistent assessments have failed to meet the evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt. This engages the precautionary principle, making it impossible to lawfully conclude that impacts are acceptable.

Substantial and irreversible changes to a highly sensitive landscape would result from this proposal. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual relationships, and negative impacts on tourism are all permanent effects that cannot be adequately mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The combination of information deficiencies, policy conflicts, and unresolved environmental risks prevents a lawful and evidence-based decision. The competent authority must refuse consent on these grounds or require the submission of the missing information through relevant regulatory provisions.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 45F52E16

Member of the public 1071

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The basis for this objection stems from a review of the Environmental Impact Assessment Report and accompanying documentation, highlighting significant planning, environmental, cultural, and procedural deficiencies.

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

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

Moreover, there are substantial conflicts with policy. The proposal appears at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. These conflicts directly impact the statutory tests required for consent, undermining the competent authority's ability to assess the development as acceptable in policy terms.

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report suffers from significant deficiencies, leading to an incomplete and unreliable understanding of the potential environmental effects associated with the proposal. The flexibility of the Project Design Envelope, which lacks commitment to precise turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This lack of specificity hinders the application of a worst-case scenario, thereby compromising the assessment's integrity and preventing both the public and competent authorities from fully grasping the true extent of the environmental impacts.

Moreover, the application places substantial reliance on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent under the premise that environmental harm will be mitigated later obstructs any meaningful evaluation of effectiveness and the assessment of residual impacts. This deferral of crucial information to post-consent stages is procedurally inappropriate and conflicts with the objectives of the Environmental Impact Assessment framework, which necessitates that significant effects and mitigation strategies be clearly identified before determination.

The report also exhibits severe evidential shortcomings, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. Such deficiencies result in uncertainty regarding the scale and significance of impacts, especially where negligible or non-significant conclusions are drawn without robust supporting data. This lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that fails to meet statutory requirements.

Consequently, the application does not fulfil the evidential criteria set out in the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially regarding protected species and sensitive habitats. Additionally, the proposal does not align with the National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it has not been demonstrated that impacts have been adequately assessed or that suitable safeguards are established.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of landscape, seascape, and visual impacts is significantly inadequate and does not reflect the scale of change or the sensitivity of the local environment. The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and profound sense of remoteness. The introduction of large turbines near the

shoreline would establish a continuous industrial presence that would fundamentally alter this character, leading to a permanent and irreversible transformation of the landscape.

The application does not sufficiently address the magnitude of this visual change. The size and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment fails to accurately convey this level of impact or its significance within such a sensitive landscape.

Moreover, there are methodological issues concerning the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not fully capture the most sensitive receptors or the worst-case scenarios, particularly regarding key cultural heritage sites and valuable landscapes. This raises concerns that the visual impact's magnitude may have been understated, thus compromising the reliability of the assessment.

Another notable deficiency is the lack of consideration for the interconnected relationship between landscape, seascape, and cultural heritage. Significant sites like the Calanais Standing Stones and other Scheduled Monuments are integrated within a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these heritage assets in isolation, ignoring their interdependence and resulting in an incomplete evaluation of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal contradicts National Planning Framework 4 concerning the protection of natural places and historic assets. The extent of change is at odds with the need to safeguard landscape character, visual amenity, and the setting of culturally significant sites. The lack of a comprehensive worst-case assessment further diminishes any assertion 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 overwhelmingly dominant 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 represent the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and reaffirm the conclusion that the proposal is incompatible with the protection of this landscape.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are a vital aspect of the area's environmental quality, cultural identity, and tourism appeal. However, the proposal introduces permanent red aviation lighting that would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment. This significant alteration is not addressed in the application, which fails to evaluate the impact of such lighting on visual amenity, landscape character, or the experiences of residents and visitors. Given the increasing importance of dark skies to the area's identity and to burgeoning sectors like astro-tourism, this omission creates a clear gap in the overall landscape and environmental assessment.

Moreover, there is no consideration of the effects on nocturnal wildlife, which is critical. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to phototaxis, a phenomenon that can lead to disorientation and heightened collision risks. The absence of a lighting impact assessment or a phototaxis study means the application neglects to evaluate how aviation lighting may affect these species or contribute to their mortality rates. Additionally, the ornithological assessment relies solely on daytime survey data, overlooking nocturnal activity and associated dangers. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this danger has not been examined. The lack of site-specific night-time data results in a critical gap in understanding the ecological impacts of the proposal.

Without a thorough assessment of these nocturnal effects, it is impossible to ascertain whether protected species or designated sites could be adversely impacted. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and hindering a lawful determination. Furthermore, the failure to address these issues conflicts with National Planning Framework 4 regarding the protection of natural places and environmental quality. It also undermines the overall evaluation of landscape and seascape impacts, as the character of night-time is an integral part of the environment.

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

TOURISM

The tourism sector on the Isle of Lewis has seen remarkable growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and represents up to 16% of the island's economy. However, the application under review lacks a crucial assessment of the tourism impacts, failing to evaluate the economic and social ramifications for this vital sector. Tourism is intrinsically linked to the area's wild coastline, near-pristine landscape, dark skies, and overall sense of remoteness.

While the application notes that 86% of visitors are attracted by the scenery, it does not provide a quantified analysis of how large-scale offshore infrastructure may alter visitor numbers, behaviours, or their overall economic contribution.

The assessment neglects the importance of environmental quality in sustaining tourism, particularly regarding the appeal of unspoiled landscapes and dark skies to enhance visitor experience. The lack of a Dark Skies Assessment exacerbates this deficiency, creating a significant gap in understanding the potential impacts on nature-based tourism and astro-tourism, which are emerging markets. Furthermore, the failure to model how the industrialisation of the seascape and loss of environmental quality could impact Tourism Gross Value Added or the overall economic resilience signifies a serious oversight. Without this analysis, it is impossible to ascertain if the development would yield a net economic benefit or, conversely, undermine an established and growing sector.

In the context of an island community characterised by limited economic diversification, this oversight carries broader implications for local employment, businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been evaluated as mandated by the Islands (Scotland) Act 2018. From a policy standpoint, the application fails to illustrate compliance with National Planning Framework 4, particularly concerning economic impact and the necessity to demonstrate net benefit. It also contradicts strategic objectives that recognise tourism as a priority growth sector and does not furnish adequate evidence for the competent authority to assess the economic implications of the proposal.

Collectively, the lack of quantification of tourism impacts, the disregard for environmental factors influencing visitor behaviour, and the neglect of the island's economic dependencies culminate in a significant evidential gap. This prevents a thorough evaluation of the economic effects and leads to the conclusion that the application is fundamentally incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development as defined by statutory duties and national policy. It echoes the issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This new application is positioned under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it still falls short.

A significant concern is the absence of a comprehensive and reliable evidential basis for the application’s determination. Critical gaps exist in baseline data, and the continued reference to an undefined design envelope raises questions. Mitigation measures mentioned are not specified, and important impact pathways, such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism, have been

overlooked. Consequently, the Environmental Impact Assessment remains incomplete, hindering an understanding of potential significant effects and residual impacts.

The procedural shortcomings are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018. Furthermore, the non-disclosure of the complete Social Impact Assessment is a material omission that inhibits the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These failures collectively render the application unsuitable for determination.

Additionally, the proposal contradicts the National Planning Framework 4 by failing to demonstrate adequate protection of biodiversity, natural landscapes, and cultural heritage. It does not provide evidence that health and wellbeing impacts are acceptable, nor does it demonstrate a net economic benefit due to the lack of tourism impact modelling. Moreover, the cumulative effects of both offshore and onshore components have not been thoroughly assessed, obscuring their implications for peatlands, carbon balance, habitats, and crofting land.

Uncertainties regarding environmental risks remain significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The evidential threshold required to demonstrate the absence of adverse effects beyond reasonable scientific doubt has not been fulfilled, invoking the precautionary principle and obstructing a lawful determination that impacts are acceptable.

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

In summary, the application is procedurally and substantively unfit for determination. The scale of information deficiencies, alongside policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. Therefore, the competent authority should refuse consent based on these grounds or employ the relevant regulatory measures to demand the submission of the necessary information.

Thus, 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 am utterly distraught at the idea of the West Coast of Lewis being ruined forever by this wholly unsuitable development. It beggars belief to site massive wind turbines so close to shore and especially on a coastline of geological significance and unspoilt natural beauty. Of course it would be devastating to wildlife too and the dark sky status of the West Coast would be shattered - and every sunset sky from now on too - by the tall,

flashing red lights of the wind turbines. Lewis and Harris can wave goodbye to tourism and the very necessary funds that it brings.
This anything-but-green development amounts to ecocide on an unprecedented scale. It must not be allowed to go ahead.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 148CF0A8

Member of the public 1072

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

Dear Sir/Madam

This letter formally objects to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the marine licensing and Environmental Impact Assessment regimes. The development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The concerns regarding this proposal stem from its scale, proximity, and design, which raise fundamental issues about its alignment with statutory requirements, national policy, and sustainable development principles.

The application presents significant shortcomings, as it lacks an adequate evidential basis for lawful determination. There are critical gaps in environmental data, and the baseline information provided is limited and inconsistent. Moreover, key elements of the proposal remain undefined. The flexible design framework obscures a clear understanding of potential significant effects, and the reliance on unspecified mitigation measures hinders any assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects are not substantiated by robust evidence.

Substantive policy conflicts are evident, as the proposal appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This is particularly relevant to biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not convincingly demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests necessary for consent, undermining the competent authority's ability to determine the development's acceptability in policy terms.

The scale of the proposed development is unprecedented for this location, with large turbines planned in close proximity to the shoreline. This introduces significant concerns related to landscape capacity, visual dominance, and overall environmental impact. When considering the absence of sufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance, it is evident that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is significantly lacking, as it does not deliver a comprehensive, transparent, or dependable overview of the potential environmental consequences of the proposal. The flexible Project Design Envelope

employed in the application, which lacks definitive turbine dimensions, layouts, or configurations, creates notable uncertainty. This lack of specificity compromises the application of a worst-case scenario and diminishes the assessment's integrity, making it impossible for both the public and the competent authority to grasp the true scale of the environmental impacts.

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

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

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

In summary, the combination of reliance on an unspecified design envelope, the absence of defined mitigation measures, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings obstruct a lawful and thorough evaluation of environmental impacts, thereby leaving the competent authority unable to make an informed determination based on the information provided.

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development is situated within key foraging areas and migratory pathways on the west coast of the Isle of Lewis, which supports internationally important seabird populations. Many of these populations are already in decline, yet the application does not adequately demonstrate that these species will not be adversely affected. The ornithological assessment is fundamentally flawed, containing significant gaps in evidence and internal inconsistencies that undermine its

conclusions. It fails to robustly evaluate the implications of displacement, collision risk, or habitat loss, particularly for species such as Kittiwakes and Fulmars, which are in severe decline.

A critical contradiction arises within the application, as the developer concludes that there are no significant adverse effects while also advancing a Habitats Regulations derogation case, a process only necessary when significant harm is anticipated. This inconsistency raises serious questions regarding the reliability of the assessment and suggests that the conclusions drawn are not supported by the evidence provided. The methodologies employed are likely to underestimate mortality, especially given that baseline data is incomplete and the behavioural responses of the species in question are not fully understood.

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

From a regulatory standpoint, the application does not meet the evidential threshold necessary to conclude that there would 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 satisfied. This invokes the precautionary principle, preventing a lawful conclusion in favour of consent.

In addition, 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 remain unaffected places the proposal in direct conflict with national policy.

Overall, the assessment's reliability is compromised due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. These shortcomings inhibit a robust evaluation of the potential impacts and lead to the conclusion that the application does not meet the statutory requirements necessary for a proper determination.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the assessment of social impacts, health, and wellbeing is significant and fundamentally undermines the evaluation's legality. Despite the developer commissioning a Social Impact Assessment, which included focus groups with local residents, the complete report remains unpublished. This lack of disclosure creates a substantial evidential gap, obstructing both public understanding and the ability of the competent authority to fully grasp the social risks highlighted by the developer's own research.

Summaries that are available indicate that residents are currently facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposal. These documented impacts stem from direct engagement and are not mere speculation. However, the absence of the complete assessment hinders the scrutiny of these findings and limits the capacity to evaluate their significance in the decision-making process.

Furthermore, there is an indication that the proposal is viewed as a direct threat to the community's identity and cohesion, with "cultural loss" identified in the developer's own findings. Yet, these impacts have not been adequately incorporated into the main application or given the appropriate weight they deserve. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of clarity significantly compromises the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is vital for developments of this magnitude, particularly where the character and functioning of the community may be at risk. The failure to provide the complete dataset means that the application does not furnish a thorough evidential basis for weighing the benefits against the harms.

From a policy standpoint, the application does not satisfactorily demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and mitigate harm; however, the existing evidence suggests adverse effects that have yet to be fully disclosed. Without the full assessment, compliance with this policy cannot be substantiated.

The procedural ramifications of this situation are considerable. The competent authority is unable to conduct a comprehensive socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This represents a material omission in the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, together with the evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This situation obstructs lawful determination and reinforces the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is inadequate and does not properly represent the extent of change or the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by its open Atlantic horizon, its undeveloped nature, and a strong sense of remoteness. The proposed large-scale turbines, situated close to the shoreline, would establish a continuous industrial presence, significantly altering this character and leading to a permanent and irreversible change in the landscape.

There is also a lack of clarity in the application regarding the magnitude of the visual change. Given their scale and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This would negatively impact visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not adequately convey the extent of this impact or its importance within such a sensitive landscape.

Methodological issues arise from the selection and presentation of visual viewpoints. It appears that the viewpoints may not represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and valuable landscapes. This may lead to an understatement of the visual impact, which questions the reliability of the assessment.

Moreover, the assessment does not 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 setting, linked visually and spatially to the Atlantic horizon. By treating these sites as isolated entities, the assessment overlooks their interdependence, resulting in an incomplete evaluation of impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are perceived and their connection to the natural horizon. This change is not merely a visual impact; it represents a broader cultural and spatial harm that has not been thoroughly evaluated in the application.

From a policy standpoint, the proposal contradicts National Planning Framework 4, which seeks to protect natural areas and historic assets. The proposed scale of change is at odds with the need to preserve landscape character, visual amenity, and the setting of culturally significant sites. The lack of a comprehensive worst-case assessment further diminishes the argument for policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. Due to the size, height, and proximity of the turbines, their presence would be overwhelming and unavoidable. The resulting changes are fundamental and permanent, rather than something that can be lessened to an acceptable degree through mitigation efforts.

In summary, the assessment fails to accurately portray the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is not compatible with the protection of this landscape.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The current assessment of the onshore infrastructure is fundamentally lacking and does not adequately consider the full range of impacts associated with what is a single integrated project. The offshore turbines and the onshore works are inherently

connected; however, they are evaluated separately, which results in a fragmented approach that obscures the true scale of both environmental and socio-economic consequences.

The onshore components include the installation of cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. Such activities necessitate excavation in areas of deep peat, particularly within Barvas Moor, a significant carbon store and ecologically sensitive environment. The application fails to deliver a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By excluding or postponing the assessment of onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all elements of a project be evaluated collectively; the division of offshore and onshore elements means the combined impacts on peatlands, habitats, and local communities remain inadequately understood.

Furthermore, there are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which hold policy protection. The application does not substantiate that impacts on these habitats have been comprehensively assessed or that suitable avoidance measures have been implemented. This creates a significant evidential gap in terms of biodiversity protection.

The proposal also raises issues concerning carbon balance. The disturbance of peatland can lead to the release of stored carbon, potentially resulting in a carbon debt that contradicts the aims of renewable energy development. The application fails to sufficiently address this matter or to demonstrate that the overall carbon balance is favourable.

Moreover, routing infrastructure through active croft land may introduce potential conflicts with existing land uses and legal rights. The application does not offer evidence that the necessary consents or processes have been initiated, casting doubt on the project's feasibility and lawful execution.

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

In summary, the separation 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, thus preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment concerning dark skies and nocturnal wildlife represents a significant failure within the Environmental Impact Assessment. The West Lewis coastline is noted for its exceptionally dark skies, which are crucial for environmental quality, cultural identity, and tourism, particularly in emerging sectors like astro-tourism. The proposal suggests the introduction of permanent red aviation lighting that will be visible over extensive distances, creating a continuous and disruptive "wall of light" effect across the western horizon, which would drastically change the night-time environment.

Furthermore, the application lacks an evaluation of the impact that this lighting will have on visual amenity, landscape character, and the experiences of both residents and visitors. This gap is critical, considering the vital role dark skies play in the region's identity. The failure to assess these implications leads to an incomplete landscape and environmental evaluation.

More alarmingly, the proposal does not address the potential impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly vulnerable to artificial lighting, which can cause disorientation and a higher risk of collisions. Without a lighting impact assessment or phototaxis study, there is no analysis regarding how the introduction of aviation lighting may affect these birds or increase their mortality rates.

This gap in assessment is further exacerbated by the reliance on daytime survey data within the ornithological evaluation, which does not account for nocturnal activity or the associated risks. Kittiwakes, for instance, may forage or migrate at night and are susceptible to disorientation from artificial lighting; however, this risk has not been evaluated. The lack of site-specific night-time data constitutes a critical shortcoming in understanding the ecological impacts.

In the absence of an assessment focused on nocturnal effects, it is impossible to ascertain whether protected species or designated sites will face adverse impacts. The necessary evidential standard to exclude potential adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and preventing a lawful determination.

From a policy standpoint, this oversight contradicts National Planning Framework 4, particularly regarding the safeguarding of natural areas and environmental quality. Additionally, it compromises the wider evaluation of landscape and seascape impacts, as the character of night-time environments is integral to the overall ecosystem.

Ultimately, the lack of any assessment relating to dark skies and nocturnal wildlife constitutes a major evidential gap. The absence of baseline data, impact modelling, and species-specific analysis renders the application incomplete and unable to support a lawful determination.

TOURISM

The application overlooks the critical assessment of tourism impacts, failing to evaluate the economic and social implications for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the region's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. Despite the application noting that 86% of visitors are attracted by scenery, it lacks a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or overall economic contributions.

Tourism has experienced considerable growth, increasing 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. Nevertheless, the application does not evaluate how the industrialisation of the seascape and the potential loss of environmental quality could affect Tourism Gross Value Added or the wider economic resilience of the area. Without such vital analysis, it remains unclear whether the proposed development would yield a net economic benefit or potentially harm an established and expanding sector.

Furthermore, the assessment neglects to address the importance of environmental quality in enhancing tourism, particularly the significance of unspoiled landscapes and dark skies for visitor experiences and emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this deficiency, creating a substantial gap in understanding the impacts on a recognized and growing aspect of the local economy.

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

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

Collectively, the shortcomings in quantifying tourism impacts, assessing the environmental drivers of visitor behaviour, and considering the island's economic dependency lead to a significant evidential gap. This hinders a thorough evaluation of economic effects and reinforces the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the requirements for sustainable development when considered against national policy, statutory duties, and evidential standards. This application mirrors the key issues that led to the rejection of the Lewis Wind Power proposal in 2008. At that time, the level of industrialisation was deemed unacceptable. Now, the application is being assessed

under a more rigorous policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant deficiencies in the evidence provided for this application. It lacks a comprehensive and reliable evidential basis for determination. Notable gaps in baseline data exist, and the use of an undefined design envelope is concerning. Furthermore, the reliance on unspecified mitigation measures and the omission of critical impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism, leave the Environmental Impact Assessment incomplete. This inadequacy hampers a full understanding of likely significant effects or residual impacts.

Procedural failures are evident as well. The absence of a compliant Island Communities Impact Assessment is a breach of statutory duty under the Islands (Scotland) Act 2018. Additionally, the failure to disclose the complete Social Impact Assessment represents a significant omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

This proposal contradicts the objectives set out in National Planning Framework 4. It does not adequately protect biodiversity, natural places, or cultural heritage. Furthermore, it fails to demonstrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, primarily due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been properly assessed, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. The assessments of marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The necessary evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful conclusion that impacts are acceptable.

Additionally, the proposal would cause substantial and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruptions to cultural and visual relationships, and negative impacts on tourism are permanent effects that cannot be mitigated to an acceptable level.

In summary, the application is procedurally and substantively unsuitable for determination. The extensive information deficiencies, combined with conflicts with policy and unresolved environmental risks, impede a lawful and evidence-based decision. The competent authority is urged to refuse consent on these grounds or to invoke the relevant regulatory provisions to request the missing information.

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

Additional Comments

Argument Against the Spioradh na Mara Offshore Wind Farm (N4) – Isle of Lewis, Scotland
1. Visual and Cultural Impact on a Sensitive Coastal Landscape
At only 6 km from the coastline, 60 turbines each reaching 325 metres in height would dominate the visual horizon. This would:
Significantly alter the natural, unspoiled character of Lewis's coastline.
Impact views from iconic heritage sites such as the Callanish Standing Stones, diminishing the area's spiritual and cultural value.
Undermine the island's Gaelic cultural identity, which is deeply connected to the land and sea.
2. Threat to Marine and Coastal Ecosystems
While wind energy is renewable, offshore developments of this scale carry environmental risks:
Disruption of marine habitats during construction, including noise pollution harmful to whales, dolphins, and other marine life.
Potential long-term impacts on seabird populations, particularly from turbine collisions and displacement from feeding grounds.
Disturbance to fish migration patterns and benthic ecosystems due to cable-laying and seabed anchoring.
3. Disproportionate Scale for a Local Environment
Turbines at 325 metres tall (taller than the Eiffel Tower) just 6 km offshore would:
Be highly visible from large parts of the island, especially in clear weather.
Introduce an industrial presence to a region otherwise defined by natural beauty and remoteness.
Cause significant light and shadow flicker effects, including blinking aviation and marine safety lights visible from shore.
4. Local Communities Receive Minimal Benefit
Though the project may be promoted as green progress, key concerns remain:
Local communities often receive limited economic return, while profits are absorbed by national or multinational companies.
No clear guarantee exists of long-term jobs or reinvestment into the island economy.
The project may even restrict fishing and maritime activity, threatening local livelihoods.
5. Precedent and Cumulative Impact
The N4 development is one of many wind projects being proposed or built around Lewis and the wider Outer Hebrides. Taken together:
They risk industrialising the seascape and damaging the natural brand that supports eco-tourism and cultural heritage.
Create a precedent for further large-scale infrastructure projects without adequate democratic consultation.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: C74CF22D

Member of the public 1073

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, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The application is located off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline and a near-pristine environment that reflects a strong cultural identity. However, the proposal raises fundamental concerns about its compatibility with statutory requirements, national policy, and the principles of sustainable development due to its scale, proximity, and design.

A review of the Environmental Impact Assessment Report and supporting documentation reveals critical deficiencies. The application lacks an adequate evidential basis for a lawful determination, as critical environmental data is missing, baseline information is both limited and inconsistent, and significant aspects of the proposal remain undefined. The use of a flexible design framework further complicates the ability to assess likely significant effects, while the reliance on unspecified mitigation measures means their effectiveness cannot be evaluated. Consequently, the documentation fails to facilitate a comprehensive understanding of the potential environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by robust evidence.

Moreover, there are substantive policy conflicts associated with the proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly affect the statutory tests for consent and impair the ability of the competent authority to conclude that the development is acceptable in policy terms.

The unprecedented scale of the proposal in this location, with large turbines positioned near the shoreline, raises significant concerns regarding landscape capacity, visual dominance, and overall environmental impact. Collectively, the lack of sufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and inadequate for supporting a lawful determination. In light of these issues, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application presents a number of serious deficiencies that collectively undermine its validity. The reliance on an undefined Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations, creates significant uncertainty. This lack of clarity obstructs the ability to apply a worst-case scenario consistently, thereby compromising the integrity of the Environmental Impact Assessment Report. As a result, the environmental impacts outlined may not accurately reflect those of the final development, depriving both the public and the competent authority of a proper understanding of potential environmental effects.

Moreover, the application is overly dependent on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent based on the assumption that environmental harm will be managed later is inappropriate, as it precludes a meaningful evaluation of these measures' effectiveness or the assessment of any residual impacts. This deferral of critical information to post-consent stages contradicts the core objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies be established prior to determination.

Significantly, there are notable evidential gaps, including a lack of comprehensive baseline data and methodological limitations, along with a reliance on assumptions rather than site-specific evidence. These shortcomings lead to uncertainty regarding the magnitude and significance of impacts. The presentation of conclusions asserting negligible or non-significant effects without robust supporting data further obscures understanding. The lack of sufficient information hinders clarity on cumulative and worst-case impacts, introducing a level of scientific uncertainty that is inconsistent with statutory requirements.

As a result, the application does not meet the evidential threshold mandated under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to satisfy the requirements of National Planning Framework 4, particularly those related to biodiversity protection and environmental integrity. The inability to demonstrate that impacts have been fully assessed or that appropriate safeguards exist is evident.

In conclusion, the combination of an undefined design envelope, the absence of specified mitigation measures, and significant gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These critical deficiencies prevent a lawful and thorough assessment of environmental effects, leaving the competent authority ill-equipped to make an informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The Environmental Impact Assessment regime requires a thorough assessment of alternatives, which is notably absent in this application. 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 fails to show that less harmful options have been properly identified, assessed, and selected over more damaging solutions.

There is a complete lack of transparent or evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not indicate that the developer has adequately explored the option of positioning turbines further offshore, an approach that could potentially mitigate visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline, as well as the critical role that proximity to the shore plays in determining impact, the omission of such analysis means that it cannot be concluded that the proposed siting is the least damaging option.

The inadequacies also extend to the assessment of cable routing and landfall. There is insufficient evidence demonstrating that alternative routes have been thoroughly investigated to avoid or minimise impacts on sensitive receptors, which include culturally and spiritually significant areas such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis suggests that the design did not incorporate mitigation by design, instead relying on post-design measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through thoughtful site selection, layout, and infrastructure routing. This represents a failure to adhere to the established mitigation hierarchy, ultimately hindering the competent authority's ability to ascertain whether there are less harmful and more suitable alternatives available. The absence of a robust alternatives assessment leads to the conclusion that the proposal does not embody a sustainable or policy-compliant solution.

From a policy standpoint, this shortcoming undermines compliance with National Planning Framework 4, particularly concerning the protection of natural areas, cultural heritage, and community wellbeing. The failure to present a structured and comparative assessment is a significant omission that contributes to the overall determination that the application has not been sufficiently evaluated and thus cannot support a lawful decision.

MARINE ECOLOGY AND PROTECTED SPECIES

The current proposal fails to provide a comprehensive assessment of marine ecology and protected species, particularly within the West Lewis coastal environment, which is known for its biological activity and sensitivity. The existing baseline data is inadequate, and the methodologies employed do not sufficiently capture the presence, behaviour, and habitat use of various species. Consequently, there is no reliable evidential basis for assessing impacts.

Significantly, the application does not adequately recognise the presence and activities of otters, a species protected under European law, in coastal areas where they forage and move. The failure to evaluate their core foraging range and behavioural patterns

leaves a gap in understanding the potential impacts from construction activities, noise, and increased human presence. This omission compromises any assertions made regarding the lack of significant effects on otters.

The assessment of basking sharks also reveals critical deficiencies, as reliance on aerial surveys introduces a considerable detection bias that is particularly pronounced in Atlantic conditions. This method is likely to underestimate the presence of basking sharks, especially when compared to established observations from land-based surveys that show frequent use of these waters. The neglect to incorporate or adequately consider such vital data contributes to an incomplete baseline and undermines the reliability of the findings presented.

The methodological shortcomings lead to conclusions regarding negligible or non-significant effects being based on mere assumptions, rather than on robust evidence. Moreover, the lack of sufficient baseline data inhibits a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation results in uncertainty about the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the stipulations of the Environmental Impact Assessment framework or the National Planning Framework 4. The inadequate identification and assessment of protected species introduce uncertainty that prevents the clear exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it is not lawful to grant consent.

In summary, the deficiencies stemming from incomplete baseline data, flawed methodologies, and unsubstantiated conclusions culminate in an unreliable assessment. These issues hinder a thorough evaluation of impacts on marine ecology and protected species, reinforcing the conclusion that the application lacks a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment presented within the application is fundamentally flawed, characterised by significant evidence gaps and internal contradictions that fundamentally undermine its conclusions. A notable contradiction arises from the developer's assertion that there will be no significant adverse effects, even as they pursue a Habitats Regulations derogation case, which is only applicable when significant harm is anticipated. This inconsistency raises serious concerns about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the evidence provided.

The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application fails to adequately demonstrate, to the necessary evidential standard, that these species will remain unaffected. The siting of turbines within recognised migratory corridors creates

a substantial risk, as it introduces a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. Furthermore, the assessment does not thoroughly evaluate the long-term consequences of sustained mortality within this corridor or the potential impacts on species with relatively small global populations.

Moreover, the assessment lacks sufficient evidence to ensure that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will not be adversely affected. The significance of these feeding grounds is not fully acknowledged, and the reliance on modelling approaches adds uncertainty, particularly for species in severe decline such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, especially when baseline data is incomplete and behavioural responses are not fully understood.

From a regulatory standpoint, the application fails to meet the evidential threshold required to determine 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 standard of beyond reasonable scientific doubt has not been achieved. This situation invokes the precautionary principle and precludes a lawful conclusion in favour of consent.

The identified deficiencies also signify non-compliance with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to convincingly demonstrate that internationally important seabird populations will not be adversely affected places the proposal directly at odds with national policy. Collectively, these weaknesses render the assessment unreliable and inhibit a thorough evaluation of impacts, ultimately leading to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development fails to adequately assess cultural heritage and community identity, neglecting the West Lewis coastline as a living cultural landscape. This area is defined by a connection between environment, language, tradition, and community, yet the application reduces heritage to a collection of isolated, static assets, ignoring their ongoing social, cultural, and spiritual roles.

Significant shortcomings are evident in how culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are treated. These sites serve as active places for burial and spiritual practice; however, they are characterised in the assessment as mere static features. This oversight disregards their continued use and the implications of development on their surrounding environment, leading to an incomplete understanding of cultural effects and their importance to community life.

Moreover, the assessment omits intangible cultural heritage elements, including the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These aspects are essential to the area's identity yet receive no acknowledgment, resulting in a significant oversight. The cultural

impact of the development cannot be fully grasped without factoring in these elements.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity and characteristics recognised as those of an Indigenous People. However, there has been no process of Free, Prior and Informed Consent, undermining the assessment's legitimacy and failing to adhere to established principles of participation concerning decisions that affect cultural and environmental interests.

A notable procedural failure is the lack of a compliant Island Communities Impact Assessment, which is a statutory requirement under the Islands (Scotland) Act 2018. The absence of this assessment means the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community, rendering the determination unlawful.

From a policy standpoint, these deficiencies conflict with National Planning Framework 4, particularly concerning the protection of historic assets and places. The neglect of both tangible and intangible heritage and the failure to acknowledge living cultural practices mark a clear violation of policy requirements.

In summary, the combined failure to assess living heritage, intangible cultural value, community rights, and statutory responsibilities leads to a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application falls short of providing a sufficient basis for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's commissioned Social Impact Assessment included engagement with local residents, but the full report remains unpublished, creating a significant evidential gap. This lack of transparency hampers both public understanding and the competent authority's ability to gauge the extent of social risks identified in the developer's own research.

Residents are reportedly facing measurable levels of stress, anxiety, and concern linked to the proposal's scale and proximity. These reported impacts stem from direct community engagement and should not be considered speculative. However, without access to the complete assessment, the implications of these findings cannot be properly scrutinised, which limits their significance in the decision-making process.

Furthermore, the proposal is viewed as a potential threat to community identity and cohesion, with the developer acknowledging “cultural loss” in their findings. Despite this, the impacts have not been adequately incorporated into the main application or given the necessary weight. The decision to withhold the full Social Impact Assessment obscures the real human and social costs associated with the development.

The lack of transparency also undermines the Environmental Impact Assessment

process. A comprehensive understanding of social, economic, and health impacts is vital for projects of this magnitude, especially when community character and functioning may be at stake. The failure to provide the complete dataset means the application lacks a robust evidential basis for weighing benefits against harm.

From a policy standpoint, the application does not illustrate compliance with the National Planning Framework 4 concerning health and wellbeing. It is essential for developments to foster positive health outcomes and mitigate harm. However, the existing evidence points to adverse effects that remain undisclosed. Without the full assessment, it cannot be demonstrated that the application meets policy requirements.

The procedural ramifications are considerable. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This situation represents a material omission within the application and a failure to satisfy the evidential standards of the Environmental Impact Assessment framework.

Overall, the non-disclosure of the full Social Impact Assessment, together with the evidence of existing adverse impacts, renders the evaluation incomplete and untrustworthy. This situation hinders a lawful determination and underscores that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts lacks depth and does not adequately capture the significant changes expected nor the sensitivity of the surrounding environment. The coastline of West Lewis features an expansive Atlantic horizon, an undeveloped nature, and a strong sense of remoteness. The proposed installation of large turbines near the shoreline would create an overwhelming industrial presence that would fundamentally alter this landscape, leading to a permanent change.

Moreover, the application does not fully convey the extent of this visual alteration. The size and location of the turbines would dominate views from residential properties, historical sites, and popular coastal areas, affecting visual amenity and detracting from the qualities of naturalness and remoteness. The assessment does not effectively demonstrate the impact's significance within such a sensitive landscape.

There are concerns regarding how visual viewpoints were chosen and presented. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly concerning important cultural heritage sites and valued landscapes. This raises the possibility that the visual impact has been underestimated, questioning the assessment's reliability.

Another significant shortcoming is the failure to evaluate the interconnectedness of landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape connected to

the Atlantic horizon through visual and spatial relationships. The assessment regards these sites as separate entities rather than acknowledging their interdependence, resulting in an incomplete understanding of the impacts on their setting and cultural value.

The industrialisation of the seascape would disrupt these relationships, altering how heritage sites are perceived and severing their connection to the natural horizon. This results in both visual and broader cultural harm that has not been adequately evaluated in the application.

From a policy standpoint, the proposal contradicts National Planning Framework 4 regarding the safeguarding of natural areas and historic assets. The level of change proposed is inconsistent with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further weakens any argument for compliance with policy.

It is also evident that the identified impacts cannot be sufficiently mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelming and unavoidable. The resulting change is therefore substantial and enduring, rather than something that could be reduced to an acceptable level through mitigation efforts.

In summary, the assessment fails to accurately reflect the extent of the impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings hinder a dependable evaluation and reinforce the conclusion that the proposal does not align with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application does not provide sufficient detail to assess construction and pollution risks, which raises serious concerns. It involves significant seabed preparation and installation in a challenging Atlantic environment. However, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included. Instead, the application depends on mitigation and contingency measures to be created after consent is granted. This approach limits the ability to evaluate their effectiveness or adequacy.

The West Lewis coastline is particularly sensitive, supporting clean coastal waters and vital habitats that may be harmed by sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it lacks adequate detail on prevention, control, or monitoring strategies.

There is also uncertainty about the scale and behaviour of sediment plumes that may result from seabed disturbances and cable installation. Robust modelling and clearly defined management strategies are necessary to understand the potential extent, duration, and ecological effects of these impacts. This uncertainty encompasses potential effects on marine species and habitats already recognised as sensitive in the

broader assessment.

The lack of detailed emergency response procedures further heightens these issues. By postponing contingency planning until after consent, the application obstructs a proper evaluation of whether appropriate safeguards exist to deal with pollution incidents. This not only introduces procedural risk but also hinders the competent authority's ability to assess environmental protection measures before making a decision.

From a regulatory standpoint, deferring crucial environmental safeguards contradicts the Environmental Impact Assessment requirements. Significant effects and necessary mitigation must be evaluated before granting consent, and without this information, a lawful determination cannot occur. The application does not demonstrate compliance with policies related to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry, both of which are at risk due to the proposal in question. The assessment concerning fisheries and marine life is inadequate, failing to provide a thorough evaluation of the ecological and socio-economic impacts. It is particularly troubling that the application assumes fishing activities can be displaced without any negative consequences. There is no evidence presented to support the claim that alternative fishing grounds are available and capable of accommodating the additional pressures that would arise. This significant omission raises the potential for overfishing in other areas, which could have detrimental economic effects on the local fishing fleet. Without a solid, evidence-based assessment, the consequences for fisheries and the livelihoods they support remain obscured.

In addition to these concerns, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated during construction activities. The anticipated high-energy hammer piling over an extended period is likely to disrupt marine life across vast distances, affecting populations such as dolphins. The predicted disturbance to a significant proportion of the local bottlenose dolphin population is alarming, yet the application appears to minimise these concerns without providing adequate supporting evidence.

Furthermore, there is an evident inconsistency within the application itself, as it acknowledges the need for licences to permit harm to European Protected Species while simultaneously claiming that the impacts are negligible. This contradiction seriously undermines the credibility of the assessment and raises questions about its compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation. The assessment also neglects to address cumulative

impacts arising from various pressures, including habitat disturbance, noise, and fishing displacement. A comprehensive evaluation of these interconnected effects is crucial to understand 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 proposed development can coexist with existing marine users or avoid unacceptable harm to marine biodiversity, which prevents any conclusion that the proposal represents sustainable development. The deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the application collectively render the assessment incomplete and unreliable. These shortcomings hinder a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal includes significant infrastructure developments, such as cabling across protected moorland, the construction of a substation near Stornoway, and the creation of access routes through sensitive landscapes. Notably, these onshore works involve excavation across areas of deep peat, particularly within Barvas Moor, which serves as an important carbon store and ecologically sensitive habitat. However, the application fails to offer a comprehensive assessment of these impacts, which is essential for understanding the project's overall environmental footprint.

There are considerable risks posed to sensitive habitats, including machair systems and peatland environments that benefit from policy protection. The lack of a thorough assessment of impacts on these habitats raises concerns about biodiversity protection and demonstrates a clear evidential gap. Additionally, the disturbance of peatland resulting from the project could lead to a release of stored carbon, potentially creating a carbon debt that contradicts the renewable energy objectives. The application does not adequately tackle this issue or show that the overall carbon balance will remain beneficial.

The assessment of onshore infrastructure is notably incomplete, and the separate evaluation of offshore turbines and onshore works leads to a fragmented approach, obscuring the true scale of environmental and socio-economic effects. By not assessing all project components together, the application prevents a proper evaluation of cumulative impacts, leaving the combined effects on peatlands, habitats, and local communities inadequately understood.

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

From a policy perspective, the failure to assess the project as a cohesive whole and to

demonstrate protection for peatlands, habitats, and land use interests is in direct conflict with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further undermines the credibility of the application. Taken together, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts make this portion of the application incomplete and unreliable, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment is notably lacking in its evaluation of dark skies and nocturnal wildlife, which constitutes a significant oversight. The West Lewis coastline is known for its exceptionally dark skies, a crucial aspect of both environmental quality and cultural identity, as well as an important factor for tourism. The proposed installation of permanent red aviation lighting would create a continuous "wall of light" effect that could be seen from long distances, fundamentally changing the night-time landscape.

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

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

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

Without a thorough assessment of nocturnal impacts, it remains unclear whether protected species or designated sites could be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, which invokes the precautionary principle and calls into question the legality of the proposal.

From a policy standpoint, this lack of assessment contravenes National Planning Framework 4, which seeks to protect natural places and maintain environmental quality. It also diminishes the overall evaluation of landscape and seascape impacts,

as the character of the night environment is a crucial component of the broader ecosystem.

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

TOURISM

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

Tourism has experienced considerable growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and represents up to 16% of the island's economy. However, the application does not consider how the industrialisation of the seascape and the degradation of environmental quality could affect Tourism Gross Value Added or the broader economic resilience. Without this analysis, it is impossible to ascertain whether the development would produce a net economic benefit or harm an established and growing sector.

Moreover, the assessment overlooks the role of environmental quality in promoting tourism, including how unspoiled landscapes and dark skies enhance visitor experiences and cater to emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortcoming, creating a significant gap in understanding the impacts on a recognised and expanding part of the local economy.

Given the limited economic diversification within the island community, the failure to evaluate impacts on tourism carries broader implications for employment, local businesses, and community sustainability. Additionally, the absence of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been examined as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not show adherence to National Planning Framework 4, especially concerning economic impact and the obligation to demonstrate net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector and does not furnish adequate evidence for the competent authority to assess the economic ramifications of the proposal.

In summary, the failure to quantify tourism impacts, evaluate environmental factors influencing visitor behaviour, and recognise the island's economic dependency

culminates in a significant evidential gap. This undermines a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the standards of sustainable development as defined by statutory duties, national policy, and evidential criteria. The application echoes the fundamental issues that resulted in the 2008 rejection of the Lewis Wind Power proposal, where the unacceptable scale of industrialisation was highlighted. This current proposal is put forth under a policy framework that supposedly emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it still does not satisfy these requirements.

There are substantial shortcomings in the evidential basis for determining the application. Critical gaps exist in baseline data, with an undefined design envelope and unspecified mitigation measures. Furthermore, key impact pathways such as nocturnal wildlife, the full scope of onshore infrastructure, and effects on tourism have been omitted. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a clear understanding of potential significant effects and residual impacts.

Additionally, procedural issues are evident. The lack of a compliant Island Communities Impact Assessment breaches the statutory duties established under the Islands (Scotland) Act 2018. Furthermore, the failure to present a full Social Impact Assessment constitutes a material omission, hindering the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

The proposal contradicts National Planning Framework 4, as it does not adequately protect biodiversity, natural places, or cultural heritage. It also fails to demonstrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. Moreover, the cumulative impact of offshore and onshore components has not been adequately assessed, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and exhibit inconsistencies. The evidential threshold required to demonstrate the absence of adverse effects beyond reasonable scientific doubt has not been achieved, necessitating the application of the precautionary principle, which prevents a lawful conclusion that impacts are acceptable.

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, disruption to cultural and visual connections, and negative implications for tourism are all permanent effects that cannot be mitigated to an

acceptable level.

In summary, the application is both procedurally and substantively unfit for determination. The significant information deficiencies, paired with policy conflicts and unresolved environmental risks, obstruct a lawful and evidence-based decision. It is imperative that the competent authority either refuses consent based on these grounds or invokes the appropriate regulatory provisions to mandate the submission of the missing information.

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

Yours faithfully,

[Redacted]

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