Member of the public 1103

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 regulations. The objection is based on a review of the Environmental Impact Assessment Report and its supporting documentation, highlighting material deficiencies in planning, environmental considerations, cultural aspects, and procedural elements. The wind farm is proposed off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The proposal raises fundamental concerns regarding its compatibility with statutory requirements, national policy, and the principles of sustainable development due to its scale, proximity, and design.

The application does not present a sufficient evidential basis for lawful determination. It lacks critical environmental data, with baseline information being limited and inconsistent, and significant aspects of the proposal are undefined. A flexible design framework complicates the assessment of likely significant effects, while the reliance on unspecified mitigation measures leaves their effectiveness unassessed. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust evidence.

There are evident 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. It does not demonstrate that national obligations to protect biodiversity, climate interests, and environmental integrity can be fulfilled. These conflicts directly challenge the statutory tests required for consent and hinder the competent authority's ability to determine that the development meets policy standards.

The scale of the project is unprecedented for this area, with large turbines situated close to the shoreline, raising significant issues about landscape capacity, visual dominance, and environmental impact. Overall, the lack of sufficient 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 factors, the precautionary principle should apply.

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.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment related to marine ecology and protected species is fundamentally flawed and fails to provide a thorough and trustworthy understanding of the ecological receptors present in the West Lewis coastal environment. This marine system is not only biologically active but also highly sensitive, yet the baseline data remains incomplete, and the methodologies utilised do not adequately capture the presence, behaviour, and habitat use of the species. Consequently, the assessment lacks a solid evidential foundation for evaluating potential impacts.

A significant oversight in this application pertains to otters, which are designated as a

European Protected Species. There has been inadequate recognition and assessment of their active foraging and movement within the coastal areas. The failure to consider their core foraging range and behavioural patterns means that the potential impacts of construction disturbance, noise, and increased activity have not been sufficiently examined. This shortcoming undermines any conclusions drawn regarding the absence of significant effects on this species.

Furthermore, the evaluation of basking sharks is deficient, as it relies heavily on aerial surveys that introduce considerable detection bias, particularly under Atlantic conditions. This methodology is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations which demonstrate their frequent use of these waters. The omission of relevant data leads to an incomplete baseline and diminishes the reliability of the conclusions reached.

These methodological shortcomings imply that any conclusions drawn regarding negligible or non-significant effects rest on assumptions rather than on strong evidence. The lack of adequate baseline data also obstructs a meaningful evaluation of cumulative and indirect impacts, which include seasonal variations and broader ecosystem interactions. This introduces uncertainty regarding the actual level of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set by the Environmental Impact Assessment regime and the National Planning Framework 4, as it has not properly identified or assessed protected species. The degree of uncertainty created precludes the ability to exclude adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these conditions, it is not lawful to grant consent.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These deficiencies hinder a robust evaluation of impacts on marine ecology and protected species and contribute to the overall determination that the application lacks an adequate evidential basis.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, seascape, and landscape is significantly flawed and does not reflect the true scale of change or the sensitivity of the environment. The coastline of West Lewis features an open Atlantic horizon and an undeveloped character, contributing to a strong sense of remoteness. The introduction of large-scale turbines near the shoreline would create a continuous industrial presence, fundamentally altering this character and leading to a permanent and irreversible transformation of the landscape.

The application fails to adequately convey the magnitude of this visual change. Due to the scale and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations. This would directly affect visual

amenity and undermine the naturalness and remoteness that define the area. The assessment does not accurately reflect this level of impact or its significance within such a sensitive landscape.

There are methodological issues concerning the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly regarding key cultural heritage sites and high-value landscapes. This raises concerns that the visual impact may be understated, thus compromising the reliability of the assessment.

Another critical deficiency is the lack of evaluation regarding the interconnected relationship between landscape, seascape, and cultural heritage. Significant sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape interconnected by visual and spatial relationships with the Atlantic horizon. The assessment treats these as isolated features, failing to acknowledge their interdependence, which leads to an incomplete evaluation of impacts on their setting and cultural significance.

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

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

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

In summary, the assessment does not accurately depict the scale of impact, the sensitivity of the environment, or the interconnected nature of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

TOURISM

The analysis of tourism impacts within the application is substantially inadequate and neglects to assess the economic and social ramifications for a vital sector of the Isle of Lewis economy. The tourism industry relies heavily on the region's wild coastline, almost untouched landscape, dark skies, and the sense of remoteness that these features provide. While the application notes that 86% of visitors are attracted by the

scenery, it lacks a quantified analysis of how large-scale offshore infrastructure may influence visitor numbers, behaviours, or the overall economic contribution to the area.

The tourism sector has seen notable growth, with its economic contribution 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 proposal does not consider how the potential industrialisation of the seascape and a decline in environmental quality could affect Tourism Gross Value Added and overall economic resilience. Without such analysis, it remains uncertain whether the development would provide a net economic benefit or jeopardise an established and expanding sector.

Moreover, the assessment fails to recognise the significance of environmental quality in sustaining tourism, particularly the value of pristine landscapes and dark skies for enhancing visitor experiences, as well as the opportunities presented by emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortcoming, creating a substantial gap in understanding the impacts on a recognised and burgeoning segment of the local economy.

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

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, specifically regarding economic impact and the necessity to illustrate net benefit. Additionally, it 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 consequences of the proposal.

In summary, the deficiencies in quantifying tourism impacts, evaluating environmental influences on visitor behaviour, and addressing the island's economic reliance culminate in a significant evidential gap. This shortfall obstructs a thorough assessment of economic effects and contributes to the conclusion that the application remains incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm raises serious concerns about its alignment with sustainable development principles as outlined in statutory duties, national policy, and evidential standards. It mirrors the issues that led to the 2008 rejection of the Lewis Wind Power proposal, where the extent of industrialisation was deemed unacceptable. Despite being presented within a stronger policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, the proposal falls short.

Critical gaps in baseline data undermine the evidential basis for decision-making. The reliance on an undefined design envelope, unspecified mitigation measures, and the failure to consider significant impact pathways such as nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects leave the Environmental Impact Assessment incomplete. This lack of thoroughness prevents an understanding of likely significant effects or residual impacts.

Moreover, there are evident procedural shortcomings. The failure to conduct a compliant Island Communities Impact Assessment contravenes statutory duties under the Islands (Scotland) Act 2018, while the non-disclosure of the full Social Impact Assessment is a material omission. These deficiencies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for consideration.

The proposal directly contradicts National Planning Framework 4, as it does not adequately protect biodiversity, natural places, and cultural heritage. It fails to establish that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, primarily due to the absence of tourism impact modelling. Furthermore, the cumulative effects of both offshore and onshore components have not been thoroughly evaluated, masking impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. Incomplete assessments concerning marine ecology, seabirds, protected species, and marine mammals, along with internal inconsistencies, indicate that the evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved. This engages the precautionary principle, thereby preventing a lawful conclusion regarding the acceptability of impacts.

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

In conclusion, the application is fundamentally unfit for determination, both procedurally and substantively. The significant information deficiencies, coupled with policy conflicts and unresolved environmental risks, obstruct a lawful and evidence-based decision-making process. Therefore, it is requested that consent for the Spiorad na Mara Offshore Wind Farm application is refused in its entirety.

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: 5EA7AC5C

Member of the public 1104

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted for consideration under the marine licensing and Environmental Impact Assessment frameworks. The objection arises from a thorough review of the Environmental Impact Assessment Report and associated documents, revealing significant deficiencies in material planning, environmental assessment, cultural considerations, and procedural adherence. Situated off the west coast of the Isle of Lewis, the proposed development occupies an area characterised by its Atlantic-facing coastline, relatively untouched natural environment, and a strong cultural identity. Concerns about the scale, proximity, and design of the proposed project call into question its alignment with statutory requirements, national policy directives, and the tenets of sustainable development.

The evidence presented in the application is inadequate for a lawful determination. It lacks critical environmental data, with limited and inconsistent baseline information, and several key elements of the proposal remain undefined. The flexible design framework used complicates the assessment of likely significant effects. Furthermore, the reliance on unspecified mitigation measures means their effectiveness cannot be properly evaluated. Consequently, the documentation fails to provide a comprehensive understanding of potential environmental, cultural, or community impacts, leaving assertions of negligible or non-significant effects unsupported by credible evidence.

There are notable conflicts with established policy frameworks. The proposal appears to violate provisions of the National Marine Plan, the Environmental Impact Assessment regulations, and National Planning Framework 4, particularly concerning biodiversity, natural habitats, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national obligations to safeguard biodiversity, climate considerations, and environmental integrity. These discrepancies directly affect the statutory tests necessary for obtaining consent, jeopardising the competent authority's ability to determine the development's acceptability from a policy standpoint.

The unprecedented scale of the proposal, which includes large turbines positioned near the shoreline, raises significant concerns about landscape capacity, visual impact, and environmental consequences. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy discrepancies indicates that the application is incomplete and incapable of facilitating a lawful determination. Given these circumstances, it is essential that the precautionary principle is invoked.

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.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species is significantly inadequate, failing to provide a complete and reliable understanding of ecological receptors in the West Lewis coastal environment. This area constitutes a highly sensitive and biologically active marine system, yet the baseline data presented is incomplete, and the methodologies employed do not sufficiently capture species presence, behaviour, and habitat utilisation. Consequently, the assessment lacks a robust evidential basis for assessing potential impacts.

One critical shortcoming is the treatment of otters, a species protected under European

law. The application does not adequately recognise or assess their active utilisation of coastal regions for foraging and movement. The omission of their core foraging range and behavioural patterns leads to a failure in evaluating the potential impacts of construction-related disturbances, noise, and increased activity. This gap in the assessment undermines any assertions regarding the absence of significant effects on otters.

Additionally, the assessment of basking sharks reveals further weaknesses, as it relies on aerial surveys that are prone to significant detection bias, especially under Atlantic conditions. This methodology likely underrepresents the presence of basking sharks when compared to established land-based observations, which indicate frequent usage of these waters. The neglect to incorporate or adequately consider such data results in a deficient baseline and diminishes the reliability of the conclusions drawn.

The methodological flaws mean that the conclusions of negligible or non-significant effects are based more on assumptions than on solid evidence. The lack of sufficient baseline data hinders any meaningful assessment of cumulative and indirect impacts, such as seasonal variations and interactions within the wider ecosystem. This situation creates uncertainty about the actual risks faced by marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainty generated by this assessment prevents the exclusion of adverse effects beyond a reasonable scientific doubt, thus invoking the precautionary principle. Under these conditions, granting consent would not be lawful.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development raises significant concerns regarding its reliability and adherence to regulatory standards. It indicates that the west coast of the Isle of Lewis, home to internationally important seabird populations, is not adequately protected. Many of these species are already in decline, yet the application fails to provide sufficient evidence that their interests will not be adversely impacted. The turbines are sited within vital foraging areas and migratory pathways, yet the implications of displacement, collision risk, and habitat loss remain poorly evaluated.

A critical inconsistency undermines the application, as the developer asserts there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation. Such a case is only warranted when significant harm is anticipated, calling the credibility of the assessment into question. Furthermore, the application does not

convincingly demonstrate that seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, will be unaffected. The importance of these feeding grounds is inadequately addressed, and reliance on modelling approaches adds uncertainty, especially for vulnerable species like Kittiwakes and Fulmars. The methodologies employed likely underestimate mortality, particularly in light of incomplete baseline data and a lack of understanding of behavioural responses.

The placement of turbines within a recognized migratory corridor poses an additional risk by effectively obstructing a primary flight path utilized by species migrating between the United Kingdom and Iceland. The assessment fails to thoroughly consider the long-term consequences of sustained mortality in this corridor and its potential effects on species with relatively small global populations.

From a regulatory viewpoint, the application does not meet the evidential threshold necessary to assert no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, coupled with data gaps and methodological limitations, indicates that the standard of beyond reasonable scientific doubt has not been satisfied. This situation engages the precautionary principle, preventing a lawful conclusion in favour of consent.

Moreover, the identified deficiencies reflect a failure to comply with National Planning Framework 4 regarding biodiversity protection and the preservation of natural assets. The inability to show that internationally significant seabird populations will remain unaffected places the proposal at odds with national policy.

In summary, the assessment is fundamentally flawed due to internal inconsistencies, methodological shortcomings, and insufficient evidence, ultimately leading to the conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The treatment of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas, raises serious concerns. These locations are active burial sites and hold spiritual significance, yet they have been categorised as static features in the assessment. This approach neglects their ongoing use and meaning within the community and fails to address how the proposed development will impact their setting. Such mischaracterisation leads to an incomplete understanding of the cultural effects and dismisses their integral role in community life.

Moreover, the assessment disregards intangible aspects of cultural heritage, such as the Gaelic language and local traditions, along with the longstanding relationship between the community and the coastal environment. These elements are vital to the area's identity, yet they are completely omitted from the evaluation. Ignoring these factors means that the cultural impact of the development cannot be accurately comprehended.

Community rights and engagement also remain inadequately addressed. The Gaelic-speaking population, which possesses characteristics of an Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the legitimacy of the assessment and fails to reflect established principles for participation in decisions that affect cultural and environmental interests.

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

From a policy standpoint, these shortcomings place the proposal at odds with National Planning Framework 4, particularly regarding the protection of historic assets and places. The lack of consideration for both tangible and intangible heritage, alongside a failure to recognise living cultural practices, constitutes a departure from policy requirements.

Ultimately, the combined failure to assess living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, leaving the application insufficient for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development raises serious concerns regarding its social impacts, health, and wellbeing, which have not been adequately addressed. A Social Impact Assessment was commissioned by the developer, including engagement with local residents through focus groups. However, the full report has not been made available, leading to a significant evidential gap that hinders both the public's understanding and the competent authority's ability to fully grasp the social risks identified by the developer's research.

Residents are reportedly experiencing stress, anxiety, and concern related to the scale and proximity of the proposal, as indicated in available summaries. These effects stem from direct engagement with the community and are therefore based on real experiences rather than speculation. The failure to disclose the complete assessment restricts proper scrutiny of these findings and affects the evaluation of their importance in the decision-making process.

Additionally, the proposal has been viewed as a threat to community identity and cohesion, with a noted risk of "cultural loss" highlighted in the developer's findings. Despite this acknowledgment, such impacts have not been adequately incorporated into the main application, nor have they been afforded appropriate consideration. The lack of transparency surrounding the full Social Impact Assessment conceals the true

human and social costs associated with the development.

This deficiency in disclosure compromises the Environmental Impact Assessment process. For developments of this magnitude, a thorough understanding of social, economic, and health implications is crucial, especially when community character and functionality may be impacted. The absence of the complete dataset means that the application lacks a comprehensive evidential foundation for evaluating the balance between potential benefits and harms.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 concerning health and wellbeing. Developments are expected to foster positive health outcomes and mitigate harm; however, the available evidence suggests existing negative effects that have not been fully revealed. Without the complete assessment, it is impossible to prove compliance with this policy.

The procedural ramifications of these omissions are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a significant omission within the application, failing to meet the evidential requirements established by the Environmental Impact Assessment framework.

In summary, the non-disclosure of the full Social Impact Assessment, coupled with evidence of pre-existing adverse effects, results in an incomplete and unreliable evaluation. This situation precludes a lawful determination and reinforces the assertion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts on the seascape, landscape, and cultural heritage is inadequate and does not accurately portray the scale of change or the sensitivity of the environment. The coastline of West Lewis, characterised by its expansive Atlantic horizon and undeveloped landscape, embodies a profound sense of remoteness. The proposed installation of large turbines near the shoreline would impose a dominant industrial presence that would irreversibly alter this character, resulting in a permanent transformation of the landscape.

Moreover, the application does not sufficiently convey the extent of this visual change. The size and closeness of the turbines would overwhelm views from residential areas, historic sites, and popular coastal locations, thus diminishing visual amenity and compromising the inherent qualities of naturalness and remoteness. The assessment inadequately reflects this impact and overlooks its significance within such a delicate landscape.

Concerns also arise regarding the selection of visual viewpoints, which may not fully encompass the most sensitive receptors or worst-case scenarios, especially regarding important cultural heritage sites and high-value landscapes. This suggests a potential understatement of the visual impact, calling into question the reliability of the

assessment itself.

Additionally, there is a lack of analysis concerning the interconnectedness of the landscape, seascape, and cultural heritage. Heritage sites like the Calanais Standing Stones and other Scheduled Monuments are integral to the wider landscape, linked by visual and spatial relationships to the Atlantic horizon. Treating these sites as isolated entities disregards their interdependence, leading to an incomplete assessment of impacts on their setting and cultural importance.

The proposed industrialisation of the seascape threatens to sever these relationships, altering how heritage assets are perceived and disrupting their connection to the natural horizon. This results in not just a visual impact, but a deeper cultural and spatial harm that the application fails to adequately consider.

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

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

In summary, the assessment fails to accurately depict the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a trustworthy evaluation, reinforcing the conclusion that the proposal is fundamentally incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The deficiencies in the assessment of construction and pollution risks are significant, rendering it materially incomplete and lacking the necessary detail to evaluate likely environmental effects. The proposal entails substantial seabed preparation and installation works within a high-energy Atlantic environment, yet it lacks fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that are to be formulated post-consent, thus precluding any meaningful assessment of their adequacy or effectiveness.

The reliance on unspecified future measures raises considerable concerns, especially given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it does not provide

adequate detail on preventative, control, or monitoring measures.

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

Furthermore, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent stage, the application obstructs the evaluation of whether sufficient safeguards are in place to address pollution events. This introduces procedural risk and undermines the capacity of the competent authority to assess environmental protection measures prior to decision-making.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application lacks a thorough assessment of onshore infrastructure, which is crucial given that the offshore turbines and onshore works are interconnected. By evaluating these components separately, the true scale of environmental and socio-economic impacts is obscured, leading to a fragmented understanding of the project's overall footprint.

Onshore works involve significant undertakings such as cabling across protected moorland, the construction of a substation near Stornoway, and the development of access routes through sensitive landscapes. These activities will require excavation through areas of deep peat, particularly within Barvas Moor, an important carbon store and ecologically sensitive habitat. The current application fails to deliver a comprehensive evaluation of these impacts, which hinders an accurate understanding of the environmental consequences.

By neglecting to assess onshore impacts, the application prevents a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that

all project components be considered collectively; however, the disjointed assessment means that the combined impacts on peatlands, habitats, and local communities remain poorly understood.

There are notable risks to sensitive habitats, including machair systems and peatland environments that are under policy protection. The application does not convincingly show that the impacts on these habitats have been fully examined or that suitable avoidance measures have been implemented. This creates a significant evidential gap regarding biodiversity protection.

Concerns also arise regarding carbon balance, as disturbance of peatland could release stored carbon, potentially leading to a carbon debt that undermines the goals of renewable energy development. The application does not sufficiently address this critical issue or prove that the overall carbon balance remains advantageous.

Moreover, routing infrastructure through active croft land poses potential conflicts with existing land use and legal rights. There is a lack of evidence that necessary consents or processes have been initiated, raising doubts about deliverability and lawful implementation.

From a policy standpoint, the failure to assess the project comprehensively and to demonstrate protection of peatlands, habitats, and land use interests is at odds with the National Marine Plan and National Planning Framework 4. The inability to illustrate 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 supporting evidence on environmental and land use impacts render this part of the application incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of any assessment regarding nocturnal wildlife and dark skies represents a significant evidential gap in the Environmental Impact Assessment. This gap is crucial, considering that the West Lewis coastline is known for its exceptionally dark skies, which play an essential role in environmental quality, cultural identity, and tourism value. The proposal would introduce permanent red aviation lighting, which would be visible over considerable distances. This would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

The application fails to evaluate the implications of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. Given the significance of dark skies to the area's identity and the potential for emerging sectors like astro-tourism, this omission is noteworthy. It results in a substantial gap in the overall assessment of landscape and environmental impacts.

Moreover, there is no evaluation of 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 artificial lighting, leading to disorientation and a heightened risk of collision. The application lacks a lighting impact assessment or any phototaxis study, thereby failing to consider how aviation lighting may affect these species or increase their mortality rates.

The reliance on daytime survey data within the ornithological assessment further complicates matters, as it does not adequately capture nocturnal activity or the associated risks. For instance, Kittiwakes, which may forage or migrate during the night, are also at risk of disorientation from artificial lighting, yet this concern has not been assessed. The lack of site-specific night-time data constitutes a critical shortcoming in understanding ecological impacts.

Without a thorough evaluation of nocturnal effects, it becomes impossible to ascertain whether protected species or designated sites may be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt cannot be achieved, thus invoking the precautionary principle and obstructing a lawful determination.

Additionally, from a policy standpoint, this omission is at odds with National Planning Framework 4, which pertains to the protection of natural places and the preservation of environmental quality. It further undermines the comprehensive assessment of landscape and seascape impacts, as the character of night-time environments is an integral aspect of the overall ecological framework.

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

TOURISM

The Isle of Lewis relies heavily on tourism, with the sector growing from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the local economy. However, the application fails to assess the significant economic and social impacts that the proposed development could have on this key sector. It is acknowledged that 86% of visitors are attracted by the area's scenery, yet there is no quantitative analysis provided to understand how the introduction of large-scale offshore infrastructure might influence visitor numbers, behaviour, or overall economic contribution.

Furthermore, the assessment does not take into account the crucial role that environmental quality plays in supporting tourism. The importance of unspoiled landscapes and dark skies to visitor experiences is essential, particularly for growing markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, resulting in a considerable gap in understanding

the impacts on this recognised and expanding part of the local economy.

In a community with limited economic diversification, the failure to evaluate tourism impacts has 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 adequately evaluated, as mandated by the Islands (Scotland) Act 2018.

From a policy perspective, the application does not demonstrate compliance with the National Planning Framework 4, particularly concerning economic impact and the requirement to show net benefit. It also contradicts strategic objectives that highlight tourism as a priority growth sector, lacking 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 acknowledge the island's economic dependency leads to a significant evidential gap. This deficiency prevents 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 does not meet the requirements for sustainable development according to statutory obligations, national policy, and evidential standards. It raises similar concerns to those that resulted in the refusal of the Lewis Wind Power proposal in 2008, particularly regarding the unacceptable scale of industrialisation. This current application comes under a more stringent policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant gaps in the evidence provided for this application. It lacks comprehensive baseline data and continues to employ an undefined design envelope. Mitigation measures have not been clearly outlined, and key impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism, have been omitted. Consequently, the Environmental Impact Assessment is incomplete, failing to clarify likely significant effects or residual impacts.

Procedural shortcomings are also apparent. The missing Island Communities Impact Assessment violates the statutory duty under the Islands (Scotland) Act 2018, and the incomplete Social Impact Assessment further complicates matters. These issues hinder the competent authority's ability to assess effects on community wellbeing, cultural identity, and economic resilience, making the application unsuitable for determination.

The proposal contradicts the National Planning Framework 4 by not adequately protecting biodiversity, natural areas, 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 modelling. Moreover, the

cumulative impacts of both offshore and onshore components have not been thoroughly evaluated, obscuring their effects on peatlands, carbon balance, habitats, and crofting land.

There are uncertainties regarding environmental risks that could be significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in certain areas. The necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been achieved, which invokes the precautionary principle and prevents a lawful conclusion regarding acceptable impacts.

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

In summary, the application is unfit for determination both procedurally and substantively. The lack of information, combined with conflicts with policy and unresolved environmental risks, obstructs a lawful and evidence-based decision. Therefore, the competent authority must either refuse consent for this application or invoke the appropriate regulatory provisions to obtain the missing information.

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

Additional Comments

As a native of the western isles who returns frequently to both visit family and enjoy the beautiful landscape I have concerns over the impact of this development, in particular due to its excessive scale.
Both visual and noise impact are a major concern for locals and tourism which is a huge income to those living on the island.
The impact of construction to the marine habitat is an additional significant concern.
It does not appear there will be sufficient gain in terms of either green power or economic value, especially to those living locally to it, to justify the disruption to wildlife, habitat and people's lives.

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: 66594EC9

Member of the public 1105

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

Dear Sir/Madam

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

The application is deficient in providing an adequate evidential basis for a lawful determination. It lacks critical environmental data, presents limited and inconsistent baseline information, and leaves key aspects of the proposal undefined. The employment of a flexible design framework obscures understanding of potential significant effects, while the reliance on unspecified mitigation measures means their effectiveness cannot be evaluated. Consequently, the documentation does not facilitate a comprehensive or informed assessment of environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust evidential support.

Furthermore, the proposal presents clear and substantial conflicts with existing policy. It appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It fails to demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly impact the statutory tests necessary for consent, undermining the ability of the competent authority to determine the acceptability of the development from a policy perspective.

The scale of the proposal is unprecedented for this area, with large turbines proposed in close proximity to the shoreline, raising significant issues regarding landscape capacity, visual dominance, and environmental impact. Collectively, the lack of sufficient information, the reliance on undefined mitigation measures, evidential shortcomings, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. In light of these factors, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The 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 assessment of alternatives presented in this application is fundamentally flawed and fails to adhere to the statutory requirements of the Environmental Impact Assessment regime. Instead of delivering a coherent and reasoned evaluation of

realistic alternatives with regard to environmental impacts, the application merely recounts the project's development history. This lack of structured analysis does not illustrate that less harmful alternatives have been adequately identified, assessed, and chosen over more damaging options.

Moreover, there is a distinct absence of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not show that the developer has genuinely considered positioning the turbines further offshore, a move that could potentially mitigate visual, ecological, and coastal impacts. Considering the sensitivity of the West Lewis coastline, where proximity to shore is crucial in assessing impact, the lack of such an analysis undermines any assertion that the proposed siting is the least damaging option.

These shortcomings are evident in the evaluation of cable routing and landfall, where there is inadequate evidence that alternative paths have been thoroughly investigated to minimise impacts on sensitive areas. This includes vital sites of cultural and spiritual significance, such as Barvas Cemetery. The absence of a clear strategy to avoid such impacts, alongside the lack of comparative analysis, reveals that the principle of mitigation by design has not been properly implemented, leading to an over-reliance on remedial measures after the design phase.

Consequently, the application does not convincingly demonstrate that environmental harm has been reduced through appropriate site selection, layout, and infrastructure routing. This failure to adhere to the established mitigation hierarchy obstructs the competent authority's ability to ascertain whether there are less harmful and more suitable alternatives available. A robust assessment of alternatives is essential; without it, it cannot be determined that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this inadequacy jeopardises alignment with National Planning Framework 4, particularly regarding the protection of natural environments, cultural heritage, and community wellbeing. The omission of a structured and comparative assessment is a significant flaw, which further contributes to the conclusion that the application has not been sufficiently evaluated and is unable to support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species lacks the necessary detail and reliability to understand ecological receptors in the West Lewis coastal environment, which is a biologically active and highly sensitive marine system. The baseline data provided is incomplete, and the methodologies used do not effectively capture the presence, behaviour, and habitat use of local species. Consequently, the assessment fails to establish a sound evidential basis for evaluating impacts.

A significant shortcoming is the inadequate recognition and assessment of otters, a

European Protected Species, and their active use of coastal areas for foraging and movement. The absence of an analysis of their core foraging range and behavioural patterns means that the potential effects of construction disturbances, noise, and increased activity have not been thoroughly evaluated. This gap undermines conclusions regarding the absence of significant effects on this species.

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

These methodological flaws result in conclusions regarding negligible or non-significant effects that are grounded in assumptions rather than robust evidence. The lack of adequate baseline data also obstructs meaningful assessments of cumulative and indirect impacts, including seasonal variation and broader ecosystem interactions. This introduces uncertainty about the true scale of risk faced by marine species and habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application fails to demonstrate that internationally important seabird populations will not be adversely affected, which places the proposal in direct conflict with national policy. Significant gaps in evidence and internal inconsistencies undermine the conclusions of the ornithological assessment, which is materially flawed. The west coast of the Isle of Lewis, known for its internationally significant seabird populations, faces potential threats as many species are already in decline. Furthermore, the development is situated within key foraging areas and migratory pathways, yet the assessment does not adequately evaluate the implications of displacement, collision risk, or habitat loss.

A fundamental contradiction arises in the application, as the developer claims no

significant adverse effects while also advancing a Habitats Regulations derogation case, which is only necessitated when significant harm is anticipated. This inconsistency raises concerns about the reliability of the assessment, suggesting that the conclusions drawn are not substantiated by the underlying evidence. The evaluation fails to sufficiently address the potential impact on seabirds associated with protected sites such as the Lewis Peatlands and St Kilda. The importance of these feeding grounds has not been fully accounted for, and reliance on modelling introduces uncertainty, particularly for species in severe decline, including Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, especially given the incomplete baseline data and the lack of understanding regarding behavioural responses.

The siting of turbines within a recognised migratory corridor creates an additional risk by effectively forming a barrier along a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not thoroughly assess the long-term implications of sustained mortality within this corridor or the potential effects on species with relatively small global populations. From a regulatory perspective, the evidential threshold required to determine no adverse effect on the integrity of protected sites has not been met. 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 achieved. This invokes the precautionary principle and impedes a lawful conclusion in support of consent.

Overall, the deficiencies identified reflect a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. Taken collectively, the shortcomings render the assessment unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence, ultimately preventing a robust evaluation of impacts and indicating that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

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

Moreover, the application fails to consider intangible cultural heritage, which includes

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

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency in the assessment of social impacts, health, and wellbeing is a serious concern. The developer has commissioned a Social Impact Assessment that included focus groups with local residents, but the full report has not been released. This creates a significant evidential gap, leaving both the public and the competent authority unable to grasp the full extent of the social risks identified through the developer's research.

Available summaries show that residents are facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts stem from direct engagement with the community and are not mere speculation. However, without access to the complete assessment, it is impossible to scrutinise the findings thoroughly, which limits the ability to evaluate their significance in the decision-making process.

Furthermore, there is evidence suggesting that the proposal poses a direct threat to community identity and cohesion, as "cultural loss" has been highlighted in the developer's findings. Despite this acknowledgment, such impacts have not been adequately integrated into the main application or given the necessary consideration. The failure to disclose the complete Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health impacts is crucial for developments of this size, especially when community character and functioning are at stake. By withholding the complete dataset, the application does not provide a comprehensive evidential basis for weighing benefits against harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Development should promote positive health outcomes and avoid harm, yet the evidence available indicates existing negative effects that have not been fully reported. Without the full assessment, compliance with this policy remains unproven.

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

In summary, the non-disclosure of the complete Social Impact Assessment, coupled with evidence of existing adverse impacts, results in an incomplete and unreliable assessment. This hinders a lawful determination and reinforces the conclusion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is inadequate and does not sufficiently capture the extent of change or the sensitivity of the environment involved. The character of the West Lewis coastline is shaped by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. The proposed large-scale turbines, positioned close to the shoreline, would establish an industrial presence that is continuous and dominant, fundamentally transforming this character and leading to a permanent and irreversible alteration of the landscape.

Moreover, the application fails to represent the scale of visual change accurately. The size and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, thereby directly impacting visual amenity and diminishing the essential qualities of naturalness and remoteness. This level of impact and its significance in the context of such a sensitive landscape has not been properly conveyed.

Concerns also arise regarding the methodology used in selecting and presenting visual

viewpoints. Evidence indicates that the viewpoints chosen may not adequately depict the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and valued landscapes. This deficiency introduces a risk that the magnitude of visual impact has been understated, thereby calling into question the reliability of the assessment.

Another significant shortcoming is the lack of evaluation of 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, linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these heritage assets as isolated, failing to acknowledge their interdependence, which results in an incomplete understanding of the impacts on their settings 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 constitutes a visual impact but also entails broader cultural and spatial harm that has not been adequately addressed in the application.

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

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 overwhelmingly dominant and unavoidable. Consequently, the resulting change is fundamental and permanent, incapable of being reduced to an acceptable level through mitigation.

In conclusion, the assessment inadequately represents the magnitude of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These deficiencies hinder a reliable evaluation and bolster the argument that the proposal is incompatible with the protection of this valuable landscape.

CONSTRUCTION AND POLLUTION RISKS

The application does not provide adequate detail to evaluate the likely environmental effects of the proposed construction and pollution risks. It involves significant seabed preparation and installation works in a high-energy Atlantic environment, yet lacks fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are to be prepared after consent has been granted, which hampers any meaningful assessment of their effectiveness or adequacy.

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 at risk of sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and potential accidental chemical or oil spills, it does not supply sufficient information on prevention, control, or monitoring strategies.

There remains uncertainty about the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. Without comprehensive modelling and clearly outlined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also applies to the potential effects on marine species and habitats that are already recognised as sensitive within the broader assessment.

The lack of detailed emergency response procedures further exacerbates these issues. By postponing contingency planning to a stage following consent, the application limits the evaluation of whether suitable safeguards exist to address pollution events. This deferral introduces procedural risk and diminishes the capability of the competent authority to assess environmental protection measures effectively at the point of determination.

From a regulatory standpoint, the postponement of critical environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be evaluated before consent can be granted, and when such information is lacking, a lawful determination cannot occur. The application also falls short in demonstrating compliance with policy requirements concerning environmental protection and water quality.

Overall, the deficiencies in defined mitigation measures, the absence of detailed management plans, and uncertainty regarding potential impacts lead to a materially inadequate assessment. These flaws inhibit 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 vibrant marine ecosystem and an active fishing industry. The application fails to provide a robust evaluation of the ecological or socio-economic impacts, raising significant concerns about the protection and maintenance of these habitats and uses without substantial disruption. A critical issue lies in the assumption that fishing activities can be displaced without consequences. There is no evidence presented that alternative fishing grounds are available or capable of sustaining additional pressure. This lack of information is important, as the risk of overfishing in different areas poses potential wider economic implications for the local fleet.

Moreover, the proposal introduces considerable risks to marine species, particularly due to underwater noise from construction activities. The high-energy hammer piling anticipated over a prolonged period is expected to disturb marine life over extensive

areas, notably affecting species such as dolphins. The predicted disturbance to a significant portion of the local bottlenose dolphin population raises serious issues, yet the application inadequately addresses the severity of these impacts without adequate supporting evidence.

Additionally, there exists an inconsistency within the application regarding the need for licences to permit harm to European Protected Species, while simultaneously minimising the anticipated impacts as negligible. This contradiction calls into question the credibility of the assessment and raises concerns regarding adherence to the Habitats Regulations, especially where harm is anticipated to a level necessitating legal authorisation.

The assessment also overlooks the cumulative impacts stemming from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. Without an inclusive evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

In summary, the deficiencies highlighted—particularly the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and internal inconsistencies—render the assessment incomplete and unreliable. These gaps obstruct a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment regarding onshore infrastructure is notably inadequate, failing to capture the full range of impacts resulting from a single, integrated project. The offshore turbines and the associated onshore works are fundamentally interconnected; however, they have been evaluated separately, leading to a disjointed approach that obscures the true extent of environmental and socio-economic repercussions.

Onshore components entail cabling across designated protected moorland, the establishment of a substation near Stornoway, and the requisite access infrastructure traversing sensitive landscapes. These construction activities involve excavation in areas of deep peat, particularly within Barvas Moor, a crucial carbon store and an ecologically sensitive area. The application lacks a thorough assessment of these impacts, thereby hindering a complete understanding of the project's overall environmental footprint.

By omitting or postponing the assessment of onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates the consideration of all project components in

conjunction, yet the division between offshore and onshore elements results in a lack of clarity regarding the combined impacts on peatlands, habitats, and local communities.

There are substantial risks posed to vulnerable habitats, including machair systems and peatland environments, which are under policy protection. The application fails to prove that impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, indicating a significant gap in the evidence relating to biodiversity protection.

Moreover, concerns arise regarding the carbon balance associated with the proposal. The disturbance of peatland has the potential to release stored carbon, which could lead to a carbon debt and contradict the goals of renewable energy development. The application does not sufficiently address this concern or demonstrate that the overall carbon balance remains advantageous.

Furthermore, routing infrastructure through active croft land presents possible conflicts with existing land uses and legal rights. The application does not provide evidence that the necessary consents or processes have been initiated, thereby raising doubts about its feasibility and lawful execution.

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

In summary, the disconnection of project components, the absence of a comprehensive assessment, and the insufficient evidence on environmental and land use impacts render this section of the application incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposed application lacks a comprehensive assessment of dark skies and nocturnal wildlife, which is a significant oversight in the Environmental Impact Assessment. The West Lewis coastline is noted for its exceptionally dark skies, which contribute greatly to the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting visible over long distances would create an intrusive "wall of light" effect on the western horizon, fundamentally changing the night-time environment.

There is no analysis of how this lighting will affect visual amenity, landscape character, or the experiences of residents and visitors. This gap is particularly concerning given the crucial role dark skies play in the area's identity and the growth of tourism sectors such as astro-tourism. The failure to examine these impacts represents a clear deficiency in the overall assessment of the landscape and environment.

The application also neglects to evaluate the effects on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly vulnerable to artificial lighting due to their phototactic behaviour, which can cause disorientation and heighten collision risks. Without a lighting impact assessment or phototaxis study, the proposal fails to consider how aviation lighting could affect these species or increase mortality rates.

This shortcoming is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activity and related risks. Other species, such as Kittiwakes, may also forage or migrate at night and are susceptible to disorientation caused by artificial lighting. The lack of site-specific night-time data leads to a critical deficiency in understanding ecological impacts.

In the absence of an evaluation of nocturnal effects, it remains impossible to ascertain whether protected species or designated sites would suffer adverse impacts. 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 National Planning Framework 4 concerning the protection of natural places and environmental quality. It also diminishes the overall assessment of landscape and seascape impacts, as the character of night-time is an essential aspect of the environment.

Overall, the failure to assess dark skies and nocturnal wildlife results in a significant evidential gap. The absence of baseline data, impact modelling, and specific analysis of affected species leaves the application incomplete and unable to support a lawful determination.

TOURISM

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

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

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

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

From a policy standpoint, the application does not illustrate compliance with National Planning Framework 4, particularly concerning economic impact and the necessary demonstration of net benefit. It also contradicts strategic objectives that designate tourism as a priority growth sector, failing to provide adequate evidence for the competent authority to evaluate the economic implications of the proposal.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates a significant failure to adhere to the principles of sustainable development as required by statutory obligations, national policy, and evidential standards. This application presents the same core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. It is now submitted under a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are substantial deficiencies in the evidential basis provided for this application. Critical gaps exist in baseline data, and the use of an undefined design envelope raises concerns. The application relies on unspecified mitigation measures and fails to account for significant impact pathways, including those affecting nocturnal wildlife, onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment lacks completeness and does not facilitate a comprehensive understanding of potential significant effects or residual impacts.

Moreover, there are evident procedural shortcomings. The lack of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty as per the Islands (Scotland) Act 2018. Furthermore, the failure to present a complete Social Impact Assessment is a notable omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and

economic resilience, rendering the application unsuitable for determination.

The proposal stands in direct opposition to National Planning Framework 4. It fails to provide assurances for the protection of biodiversity, natural environments, and cultural heritage. It does not demonstrate that health and wellbeing impacts are acceptable, nor can it substantiate a net economic benefit due to missing tourism impact modelling. The cumulative effects of both offshore and onshore elements remain improperly assessed, which obscures potential impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertainties regarding environmental risks remain significant. Assessments of marine ecology, seabirds, protected species, and marine mammals are either incomplete or internally inconsistent. The evidential threshold necessary to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

This proposal would also bring about substantial and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual relationships, and the repercussions on tourism would result in permanent effects that cannot be adequately mitigated.

Collectively, the application is both procedurally and substantively unfit for determination. The combination of information deficiencies, policy conflicts, and unresolved environmental risks obstructs a lawful, evidence-based decision. The competent authority must either refuse consent on these grounds or invoke 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 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: 9FAB4754

Member of the public 1106

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

Dear Sir/Madam

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

The application does not provide an adequate evidential basis for a lawful determination. There is a lack of critical environmental data, while baseline information is both limited and inconsistent. Moreover, key aspects of the proposal remain undefined. The flexible design framework complicates the assessment of likely significant effects, and reliance on unspecified mitigation measures means their effectiveness cannot be evaluated. Consequently, the documentation does not facilitate a comprehensive understanding of the environmental, cultural, or community impacts, with claims of negligible or non-significant effects unsupported by robust evidence.

There are evident and serious policy conflicts present. The proposal does not appear to comply with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4. These conflicts are especially pertinent in relation to biodiversity, natural environments, cultural heritage, and health and wellbeing. The application fails to demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests necessary for consent and impair the competent authority’s capacity to determine the development's acceptability within policy frameworks.

The unprecedented scale of the proposal, with large turbines positioned in close proximity to the shoreline, gives rise to considerable concerns regarding landscape capacity, visual dominance, and environmental repercussions. Collectively, the lack of sufficient information, reliance on undefined mitigation measures, evidential inadequacies, and clear non-compliance with policy highlight that the application is incomplete and unable to support a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks crucial information and does not offer a full, transparent, or reliable account of the likely environmental effects associated with the proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations of turbines, creates significant uncertainty. This variability undermines the integrity of the assessment and means that the impacts outlined may not correspond to the actual development that would be constructed. Consequently, both the public and the competent authority are left without a clear understanding of the true extent of environmental effects.

Additionally, the application places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent based on the promise that environmental harm will be addressed later prevents a meaningful evaluation of these measures' effectiveness or an accurate assessment of residual impacts. This deferral of essential information to post-consent phases is procedurally unacceptable and contradicts the intentions behind the Environmental Impact Assessment regime, which demands that significant effects and mitigation strategies be clearly established before determination.

There are also serious evidential gaps within the report, which include deficiencies in baseline data, limitations in methodology, and an over-reliance on assumptions instead of site-specific evidence. Such shortcomings lead to uncertainty surrounding the scale and significance of impacts, particularly where conclusions of negligible or non-significant effects are drawn without robust supporting data. The lack of adequate information hinders a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot comply with statutory obligations.

As a result, the application does not meet the evidential threshold stipulated under the Habitats Regulations, which is necessary to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate compliance with National Planning Framework 4, including the requirements for biodiversity protection and environmental integrity, as it has not been shown that impacts have been fully evaluated or that appropriate safeguards are established.

In summary, the combination of an undefined design envelope, a lack of specified mitigation, and insufficient baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These significant deficiencies impede a lawful and thorough assessment of environmental effects and leave the competent authority unable to make an informed decision based on the information presented.

ASSESSMENT OF ALTERNATIVES

The application proposes a development that inadequately assesses alternatives, failing to comply with the statutory requirements of the Environmental Impact

Assessment regime. Instead of offering a structured and reasoned comparison of viable alternatives based on environmental impacts, it presents a narrative of project evolution. This method does not convincingly demonstrate that less harmful options have been properly identified, assessed, and selected over more damaging alternatives.

The absence of a transparent or evidence-based comparison of offshore locations, development scales, or design configurations is particularly concerning. Notably, the application does not show that the developer has genuinely considered the placement of turbines further offshore, where potential visual, ecological, and coastal impacts could be mitigated. Given the sensitivity of the West Lewis coastline and the critical importance of proximity to shore in assessing impact, the lack of such an analysis prevents any conclusion that the proposed siting is the least damaging option available.

These shortcomings are evident in the cable routing and landfall assessment as well, where there is insufficient evidence that alternative routes have been properly examined to avoid or reduce impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The failure to establish a clear avoidance strategy, along with the lack of comparative analysis, suggests that mitigation by design has not been adequately employed, relying instead on measures to be implemented after the design phase.

Consequently, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This neglect signifies a failure to adhere to the established mitigation hierarchy and obstructs the competent authority's ability to ascertain whether there exist less harmful and more appropriate alternatives. Without a thorough alternatives assessment, it cannot be asserted that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this inadequacy undermines compliance with National Planning Framework 4, particularly regarding the protection of natural areas, cultural heritage, and the wellbeing of communities. The absence of a structured and comparative assessment represents a material omission that significantly detracts from the overall conclusion that the application has not undergone adequate assessment and cannot warrant a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

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

There is a significant omission concerning otters, which are classified as a European

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

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the ornithological assessment associated with the application is materially flawed, containing significant gaps in evidence and internal inconsistencies that undermine its conclusions. The application does not convincingly demonstrate that these species will not be adversely affected, failing to robustly evaluate the implications of displacement, collision risk, or habitat loss, particularly in relation to key foraging areas and migratory pathways.

There is a fundamental contradiction present within the application itself. While the developer concludes that there will be no significant adverse effects, they simultaneously advance a Habitats Regulations derogation case, which is required only

when significant harm is anticipated. This inconsistency raises serious questions about the reliability of the assessment and suggests that the conclusions drawn are not adequately supported by the underlying evidence.

Moreover, the assessment does not provide sufficient evidence 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 acknowledged, and the reliance on modelling approaches introduces uncertainty, especially for species that are in severe decline, including Kittiwakes and Fulmars. The methodologies employed appear likely to underestimate mortality rates, particularly where baseline data is lacking and behavioural responses are not comprehensively understood.

The siting of turbines within a recognised migratory corridor also introduces a considerable risk, effectively creating a barrier in a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term implications of sustained mortality within this corridor or the potential effects on species with relatively small global populations.

From a regulatory standpoint, the application fails to meet the evidential threshold needed to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This engages the precautionary principle, thus preventing a lawful conclusion in favour of consent.

The identified deficiencies also 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 inconsistency, methodological weaknesses, and insufficient evidence. These shortcomings hinder a robust evaluation of the impacts, leading to the conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The application fails to meet essential requirements in its assessment of cultural heritage and community identity, particularly concerning the West Lewis coastline, which should be recognised as a living cultural landscape where environment, language, tradition, and community are interconnected. The approach taken is overly simplistic, viewing heritage merely as isolated, static assets and neglecting their ongoing social, cultural, and spiritual functions within the community.

A significant oversight is the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are not only places of burial but also active venues for spiritual practice. By categorising them as static features, the

assessment overlooks their ongoing use, significance, and the development's potential impact on their surroundings. This mischaracterisation leads to an insufficient evaluation of cultural effects and ignores their vital role in community life.

Additionally, the assessment does not address intangible cultural heritage aspects, including the Gaelic language, local traditions, and the long-established relationship between the community and the coastal environment. These factors are essential to the area's identity, yet they are entirely absent from the evaluation, representing a considerable gap. Without addressing these elements, the cultural impact of the development remains unclear.

Concerns also arise regarding the rights of the community and their engagement in the process. The Gaelic-speaking population, with its unique cultural identity and characteristics of an Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the credibility of the assessment and disregards established principles of participation in decisions that affect cultural and environmental interests.

A further procedural shortcoming 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 impacts on the island community. This omission is significant enough to prevent a lawful determination.

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

In summary, the failure to evaluate living heritage, intangible cultural value, community rights, and compliance with statutory obligations results in a substantial evidential gap. The cultural impacts of the development have not been adequately assessed, and the application fails to provide a sound basis for determining the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The social impacts, health, and wellbeing assessment associated with the development is significantly lacking in transparency and substance. Although the developer commissioned a Social Impact Assessment that included local resident focus groups, the full report has not been made available. This omission creates a critical evidential gap, limiting public understanding and hindering the competent authority's ability to evaluate the social risks identified in the developer’s own research.

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

development. These impacts are the result of direct engagement with the community and are not based on speculation. However, the absence of the complete assessment restricts thorough scrutiny of these findings and undermines efforts to assess their significance during the decision-making process.

Moreover, there is evidence suggesting that the proposal is seen as a threat to community identity and cohesion, with the developer's findings indicating a risk of "cultural loss." Despite these serious concerns, the full impacts have not been adequately addressed in the main application, nor have they been given the appropriate consideration. The failure to disclose the complete Social Impact Assessment obscures the true social and human costs associated with the development.

This lack of transparency also compromises the Environmental Impact Assessment process. For developments of this magnitude, a comprehensive understanding of social, economic, and health impacts is vital, particularly when community character and functioning might be affected. The failure to provide the complete data set results in the application lacking a solid evidential foundation necessary for weighing the benefits against potential harms.

From a policy viewpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Developments should promote positive health outcomes and mitigate harm. The evidence currently available suggests existing adverse effects that have not been fully revealed. Without the complete assessment, demonstrating compliance with this policy is impossible.

Procedurally, the implications are significant. 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 substantial 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 full Social Impact Assessment, coupled with the evidence of existing adverse effects, results in an incomplete and unreliable assessment. This situation hampers lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual, seascape, and landscape impacts is significantly lacking, failing to capture the extent of change or the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by its open Atlantic views, undeveloped nature, and pronounced remoteness. The introduction of large-scale turbines near the shoreline would create an unbroken and prominent industrial presence, fundamentally changing this character and leading to a permanent alteration of the landscape.

Moreover, the application does not fully portray the magnitude of this visual change. Given the size and proximity of the turbines, they would overshadow views from

residential areas, historic sites, and frequently visited coastal locations. This would adversely affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not adequately articulate this level of impact or its importance within the context of such a delicate landscape.

There are also serious methodological issues regarding the choice and presentation of visual viewpoints. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and valued landscapes. This raises the possibility that the extent of visual impact has been underestimated, thereby compromising the reliability of the assessment.

Another significant shortcoming is the lack of consideration for the interconnected relationship between landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape that is visually and spatially linked to the Atlantic horizon. The assessment regards these as separate entities rather than acknowledging their interconnections, leading to an incomplete appraisal 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 perceived and severing their connection to the natural horizon. This represents not only a visual impact but also broader cultural and spatial harm that has not been thoroughly evaluated in the application.

From a policy standpoint, the proposal is at odds with National Planning Framework 4, which pertains to the protection of natural environments and historic assets. The scale of proposed changes is inconsistent 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 policy adherence.

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

In summary, the assessment does not accurately depict the impact scale, the environment's sensitivity, or the interdependent nature of landscape and heritage. These deficiencies hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The 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 proposal introduces considerable risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over an extended period is expected to cause disturbances over large distances, impacting species such as dolphins. Concerns arise from the predicted disruption to a significant portion of the local bottlenose dolphin population; however, the application tends to downplay these effects without adequate supporting evidence.

An assessment of fisheries and marine life is critically lacking, as it does not provide a

thorough evaluation of ecological or socio-economic impacts. The waters off the West Lewis coast sustain both a diverse marine ecosystem and an active fishing industry. Yet, the application fails to illustrate how these vital uses and habitats can be safeguarded or sustained without substantial disruption. There is a fundamental issue with the assumption that fishing activity can be displaced without consequences. The application offers no evidence that alternative fishing grounds are available, accessible, or capable of withstanding additional pressure. This omission is crucial, as displacing fishing could lead to overfishing in other areas and might result in broader economic repercussions for the local fleet. A clear and evidence-based assessment is necessary to comprehend the impacts on fisheries and livelihoods properly.

Moreover, the application shows an inconsistency regarding the need for licences to permit harm to European Protected Species while simultaneously declaring the impacts as negligible. This contradiction severely undermines the credibility of the assessment and raises concerns about adherence to the Habitats Regulations, particularly when harm is anticipated to such a degree that it requires legal authorisation.

Additionally, the assessment neglects to address cumulative impacts stemming from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, it is impossible to 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 and the National Marine Plan. It does not provide evidence that the development can coexist with existing marine users or prevent unacceptable impacts on marine biodiversity, which obstructs any conclusion that the proposal represents sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed project presents serious concerns regarding the integrity of its environmental assessment. The assessment of onshore infrastructure is materially incomplete, as it fails to consider the full extent of impacts from what is fundamentally a single integrated project. The offshore turbines and onshore works are intrinsically linked, yet they are evaluated separately, resulting in a fragmented approach that conceals the actual scale of environmental and socio-economic effects.

Key onshore elements include the installation of cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. These activities involve excavation in areas

of deep peat, particularly within Barvas Moor, an important carbon store and ecologically sensitive habitat. The application does not offer a thorough assessment of these impacts, thereby hindering a complete understanding of the project's overall environmental footprint.

By neglecting or postponing the assessment of onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components are considered as a whole. However, the separation of offshore and onshore elements means the combined impacts on peatlands, habitats, and local communities are inadequately understood.

There are notable risks posed to sensitive habitats, including machair systems and peatland environments, which are protected by policy. The application fails to demonstrate that impacts on these habitats have been fully assessed or that suitable avoidance measures have been taken. This creates a significant evidential gap regarding biodiversity protection.

Moreover, the proposal raises alarm over carbon balance. Disturbance of peatland releases stored carbon, potentially creating a carbon debt that is at odds with the goals of renewable energy development. The application does not sufficiently address this concern or show that the overall carbon balance remains positive.

The routing of infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. There is no evidence provided that the necessary consents or processes have been initiated, which raises serious questions about the deliverability and lawful implementation of the project.

From a policy standpoint, the failure to assess the project comprehensively and to ensure protection for peatlands, habitats, and land use interests contradicts the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be avoided or mitigated further undermines the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment lacks an assessment of dark skies and nocturnal wildlife, which constitutes a significant omission. The coastline of West Lewis is characterised by its exceptionally dark skies, integral to the area's environmental quality, cultural identity, and tourism appeal. The proposed introduction of permanent red aviation lighting, which would be visible over extensive distances, is anticipated to create a continuous and intrusive "wall of light" across the western horizon, fundamentally altering the night-time environment.

There is no consideration of how this lighting may impact visual amenity, landscape character, or the experiences of residents and visitors. This is particularly significant given the critical role of dark skies in the local identity and the growing sectors of astro-tourism. The failure to evaluate these impacts highlights a considerable gap in the overall assessment of the landscape and environment.

Equally concerning is the absence of an evaluation concerning nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel exhibit a high sensitivity to artificial lighting due to phototaxis, which can result in disorientation and an increased risk of collision. The application lacks any lighting impact assessment or phototaxis study, failing to address how the proposed aviation lighting could affect these species or contribute to increased mortality rates.

This shortfall is exacerbated by the reliance on daytime survey data within the ornithological assessment, which does not adequately capture nocturnal activity or associated risks. For instance, Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this risk has not been evaluated. The failure to provide site-specific night-time data creates a crucial gap in the understanding of ecological impacts.

Without a thorough assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites might face adverse effects. The evidential standard needed to exclude adverse effects beyond reasonable scientific doubt remains unfulfilled, necessitating the application of the precautionary principle and precluding a lawful determination.

From a policy standpoint, these omissions contravene the National Planning Framework 4 in terms of protecting natural environments and ensuring environmental quality. Furthermore, this lack of assessment undermines the comprehensive evaluation of landscape and seascape impacts, given that the character of the night-time environment is a vital aspect of the overall ecosystem.

In summary, the failure to assess dark skies and nocturnal wildlife creates a substantial evidential gap. The application is incomplete, lacking essential baseline data, impact modelling, and species-specific analyses, rendering it inadequate for supporting a lawful determination.

TOURISM

The 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 demonstrates a critical failure to meet the standards of sustainable development when evaluated against statutory requirements, national policy, and necessary evidence. 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 identified. Now, it is being presented under a policy framework that places increased emphasis on biodiversity, peatland preservation, landscape integrity, and the wellbeing of the community.

There is a lack of a complete and reliable evidential foundation for making a

determination on this application. Significant gaps in baseline data persist, accompanied by the use of an undefined design envelope. The reliance on unspecified mitigation measures and the failure to include crucial impact pathways—such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism—are apparent. Consequently, the Environmental Impact Assessment is inadequate, failing to provide a thorough understanding of the significant effects or residual impacts that may arise.

Furthermore, procedural shortcomings are evident. The absence of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty as outlined in the Islands (Scotland) Act 2018, while the failure to present a complete Social Impact Assessment signifies a material omission. Such inadequacies 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 also stands in opposition to National Planning Framework 4, lacking demonstration of biodiversity protection, safeguarding of natural areas, and preservation of cultural heritage. It fails to show that the health and wellbeing impacts are acceptable and cannot prove a net economic benefit due to the lack of tourism impact modelling. The cumulative impacts of both offshore and onshore components have not been thoroughly evaluated, obscuring consequences for peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and occasionally inconsistent with one another. The evidential threshold necessary to discount adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and obstructing a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is procedurally and substantively unsuitable for determination. The significant information deficiencies, along with conflicts with policy and unresolved environmental risks, preclude a lawful and evidence-based decision. The competent authority must reject this application or invoke the appropriate regulatory measures to compel 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.

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: 4E122773

Member of the public 1107

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

Dear Sir/Madam

This letter represents a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under the marine licensing and Environmental Impact Assessment regimes. The concerns stem from a review of the Environmental Impact Assessment Report, which reveals significant deficiencies in planning, environmental protection, cultural preservation, and procedural integrity. The proposed site is located off the west side of the Isle of Lewis, an area recognised for its stunning Atlantic-facing coastline, near-pristine environment, and rich cultural identity. The proposal's scale and design, particularly its proximity to the shore, raise urgent questions about its alignment with statutory requirements, national policy, and the principles of sustainable development.

A critical issue with the application is the lack of a solid evidential basis for any lawful determination. Important environmental data has been omitted, baseline information is both limited and inconsistent, and vital aspects of the proposal remain undefined. This flexible design framework complicates the assessment of potential significant effects, while the unspecified mitigation measures leave their effectiveness unexamined. Consequently, the supporting 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 notable policy inconsistencies. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate that it can satisfy national requirements to protect biodiversity, climate interests, and environmental integrity. These inconsistencies directly affect the statutory tests for consent and compromise the ability of the competent authority to assess the development's acceptability in terms of policy.

The unprecedented scale of this project, featuring large turbines situated near the shoreline, generates significant worries about landscape capacity, visual dominance, and overall environmental impact. When considering the combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance, it becomes evident that the application is incomplete and unfit for lawful determination. In light of these serious concerns, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary detail and transparency to provide a reliable understanding of the environmental effects associated with the proposal. The introduction of a flexible Project Design Envelope, which avoids committing to specific turbine dimensions, layouts, or configurations, creates significant uncertainty. This uncertainty compromises the integrity of the assessment, rendering the presented impacts potentially unreflective of the actual development that may be constructed. As a result, both the public and the competent authority are left without a clear understanding of the true extent of environmental effects.

Moreover, the application heavily relies on unestablished mitigation measures, monitoring strategies, and management plans, which are yet to be defined. Seeking consent on the basis that environmental harm will be mitigated at a later stage hinders any meaningful evaluation of these measures' effectiveness or the assessment of residual impacts. This postponement of critical information to stages following consent is procedurally unacceptable and contradicts the fundamental aims of the Environmental Impact Assessment regime, which mandates that likely significant effects and their mitigations must be clearly established before any determination.

Evidential deficiencies further complicate the assessment, including notable gaps in baseline data and methodological limitations. The reliance on assumptions instead of site-specific evidence raises uncertainty regarding the scale and significance of impacts, especially when negligible or non-significant effects are concluded without adequate supporting data. This lack of sufficient information obstructs a comprehensive understanding of cumulative and worst-case impacts, thus introducing scientific uncertainties that cannot satisfy statutory obligations.

Consequently, the application does not fulfil the evidential standard set by the Habitats Regulations necessary to dismiss adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate compliance with National Planning Framework 4, which includes requirements for biodiversity protection and environmental integrity, as it cannot be conclusively shown that impacts have been thoroughly assessed or that suitable safeguards are in place.

In summary, the combination of an undefined design envelope, unspecified mitigation strategies, and significant gaps in baseline data results in an Environmental Impact Assessment Report that is both unreliable and incomplete. These deficiencies hinder a lawful and robust assessment of the environmental effects, leaving the competent authority unable to make an informed determination based on the information currently available.

ASSESSMENT OF ALTERNATIVES

The evaluation of alternatives in the application is fundamentally insufficient and does not fulfil the legal requirements of the Environmental Impact Assessment process. Instead of offering a systematic and reasoned evaluation of viable alternatives based

on their environmental impacts, the submission provides a narrative description of how the project has developed. This method does not effectively demonstrate that less harmful options have been appropriately identified, assessed, and chosen over more damaging alternatives.

Moreover, there is a lack of transparent and evidence-backed comparison concerning various offshore sites, development scales, or design configurations. The application notably fails to show that the developer has adequately considered positioning turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be minimised. The sensitivity of the West Lewis coastline and the critical nature of proximity to the shore in assessing impact mean that the lack of such analysis hampers any conclusion regarding whether the proposed location is the least damaging choice.

The shortcomings also apply to the assessment of cable routing and landfall, where there is insufficient proof that alternative pathways have been thoroughly examined to prevent or lessen impacts on sensitive sites. This includes locations of cultural and spiritual significance, such as Barvas Cemetery. The absence of a clear strategy to avoid these impacts and the lack of comparative analysis suggest that mitigation by design has not been utilised, leading to a reliance on post-design mitigation measures instead.

Consequently, the application does not adequately prove that environmental harm has been reduced through appropriate site selection, layout, and infrastructure routing. This represents a failure to adhere to the established mitigation hierarchy, which impedes the competent authority's ability to ascertain whether more suitable and less harmful alternatives are available. Without a thorough alternatives assessment, it cannot be confirmed that the proposal is a sustainable or policy-compliant option.

From a policy standpoint, this inadequacy undermines adherence to National Planning Framework 4, particularly concerning the protection of natural areas, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment constitutes a significant omission, contributing to the overall conclusion that the application has not been sufficiently evaluated and cannot support 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 assessment of the proposed development raises significant concerns, primarily due to its internal inconsistencies and the notable gaps in evidence that fundamentally undermine its conclusions. The Isle of Lewis, particularly its west coast, hosts seabird populations of international importance, many of which are already experiencing declines. The application does not sufficiently demonstrate that these species will remain unaffected by the proposed development. Key foraging areas and migratory pathways are integral to these seabirds, yet the implications of potential displacement, collision risks, and habitat loss have not been thoroughly evaluated.

A troubling contradiction exists within the application's findings. While the developer asserts that there will be no significant adverse effects, they concurrently propose a Habitats Regulations derogation case, which is typically warranted only when

significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment and suggests that the conclusions drawn lack solid support from the available evidence. The assessment falls short in providing adequate proof that seabird populations associated with protected sites, such as the Lewis Peatlands and St Kilda, will not be negatively impacted. The critical nature of these feeding grounds is inadequately addressed, and the use of modelling approaches raises uncertainties, particularly regarding species like Kittiwakes and Fulmars that are already in severe decline. Methodologies employed are likely to underestimate mortality rates, especially given the incomplete baseline data and the limited understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor adds another layer of significant risk, as it poses a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The assessment does not provide an adequate evaluation of the long-term consequences of sustained mortality in this corridor, nor does it consider the potential impacts on species with smaller global populations.

From a regulatory standpoint, the application does not satisfy the evidential criteria needed to conclude that there will be no adverse effects on the integrity of protected sites. The presence of conflicting conclusions, coupled with data deficiencies and limitations in modelling, means that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and renders the conclusion in support of consent unlawful.

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

Overall, the assessment is deemed unreliable due to its methodological weaknesses, internal inconsistencies, and lack of sufficient evidence. These shortcomings hinder a comprehensive evaluation of potential impacts and lead to the conclusion that the application does not fulfil the statutory requirements necessary for a valid determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of community identity and cultural heritage is fundamentally flawed, as it does not recognise the West Lewis coastline as a vibrant cultural landscape where environment, tradition, language, and community are interconnected. The approach taken in the application reduces heritage to mere isolated assets, neglecting their ongoing cultural, spiritual, and social significance within the community.

A major shortcoming is the treatment of culturally significant sites, such as the cemeteries located at Dalmore, Bragar, and Barvas. These sites are active burial

grounds and places of spiritual practice, yet they are classified as static features in the assessment. This mischaracterisation fails to account for their continued use, the significance they hold, and the implications of development on their surroundings. Consequently, this results in an incomplete understanding of the cultural effects and ignores their importance to community life.

Moreover, the application overlooks intangible cultural heritage elements, including the Gaelic language, local traditions, and the historical relationship between the community and the coastal environment. These factors are integral to the area's identity, yet they are completely absent from the assessment, creating a significant gap. Without these considerations, the cultural impact of the proposed development cannot be accurately gauged.

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

A critical procedural issue is the failure to conduct a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot legally assess the social, cultural, and economic impacts on the island community. This omission alone renders the determination of the proposal unlawful.

From a policy perspective, these deficiencies place the proposal in direct conflict with National Planning Framework 4, particularly regarding the protection of historical assets and places. The neglect to address both tangible and intangible heritage and to acknowledge living cultural practices represents a significant departure from policy requirements.

In summary, the failure to assess living heritage, intangible cultural value, community rights, and statutory obligations results in a substantial evidential gap. The cultural impacts of the development remain inadequately assessed, and the application does not provide an adequate foundation for evaluating the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

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

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

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

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

In conclusion, the non-disclosure of the complete Social Impact Assessment, in conjunction with the evidence of existing adverse impacts, leads to an incomplete and unreliable assessment. This deficiency obstructs a lawful determination and underscores the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts presented in the application is significantly lacking and does not truly reflect the degree of change or the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by its open Atlantic horizon, undeveloped nature, and a pronounced sense of remoteness. The proposed large-scale turbines, positioned near the shoreline, would impose a continuous and intrusive industrial presence, leading to a fundamental alteration of this character and a permanent, irreversible transformation of the landscape.

There are significant methodological flaws in the selection and representation of visual viewpoints. Current evidence indicates that these viewpoints may not fully capture the most sensitive receptors or the worst-case scenarios, particularly regarding important cultural heritage sites and high-value landscapes. This raises concerns about the possibility that the visual impact has been understated, thereby casting doubt on the reliability of the assessment.

Additionally, the assessment neglects to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Key sites, such as the Calanais Standing Stones and other Scheduled Monuments, form part of a broader landscape context that is visually and spatially linked to the Atlantic horizon. The current evaluation treats these heritage assets in isolation, failing to acknowledge their interdependence and leading to an incomplete understanding of the impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would disrupt these vital connections, altering how heritage assets are perceived and severing their ties to the natural horizon. This not only represents a visual impact but also inflicts a more extensive cultural and spatial harm that has not been adequately addressed in the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, particularly concerning the preservation of natural areas and historical assets. The level of change proposed is fundamentally incompatible with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case scenario assessment further undermines any assertion of policy compliance.

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

In summary, the assessment fails to provide an accurate representation of the scale of impact, the sensitivity of the environment, and the interconnected nature of the landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal does not align with the necessary protections for this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal involves substantial seabed preparation and installation works within a high-energy Atlantic environment. However, the assessment of construction and pollution risks remains incomplete, lacking the detail necessary to evaluate the 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 to be formulated post-consent, which obstructs any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures is particularly concerning due to the sensitivity of the receiving environment. The West Lewis coastline, known for its clean coastal waters and important habitats, is vulnerable to sediment disturbance and contamination. 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.

Furthermore, there is considerable uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and well-defined management strategies, it 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 absence of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application hinders the evaluation of whether suitable safeguards are in place to address pollution events. This introduces procedural risk and diminishes the capacity of the competent authority to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of critical environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation measures are assessed before consent is granted; the absence of such information means a lawful determination cannot be achieved. The application further 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 render the assessment materially deficient. These shortcomings inhibit a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application lacks a thorough assessment of fisheries and marine life, resulting in an inadequate evaluation of ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and a thriving fishing industry, yet the proposal does not provide assurance that these vital habitats and activities can be preserved without causing significant disruption.

A critical concern is the presumption that fishing operations can be relocated without any adverse effects. The application fails to supply evidence that alternative fishing areas are not only available but also accessible and able to accommodate additional

fishing pressure. This gap in information is crucial, as the risk of overfishing in other regions could have wider economic ramifications for the local fishing fleet. The absence of a clear, evidence-based assessment means the impacts on fisheries and local livelihoods remain obscured.

Moreover, the project poses considerable risks to marine species, particularly due to the underwater noise generated during construction activities. The extended high-energy hammer piling is anticipated to disturb marine life over significant distances, including local dolphin populations. Concerns about the potential impact on a large portion of the bottlenose dolphin community have been raised, yet the application downplays these effects without adequate supporting evidence.

There is a marked contradiction within the application, acknowledging the necessity for licenses to permit harm to European Protected Species while simultaneously categorising the impacts as negligible. This inconsistency undermines the credibility of the assessment and raises serious questions about adherence to the Habitats Regulations, especially where anticipated harm necessitates legal clearance.

Additionally, the assessment neglects to consider cumulative impacts resulting from various pressures such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without a comprehensive evaluation of these interconnected effects, the overall repercussions for marine ecosystems and socio-economic conditions cannot be accurately assessed.

From a policy standpoint, the proposal fails to demonstrate alignment with National Planning Framework 4 or the National Marine Plan. It does not provide evidence that the development can coexist with existing marine users or that it can avert unacceptable impacts on marine biodiversity, which prevents any conclusion that the proposal signifies sustainable development.

In summary, the deficiencies regarding evidence on fishing displacement, the underestimation of acoustic impacts, and internal contradictions render the assessment insufficient and unreliable. These shortcomings hinder a robust evaluation of 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 Environmental Impact Assessment lacks any assessment of dark skies and nocturnal wildlife, representing a significant omission. 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 proposal includes permanent red aviation lighting that would be visible over long distances, creating a continuous and intrusive "wall of light" across the western horizon, fundamentally altering the night-time environment.

There is no evaluation of how this lighting will impact visual amenity, landscape character, or the experiences of residents and visitors. This oversight is particularly troubling considering the importance of dark skies to the region's identity and the emerging astro-tourism sector. As a result, the failure to assess these impacts leads to

a notable gap in the overall landscape and environmental evaluation.

Moreover, the proposal does not examine the effects on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly vulnerable to artificial lighting due to their phototactic responses, which can result in disorientation and a higher risk of collisions. The absence of a lighting impact assessment or a phototaxis study means that there is no understanding of how the proposed aviation lighting may affect these species or lead to increased mortality.

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

Without assessing the nocturnal effects, it is impossible to ascertain whether protected species or designated sites would suffer adverse effects. The evidential standard needed to exclude adverse effects beyond reasonable scientific doubt cannot be achieved, invoking the precautionary principle and preventing a lawful determination.

From a policy standpoint, this omission contradicts National Planning Framework 4 regarding the safeguarding of natural areas and environmental quality. It also diminishes the broader assessment of landscape and seascape impacts, as the character of night-time is an essential aspect of the environment.

Collectively, 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 leaves the application incomplete and incapable of sustaining a lawful determination.

TOURISM

The assessment of tourism impacts is critically inadequate and neglects to evaluate the economic and social repercussions for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the region's wild coastline, nearly untouched landscape, dark skies, and sense of remoteness. Although the application notes that 86% of visitors are attracted by the scenery, it fails to provide a quantified analysis of how large-scale offshore infrastructure would influence visitor numbers, behaviours, or overall economic contributions.

Tourism has experienced substantial growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. Nonetheless, the application does not examine how the industrialisation of the seascape and the degradation of environmental quality might affect Tourism Gross Value Added or broader economic resilience. Without such an analysis, it remains unclear if the development would offer a net economic benefit or

harm an established and expanding sector.

The failure to consider the significance of environmental quality in enhancing tourism, including the vital role of unspoiled landscapes and dark skies in shaping visitor experiences and fostering emerging markets like nature-based tourism and astro-tourism, further exacerbates this issue. The lack of a Dark Skies Assessment creates a considerable gap in understanding the potential impacts on this recognised and flourishing aspect of the local economy.

Given the context of an island community with limited economic diversification, the disregard for assessing 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 examined as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly concerning economic impacts 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 consequences of the proposal.

In summary, the failure to quantify tourism impacts, assess environmental factors influencing visitor behaviour, and consider the island's economic dependencies culminates in a significant evidential deficiency. 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 embodies a significant failure to meet the criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. It echoes the critical issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was a key concern. This current proposal is now presented under a policy framework that should place even greater emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are considerable gaps in the baseline data provided, alongside the use of an undefined design envelope and reliance on unspecified mitigation measures. Important impact pathways have been omitted, such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism implications. Consequently, the Environmental Impact Assessment is deficient and does not allow for a comprehensive understanding of likely significant effects or residual impacts.

Procedural shortcomings are evident as well. The lack of a compliant Island Communities Impact Assessment breaches statutory requirements under the Islands (Scotland) Act 2018, while the failure to provide a complete Social Impact Assessment constitutes a significant omission. These shortcomings hinder the competent

authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

In terms of compliance with National Planning Framework 4, the proposal is fundamentally at odds with requirements. It does not adequately protect biodiversity, natural places, or cultural heritage, fails to demonstrate acceptable health and wellbeing impacts, and lacks evidence of a net economic benefit due to insufficient tourism impact modelling. Furthermore, the cumulative impacts of both offshore and onshore components have not been sufficiently assessed, leading to obscured effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties remain around environmental risks, which could be significant. The assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The evidential threshold necessary to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and hindering a lawful determination that impacts are acceptable.

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

In summary, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, combined with conflicts with policy and unresolved environmental risks, inhibit a lawful, evidence-based decision. The competent authority is urged to refuse consent for this application or to invoke relevant regulatory provisions to compel the submission of the necessary information.

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

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: 93AA1146

Member of the public 1108

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 marine licensing and Environmental Impact Assessment considerations. A thorough review of the Environmental Impact Assessment Report and accompanying documents reveals serious deficiencies in planning, environmental, cultural, and procedural aspects. Located off the west coast of the Isle of Lewis, this region is characterised by its Atlantic-facing coastline, relatively untouched environment, and strong cultural significance. The proposal's scale, design, and proximity to the shore raise profound concerns regarding its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a solid evidential foundation necessary for a lawful decision. Essential environmental data is absent, baseline information is inconsistent and limited, and numerous critical elements of the proposal remain unspecified. Furthermore, the reliance on a flexible design framework hinders a clear assessment of potential significant effects, while the unspecified mitigation measures mean their effectiveness cannot be judged. Consequently, the documentation fails to offer a comprehensive understanding of the potential environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by credible evidence.

Additionally, there are significant conflicts with existing policies. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural environments, cultural heritage, and public health. It does not adequately show that national standards for protecting biodiversity, climate interests, and environmental integrity can be upheld. These conflicts directly challenge the statutory tests for consent and weaken the competent authority's ability to determine the development's acceptability in policy terms.

The unprecedented scale of the proposed development, with large turbines situated close to the coastline, raises urgent concerns about landscape capacity, visual impact, and environmental repercussions. The combination of insufficient information, reliance on undefined mitigation measures, evidential shortcomings, and clear policy violations indicates that the application is incomplete and incapable of sustaining a lawful decision. In light of these issues, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a complete, transparent, or dependable analysis of the potential environmental

consequences of the proposal. The adoption of a flexible Project Design Envelope, lacking firm commitments to specific turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This ambiguity undermines the assessment's integrity and means that the impacts outlined may not accurately reflect the actual development, hindering both public understanding and the competent authority's ability to gauge the true environmental effects.

Furthermore, the application is heavily dependent on mitigation measures, monitoring strategies, and management plans that have yet to be established. Seeking consent on the premise that environmental harm will be rectified at a future date obstructs any meaningful evaluation of effectiveness or assessment of residual impacts. This postponement of critical information to post-consent stages is procedurally improper and contradicts the intentions of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation must be clearly defined prior to any decision-making.

Significant evidential shortcomings are present, including gaps in baseline data, methodological limitations, and reliance on assumptions in lieu of site-specific evidence. This leads to uncertainty concerning the magnitude and significance of impacts, especially where negligible or non-significant effects are asserted without robust supporting data. A lack of sufficient information hampers a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory obligations.

Consequently, the application does not meet the evidential threshold necessary under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate alignment with National Planning Framework 4, including provisions regarding biodiversity protection and environmental integrity, as it is unclear whether impacts have been comprehensively assessed or if adequate safeguards are in place.

Overall, the reliance on an undefined design envelope, the absence of defined mitigation strategies, and the shortcomings in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These issues obstruct a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make a determination based on the information submitted.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives presented in the application is fundamentally inadequate and fails to meet the statutory obligations set forth by the Environmental Impact Assessment regime. Instead of offering a systematic and reasoned evaluation of realistic alternatives based on environmental impacts, the application provides a narrative detailing the evolution of the project. This method does not establish that less harmful options have been adequately identified, evaluated, and preferred over more damaging alternatives.

There is a clear lack of transparent, evidence-based comparisons concerning offshore locations, development scales, and design configurations. Notably, the application does not show that the developer has seriously considered the potential for placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be mitigated. The sensitivity of the West Lewis coastline and the crucial role of proximity to shore in determining the extent of impact make the absence of such analysis significant. This void prevents any conclusion that the proposed siting is indeed the least damaging option available.

The issues extend to the evaluation of cable routing and landfall assessments, as there is insufficient evidence indicating that alternative routes have been adequately considered to avoid or lessen impacts on sensitive receptors. This includes locations of cultural and spiritual significance, such as Barvas Cemetery. The lack of a clear strategy to avoid such impacts, combined with the absence of comparative analysis, suggests that mitigation by design has not been adequately applied, resulting instead in a reliance on post-design measures to address potential harm.

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

From a policy standpoint, this shortcoming compromises adherence to National Planning Framework 4, especially regarding the protection of natural environments, cultural heritage, and community well-being. The lack of a structured and comparative assessment is a significant omission that contributes to the overall determination that the application has not undergone adequate evaluation and cannot support a lawful decision.

MARINE ECOLOGY AND PROTECTED SPECIES

The West Lewis coastal environment is a highly sensitive and biologically active marine system. However, the assessment of marine ecology and protected species is materially deficient, failing to provide a complete and reliable understanding of ecological receptors. The baseline data is incomplete, and the methodologies used do not adequately capture species presence, behaviour, and habitat use. Consequently, there is no sound evidential basis for evaluating potential impacts.

One significant oversight pertains to otters, a European Protected Species. The application neglects to properly recognise and assess their active use of coastal areas for foraging and movement. This lack of consideration for their core foraging range and behavioural patterns means that the potential effects of construction disturbance, noise, and increased activity have not been sufficiently evaluated. Such omissions

undermine any claims regarding the absence of significant effects on otters.

Similarly, the assessment of basking sharks suffers from significant deficiencies. The reliance on aerial surveys introduces considerable detection bias, particularly in Atlantic conditions, which is likely to lead to an underestimation of their presence. This contrasts sharply with established land-based observations indicating frequent use of these waters. The failure to incorporate or adequately consider such data contributes to an incomplete baseline and diminishes the reliability of the conclusions presented.

These methodological shortcomings mean that conclusions regarding negligible or non-significant effects are based on assumptions rather than robust evidence. The lack of sufficient baseline data also hampers any meaningful assessment of cumulative and indirect impacts, including seasonal variation and wider ecosystem interactions. This creates uncertainty about the true scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not meet the requirements of the Environmental Impact Assessment regime or the National Planning Framework 4, as protected species have not been properly identified or assessed. The uncertainty introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt, 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 hinder a robust evaluation of impacts on marine ecology and protected species, leading to the overall conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment presented is fundamentally flawed, containing significant gaps in evidence and internal contradictions that undermine its conclusions. It has been identified that the west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application fails to adequately demonstrate that these species will not be adversely affected. The development is situated within crucial foraging areas and migratory routes, yet the assessment does not thoroughly evaluate the risks associated with displacement, collision, or habitat loss.

A major inconsistency arises within the application itself, as the developer asserts 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 contradiction raises doubts about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the available evidence. The assessment does not sufficiently confirm that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The critical nature of these feeding grounds is not adequately considered, and the dependence on modelling approaches introduces a level of uncertainty, particularly concerning species facing

severe decline like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly when baseline data is lacking and behavioural responses remain insufficiently understood.

The location of turbines within a recognised migratory corridor adds another significant risk, effectively posing a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application fails to adequately assess the long-term consequences of ongoing mortality within this corridor or the potential impact on species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential criteria necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with data deficiencies and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle, which obstructs a lawful conclusion in favour of consent. Furthermore, the identified deficiencies represent non-compliance with 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 unreliable due to internal inconsistencies, methodological flaws, and a lack of sufficient evidence. These issues hinder a thorough evaluation of impacts and collectively contribute to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

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

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

these vital factors.

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The evaluation of health, wellbeing, and social impacts associated with the development is fundamentally flawed and lacks the necessary transparency for a lawful appraisal. Although the developer commissioned a Social Impact Assessment, which included engagement with local residents, the complete report remains unpublished. This creates a significant evidential gap, hindering both public understanding and the competent authority's ability to assess the full range of social risks highlighted in the developer's research.

Summaries available suggest that residents are currently facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposed project. These impacts stem from direct interactions and are therefore based on actual experiences, rather than assumptions. However, the absence of the full assessment limits the scrutiny of these findings and restricts the capacity to evaluate their significance in the decision-making process.

Furthermore, there is substantial evidence indicating that the proposal is seen as a direct threat to community identity and cohesion, with findings from the developer highlighting "cultural loss." Despite this acknowledgment, the impacts have not been adequately incorporated into the primary application or assigned appropriate

importance. The failure to disclose the entire Social Impact Assessment clouds the true human and social costs associated with the development.

This lack of transparency further compromises the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health implications is vital for projects of this magnitude, especially when community dynamics may be influenced. By withholding the complete dataset, the application does not offer a comprehensive evidential foundation for weighing the benefits against potential harm.

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

The procedural ramifications are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a significant omission within the application and a failure to meet the evidential standards set by the Environmental Impact Assessment framework.

In summary, the failure to disclose the full Social Impact Assessment, alongside evidence of existing negative impacts, results in an incomplete and unreliable evaluation. This deficiency precludes a lawful determination and reinforces the assertion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual, landscape, and seascape impacts is significantly flawed and does not sufficiently capture the extent of change or the sensitivity of the surrounding environment. The West Lewis coastline is characterised by its open Atlantic views, undeveloped nature, and strong remoteness. The proposed large-scale turbines, which would be located near the shoreline, would introduce a continuous and overwhelming industrial presence that would fundamentally change this character, leading to a permanent and irreversible alteration of the landscape.

The application does not fully represent the scale of this visual change. Given their size and proximity, the turbines would dominate the views from residential areas, historic sites, and popular coastal spots. This dominance would adversely affect visual amenity and diminish the qualities of naturalness and remoteness that define the area. The assessment does not accurately convey the significance of this impact within such a sensitive landscape.

There are also serious methodological issues regarding the chosen visual viewpoints. Evidence suggests that these viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and valued landscapes. This raises concerns that the true extent of the

visual impact has been minimised, thereby compromising the assessment's reliability.

Additionally, there is a failure to consider the interconnectedness of landscape, seascape, and cultural heritage. Significant sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape that is visually and spatially linked to the Atlantic horizon. The assessment treats these assets as isolated, neglecting their interrelatedness, which results in an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, changing how heritage assets are perceived and severing their connection to the natural horizon. This represents not just a visual impact, but also a wider cultural and spatial detriment that has not been sufficiently evaluated in the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4 regarding the safeguarding of natural areas and historic assets. The extent of change is incompatible with the need to protect landscape character, visual amenity, and the setting of culturally significant locations. The lack of a robust worst-case assessment further undermines any assertion of policy adherence.

Moreover, it is evident that the identified impacts cannot be effectively mitigated. Due to the height, scale, and closeness of the turbines, their presence would be both dominant and inescapable. The resulting changes are thus fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation.

In summary, the assessment does not accurately represent the magnitude of impact, the sensitivity of the environment, or the interconnected relationship between landscape and heritage. These shortcomings hinder a reliable evaluation and support the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal involves significant works for seabed preparation and installation within a high-energy Atlantic environment. However, the assessment of construction and pollution risks is incomplete and lacks the necessary detail to evaluate likely environmental effects. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included with the application. Instead, it relies on mitigation and contingency measures that are to be prepared after consent, which prevents any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures raises particular concern given the sensitivity of the receiving environment. The coastline of West Lewis supports clean coastal waters and important habitats that are vulnerable to disturbance and contamination from sediment. Although the application acknowledges risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it fails to

provide sufficient details on how these risks will be prevented, controlled, or monitored.

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

The absence of detailed emergency response procedures further exacerbates these concerns. By postponing contingency planning to a post-consent stage, the application prevents the evaluation of whether appropriate safeguards are in place to respond to 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 viewpoint, the deferral of critical environmental safeguards is in conflict with the requirements of the Environmental Impact Assessment regime. Significant effects and necessary mitigation must be assessed prior to consent, and without this information, a lawful determination cannot be reached. The application also fails to demonstrate compliance with policy requirements regarding environmental protection and water quality.

Overall, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty concerning potential impacts collectively render the assessment materially deficient. These shortcomings obstruct a robust evaluation of construction and pollution risks and support the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents serious deficiencies in its assessment of fisheries and marine life, which fails to adequately evaluate ecological or socio-economic impacts. The waters off the West Lewis coast are home to both a diverse marine ecosystem and a thriving fishing industry. However, the proposal does not demonstrate that these essential uses and habitats can be preserved without causing significant disruption.

A critical flaw in the application is the assumption that displacing fishing activities will not have consequences. There is a lack of evidence regarding the availability or accessibility of alternative fishing grounds that could support the additional pressure. This gap in the assessment is significant, as it poses the risk of overfishing in other areas and may lead to broader economic ramifications for the local fishing fleet. Without a thorough and evidence-based analysis, the potential impacts on fisheries and the livelihoods of those who depend on them remain unclear.

The proposal introduces notable risks to marine species, particularly due to the

underwater noise generated during construction. The prolonged high-energy hammer piling is expected to disturb marine life over large distances, with particular concern for species like dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises serious alarms, yet the application downplays these effects without providing adequate supporting evidence.

Moreover, the application contains an internal inconsistency, as it acknowledges the need for licenses to allow harm to European Protected Species while simultaneously describing the impacts as negligible. This contradiction diminishes the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

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

From a policy standpoint, the application falls short of demonstrating compliance with National Planning Framework 4 and the National Marine Plan. It does not establish that the development can coexist with existing marine users or prevent unacceptable impacts on marine biodiversity, thereby failing to confirm that the proposal represents sustainable development.

In summary, the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies render the assessment both incomplete and unreliable. These shortcomings inhibit a robust evaluation of the implications for marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal's assessment of onshore infrastructure is fundamentally inadequate and neglects the full range of impacts from what constitutes a single integrated project. The offshore turbines and the onshore elements are inherently connected, yet they are evaluated separately, which leads to a fragmented understanding that obscures the true magnitude of the environmental and socio-economic repercussions.

Included in the onshore aspects are cabling that traverses protected moorland, the construction of a substation near Stornoway, and related access infrastructure that crosses sensitive landscapes. These activities necessitate excavation in areas of deep peat, particularly in Barvas Moor, a critical carbon store and ecologically important habitat. The application fails to deliver a thorough assessment of these impacts, which hinders a complete understanding of the project's overall environmental footprint.

The exclusion or postponement of the assessment of onshore impacts restricts a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered in unison; however, the

bifurcation of offshore and onshore elements results in an incomplete picture regarding the combined effects on peatlands, habitats, and local communities.

There are also serious risks posed to sensitive habitats, such as machair systems and peatland environments, which are afforded policy protection. The application does not establish that the impacts on these habitats have been comprehensively assessed or that appropriate measures for avoidance have been implemented. This creates a significant evidential gap concerning biodiversity protection.

The proposal brings forth additional concerns related to carbon balance. Disturbing peatland can release stored carbon, potentially resulting in a carbon debt that undermines the goals of renewable energy development. The application does not sufficiently address this issue or prove that the overall carbon balance remains beneficial.

Moreover, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application does not furnish evidence that the requisite consents or processes have been initiated, which raises significant doubts about deliverability and lawful implementation.

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 lack of evidence to show that impacts can be avoided or mitigated further diminishes 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 segment of the application incomplete and unreliable, thereby obstructing a lawful determination.

TOURISM

The evaluation of the proposed development's impacts on tourism is significantly lacking, as it neglects to analyse the economic and social effects on a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the area's natural features, including its wild coastline, nearly untouched landscapes, dark skies, and a sense of remoteness. While the application acknowledges that 86% of visitors are attracted by the scenery, it does not provide any quantified assessment of how the introduction of large-scale offshore infrastructure could influence visitor numbers, behaviour, or overall economic contribution to the island.

Tourism has seen considerable growth, rising 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 local economy. However, the application fails to model how the industrialisation of the seascape and the consequent decline in environmental quality might affect the Tourism Gross Value Added and the broader economic resilience. In the absence of this analysis, it remains unclear whether the proposed development would yield a net

economic benefit or potentially harm an established and expanding sector.

Additionally, the assessment overlooks the significance of environmental quality in sustaining tourism, particularly the role of unspoiled landscapes and dark skies in shaping visitor experiences, as well as the potential of emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a notable gap in the understanding of impacts on a recognised and growing segment of the local economy.

Within the context of an island community that has limited economic diversity, the failure to evaluate tourism impacts 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 properly assessed, which is required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, especially concerning economic impact and the necessity of showing net benefit. Furthermore, it contradicts strategic objectives that highlight tourism as a priority growth sector and fails to provide adequate evidence for the competent authority to evaluate the economic repercussions of the proposal.

In summary, the lack of a thorough quantification of tourism impacts, failure to address environmental drivers of visitor behaviour, and disregard for the island's economic dependence culminate in a considerable evidential gap. This gap hinders a comprehensive assessment of economic effects, reinforcing the conclusion that the application remains incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development when evaluated against statutory obligations, national policy, and evidential standards. It echoes the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the degree of industrialisation was deemed unacceptable. Notably, this new application is presented within a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing more strongly than before.

A thorough evidential basis for the determination of the application is lacking, with significant gaps in baseline data. The use of an undefined design envelope, reliance on unspecified mitigation measures, and the omission of critical impact pathways—such as those affecting nocturnal wildlife, onshore infrastructure, and tourism—further contribute to an incomplete Environmental Impact Assessment. Consequently, this incompleteness hinders a full understanding of likely significant effects and residual impacts.

Moreover, procedural failures are apparent in this application. The lack of a compliant Island Communities Impact Assessment constitutes a violation of statutory duty under

the Islands (Scotland) Act 2018, and the failure to disclose a complete Social Impact Assessment is a material omission. These shortcomings impede the competent authority's ability to assess the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

Furthermore, the proposal conflicts with National Planning Framework 4 as it does not demonstrate adequate protection of biodiversity, natural places, and cultural heritage. It fails to establish that health and wellbeing impacts are acceptable, and it cannot provide 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 properly evaluated, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent within themselves. The necessary evidential threshold required to dismiss adverse effects beyond reasonable scientific doubt has not been achieved. This situation engages the precautionary principle, precluding a lawful conclusion that the impacts are acceptable.

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

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

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

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: 78005E40

Member of the public 1109

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection is grounded in an analysis of the Environmental Impact Assessment Report and accompanying documentation, revealing significant deficiencies in material planning, environmental considerations, cultural aspects, and procedural adherence. The proposal 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 arise from the scale, proximity, and design of the proposal regarding its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis necessary for a lawful decision. There is a critical absence of environmental data, with baseline information that is both limited and inconsistent, and several key facets of the proposal remain undefined. The employment of a flexible design framework obscures a clear assessment of potential significant effects, while reliance on unspecified mitigation measures precludes any evaluation of their effectiveness. Consequently, the documentation fails to provide a comprehensive or informed understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidential support.

Moreover, there are clear and substantial conflicts with existing policies. The proposal seems at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural habitats, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. Such conflicts directly impact the statutory tests necessary for consent and compromise the capacity of the competent authority to determine the development's acceptability in policy terms.

The unprecedented scale of the proposal introduces significant concerns regarding landscape capacity, visual dominance, and environmental impact due to the positioning of large turbines in close proximity to the shoreline. Collectively, the lack of adequate information, reliance on undefined mitigation measures, evidential weaknesses, and clear non-compliance with policy reveal that the application is incomplete and unable to support a lawful determination. In light of these issues, the precautionary principle should be invoked.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment related to marine ecology and protected species within the West Lewis coastal environment is severely lacking. This area is a biologically active and sensitive marine system, yet the baseline data presented is insufficient, and the methodologies used do not adequately capture the presence, behaviour, and habitat use of various species. Consequently, the assessment fails to provide a reliable evidential basis for evaluating potential impacts.

Notably, there is a significant omission regarding otters, classified as a European Protected Species. The application does not properly recognise their active use of coastal areas for foraging and movement. This oversight, which neglects their core foraging range and behavioural patterns, means that the possible effects of construction disturbance, noise, and increased activity have not been sufficiently assessed. This gap undermines the conclusions drawn about the absence of significant effects on this species.

There are further shortcomings in the evaluation of basking sharks, where reliance on aerial surveys introduces substantial detection bias, particularly in the Atlantic conditions. This method is likely to underestimate their presence, especially when compared to established land-based observations that indicate frequent use of these waters. The failure to incorporate or adequately consider such data results in an incomplete baseline and diminishes the reliability of the conclusions reached.

The methodological limitations identified suggest that the conclusions of negligible or non-significant effects are based on assumptions rather than solid evidence. The lack of comprehensive baseline data also hampers the ability to meaningfully assess cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This introduces uncertainty regarding the actual scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set out in the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to identify or assess protected species adequately. The uncertainty generated hinders the possibility of excluding adverse effects beyond reasonable scientific doubt, thus necessitating the application of 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 obstruct a thorough evaluation of impacts on marine ecology and protected species, leading to the overall conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, lacking the necessary evidence and containing numerous internal inconsistencies that undermine its findings. The west coast of the Isle of Lewis is home to internationally important

seabird populations, many of which are already facing decline. However, the application fails to adequately demonstrate that these species will not be adversely affected. The proposed development is situated within critical foraging areas and migratory routes, yet the assessment does not thoroughly evaluate the risks associated with displacement, collision, or habitat loss.

There is a significant contradiction within the application itself. The developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises serious questions about the validity of the assessment, suggesting that the conclusions drawn are not supported by adequate evidence.

Moreover, the assessment lacks sufficient evidence to ensure that seabirds linked to protected areas, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is inadequately addressed, and the reliance on modelling introduces uncertainty, especially concerning species that are in severe decline, like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly where baseline data is insufficient and behavioural responses are not well understood.

The placement of turbines within a recognised migratory corridor further exacerbates the risk by effectively obstructing a primary flight path used by species migrating between the United Kingdom and Iceland. The application fails to sufficiently assess the long-term consequences of ongoing mortality within this corridor or the potential impacts on species with relatively small global populations.

Regulatory compliance is also in question, as the application does not meet the evidential standards required 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 and undermines a lawful conclusion in support of consent.

In summary, the identified deficiencies reflect a lack of adherence to National Planning Framework 4 concerning biodiversity protection and the preservation of natural assets. The failure to demonstrate that internationally important seabird populations will not be adversely affected places the proposal at odds with national policy. Collectively, these issues render the assessment unreliable, due to methodological weaknesses and insufficient evidence, ultimately leading 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 surrounding the West Lewis coastline is profoundly lacking. This area is a living cultural landscape, where the connections between environment, tradition, language, and community are deeply

intertwined. The application reduces heritage to mere static assets, neglecting their dynamic social, cultural, and spiritual roles within the community.

Significant shortcomings are evident in the treatment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for burial and spiritual practices, yet the assessment describes them as static features, overlooking their ongoing significance and the effects of development on their surroundings. This misrepresentation leads to an inadequate evaluation of cultural impacts and ignores their relevance to community life.

Moreover, the assessment fails to account for intangible cultural heritage, including the Gaelic language, local traditions, and the enduring relationship between the community and its coastal environment. These elements are vital to the area's identity, yet they are completely omitted from the assessment, which represents a major shortfall. Without addressing these aspects, the real cultural impact of the development remains obscured.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity and is recognised as an Indigenous People, but there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement compromises the assessment's legitimacy and does not adhere to established participation principles regarding decisions that affect cultural and environmental interests.

A fundamental procedural flaw is the failure to conduct a compliant Island Communities Impact Assessment, a requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot legally assess the social, cultural, and economic implications for the island community. This omission alone renders a lawful determination impossible.

From a policy standpoint, these gaps contradict the National Planning Framework 4, particularly concerning the safeguarding of historic assets and sites. The neglect to consider both tangible and intangible heritage, as well as to acknowledge living cultural practices, represents a clear deviation from policy requirements.

In summary, the lack of assessment regarding living heritage, intangible cultural values, community rights, and statutory obligations culminates in a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application does not offer a solid foundation for understanding the true cultural costs associated with the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual, landscape, and seascape impacts presented in the application is significantly lacking and does not accurately reflect the extent of change or the sensitivity of the surrounding environment. The West Lewis coastline is characterised by its unspoilt Atlantic horizon and a profound sense of remoteness. The

placement of large-scale turbines near the shoreline would create a persistent and overwhelming industrial presence, fundamentally changing this character and leading to a permanent transformation of the landscape that cannot be undone.

Furthermore, the application fails to adequately demonstrate the magnitude of visual change that would result. The scale and close proximity of the turbines would overshadow views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and diminishing the naturalness and remoteness that define the area. The assessment does not convincingly convey the significance of this impact within the context of such a delicate landscape.

Methodological issues also arise concerning the choice and presentation of visual viewpoints. Evidence indicates that the selected viewpoints may not sufficiently represent the most sensitive receptors or the worst-case scenarios, particularly concerning important cultural heritage sites and landscapes of high value. This raises concerns about the potential understatement of visual impact, which compromises the overall reliability of the assessment.

Additionally, there is a notable failure to evaluate the interconnected relationship between the landscape, seascape, and cultural heritage. Notable 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. Instead of recognising their interdependence, the assessment treats these sites as isolated, leading to an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these connections, altering how heritage assets are experienced and severing their link to the natural horizon. This not only represents a visual impact but also inflicts a wider cultural and spatial harm that has not been sufficiently addressed in the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4 regarding the preservation of natural environments and historic assets. The scale of the proposed changes is incompatible with the obligation to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further undermines any assertion of compliance with policy guidelines.

It is evident that the identified impacts cannot be effectively mitigated. Given the size, height, and proximity of the turbines, their presence would be unavoidable and dominating. As a result, the change is fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation measures.

Collectively, these shortcomings in the assessment prevent an accurate representation of the impact scale, the environment's sensitivity, and the interconnectedness of landscape and heritage. Such deficiencies hinder a reliable evaluation and support the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline is known for its clean coastal waters and significant habitats, both of which are susceptible to disturbance and contamination. The proposal for substantial seabed preparation and installation works within this high-energy Atlantic environment raises serious concerns, particularly as the assessment of construction and pollution risks is incomplete. The application lacks fully developed Construction Environmental Management Plans and Pollution Prevention Plans, relying instead on undefined mitigation and contingency measures that would be formulated after consent has been granted. This approach hinders any meaningful evaluation of their adequacy or effectiveness.

There is a troubling reliance on future measures that are not yet defined, especially given the sensitivity of the receiving environment. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate details on prevention, control, or monitoring strategies. Additionally, there is uncertainty surrounding the scale and behaviour of sediment plumes that may result 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, leaving potential effects on marine species and habitats inadequately addressed.

The absence of detailed emergency response procedures exacerbates these issues. Deferring contingency planning to a post-consent stage obstructs the assessment of whether sufficient safeguards are in place to handle pollution events. This not only introduces procedural risk but also compromises the ability of the competent authority to evaluate environmental protection measures at the point of determination.

From a regulatory standpoint, the lack of critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. The assessment of likely significant effects and necessary mitigation must occur prior to granting consent, and the absence of such information renders a lawful determination unachievable. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the deficiencies in defined mitigation measures, detailed management plans, and clarity regarding potential impacts contribute to a materially deficient assessment. These shortcomings further underscore the conclusion that the application is incomplete and cannot be appropriately evaluated for construction and pollution risks.

FISHERIES AND MARINE LIFE

The assessment pertaining to fisheries and marine life is inadequate, failing to deliver a thorough evaluation of both ecological and socio-economic impacts. The waters surrounding the West Lewis coast are home to a varied marine ecosystem and a functioning fishing industry. However, the application does not convincingly demonstrate how these habitats and activities can be preserved or sustained without

considerable disruption.

A key concern is the presumption that fishing operations can be relocated without adverse effects. The application lacks evidence to suggest that there are alternative fishing areas that are both available and suitable for accommodating additional fishing activity. This is a crucial oversight, as the displacement of fishing efforts could lead to overfishing in other regions and may have broader economic ramifications for the local fishing fleet. Without a robust, evidence-based assessment, the implications for fisheries and livelihoods remain unclear.

Additionally, the proposal poses significant risks to marine species, particularly due to the underwater noise produced during construction. The use of high-energy hammer piling for prolonged periods is expected to cause disturbances over considerable distances, impacting species such as dolphins. The anticipated disturbance to a notable portion of the local bottlenose dolphin population raises serious issues, yet the application minimizes these effects without adequate supporting evidence.

There is also a troubling inconsistency within the application, which acknowledges the necessity for licences to permit harm to European Protected Species, while simultaneously characterising the impacts as negligible. This contradiction diminishes the reliability of the assessment and raises questions about adherence to the Habitats Regulations, particularly in instances where anticipated harm necessitates legal authorisation.

Moreover, the assessment neglects to address cumulative impacts resulting from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. The absence of a thorough evaluation of these combined effects hampers the ability 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 provide evidence that the development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, thus precluding any assertion that the proposal constitutes sustainable development.

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

TOURISM

The application proposes large-scale offshore infrastructure that could significantly impact tourism on the Isle of Lewis. Tourism is a vital part of the local economy, with its growth from £65 million in 2017 to over £81.5 million today. This sector supports more than 1,000 jobs and accounts for up to 16% of the island’s economy. However, the

assessment fails to evaluate how this industrialisation may affect visitor numbers, behaviour, or the overall economic contribution of tourism, even though 86% of visitors come for the scenery.

The application does not consider the essential role of environmental quality in tourism. Unspoiled landscapes and dark skies enhance the visitor experience, and the absence of a Dark Skies Assessment leaves a significant gap regarding impacts on nature-based tourism and astro-tourism, which are growing markets. Without analysis of how industrialisation may affect Tourism Gross Value Added or economic resilience, it is unclear if the development would provide a net economic benefit or harm an important sector.

In an island community with limited economic diversification, neglecting the impacts on tourism raises concerns for employment, local businesses, and overall community sustainability. The lack of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been properly evaluated in line with the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not comply with National Planning Framework 4, particularly regarding economic impact and the demonstration of net benefit. It conflicts with strategic objectives that prioritise tourism growth and lacks sufficient evidence for the competent authority to assess the economic consequences of the proposal. Collectively, the failure to quantify tourism impacts and assess environmental factors results in a significant evidential gap, making it impossible to conduct a thorough evaluation of the economic effects and concluding that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm fails to meet the statutory requirements for sustainable development as outlined in national policy and evidential standards. This proposal is reminiscent of the 2008 Lewis Wind Power application, which was rejected due to unacceptable levels of industrialisation. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the current application does not address the critical issues raised in the previous refusal.

Significant gaps exist in the evidential basis for decision-making. The reliance on an undefined design envelope, unspecified mitigation measures, and the omission of vital impact pathways such as nocturnal wildlife, onshore infrastructure, and tourism effects render the Environmental Impact Assessment incomplete. As a result, the assessment fails to provide a comprehensive understanding of likely significant effects or residual impacts.

Procedural deficiencies are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, and the incomplete disclosure of the Social Impact Assessment constitutes a

material omission. These inadequacies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unsuitable for determination.

The proposal contradicts the National Planning Framework 4, as it does not demonstrate adequate protection for biodiversity, natural places, and cultural heritage. Furthermore, it fails to confirm that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The failure to properly assess the cumulative impacts of offshore and onshore components obscures potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks related to marine ecology, seabirds, protected species, and marine mammals remain unclear and potentially significant. The assessments provided do not meet the evidential threshold required to exclude adverse effects beyond reasonable scientific doubt, which engages the precautionary principle and prevents a lawful determination that impacts are acceptable.

Moreover, the proposal is likely to cause substantial and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, loss of dark skies, disruption of cultural and visual relationships, and negative impacts on tourism represent permanent changes that cannot be mitigated adequately.

In light of these substantive and procedural deficiencies, the application is unfit for determination. The combination of information gaps, policy conflicts, and unresolved environmental risks precludes a lawful, evidence-based decision. The competent authority must refuse consent based on these grounds or invoke the relevant regulatory provisions to require the submission of the missing information.

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

Additional Comments

To whom it may concern,

I am writing to formally object to the proposed N4 “Spiorad na Mara” offshore wind development off the west coast of the Isle of Lewis.

This proposal is not a modest renewable energy project. It is the industrialisation of one of the most culturally and environmentally significant landscapes in Scotland. Up to 60 turbines, each reportedly reaching heights of 338 metres above sea level and placed as close as 6km from shore, would permanently dominate the skyline and fundamentally alter the character of the west side of Lewis.

The west coast of Lewis is not an empty industrial zone waiting for exploitation. It is a living cultural landscape shaped by generations of Gaels, crofters, fishermen, families,

and communities whose connection to the land and sea forms part of our dualchas and identity. Once this scale of development is imposed, the damage cannot simply be undone.

I am deeply concerned by the cumulative environmental impact of this proposal and the wider pattern of large-scale energy developments across Lewis. The Scottish Government's own Strategic Environmental Assessment acknowledged the potential for "significant effects" including visual impacts, navigational safety concerns, and noise impacts. Yet despite this, island communities are being expected to absorb increasingly severe industrial development with inadequate consultation and limited local consent.

The proposal also raises serious questions about who truly benefits. According to publicly available information, the development is backed by multinational corporations Northland Power and ESB, while the electricity generated will largely be exported south via major transmission infrastructure crossing the island. Islanders are expected to accept the visual destruction of our coastline, substations, transmission corridors through sensitive peatlands, and long-term disruption, while the primary financial rewards leave the islands.

The impact on peatlands is particularly alarming. Lewis contains internationally important peatland habitats which are themselves crucial carbon stores. Disturbance and infrastructure development across these landscapes risks undermining the very climate goals being used to justify the project in the first place.

Tourism, recreation, fishing, and the natural identity of the island also stand to suffer. Highlands and Islands Enterprise itself acknowledged the potential negative impacts on commercial fisheries, shipping, tourism, aquaculture, and recreation. The west coast of Lewis is globally recognised for its wildness, beauty, archaeology, biodiversity, and sense of remoteness. Industrialising that coastline threatens something that cannot be recreated once lost.

There is also a profound democratic issue here. Many islanders feel these projects are being pushed forward without meaningful community consent. Communities are repeatedly told these developments are necessary, while concerns about landscape destruction, cultural erosion, ecological damage, and quality of life are minimised or dismissed. That is not genuine consultation.

Renewable energy must not become an excuse for sacrificing fragile rural and island communities to corporate-scale industrial expansion. Supporting renewable energy does not require accepting every proposal regardless of scale, location, or consequence. There is a clear difference between responsible, community-led renewable development and the transformation of Lewis into an energy extraction zone for external interests.

Lewis is not merely a resource to be consumed. It is a homeland, a cultural landscape, and an irreplaceable environment.

For all of these reasons, I strongly object to the N4 “Spiorad na Mara” wind farm proposal and urge decision-makers to reject this development.

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: ECC8A087

Member of the public 1110

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under marine licensing and Environmental Impact Assessment regulations. The objection arises from a review of the Environmental Impact Assessment Report and its supporting documents, highlighting significant planning, environmental, cultural, and procedural shortcomings. The proposed development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns regarding the scale, proximity, and design of the proposal suggest it may not comply with statutory requirements, national policy, or sustainable development principles.

The application lacks a sufficient evidential basis for a lawful determination. It is notable that critical environmental data is absent, baseline information is inconsistent and limited, and essential elements of the proposal remain unspecified. The employment of a flexible design framework obscures a clear understanding of potential significant effects, while the reliance on unspecified mitigation measures makes it impossible to evaluate their effectiveness. Consequently, the documentation does not provide a comprehensive understanding of the environmental, cultural, or community impacts, and claims regarding negligible or non-significant effects lack robust evidence.

There are also significant policy conflicts. The proposal seems to contradict the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not prove that it can meet national mandates to protect biodiversity, climate interests, and environmental integrity. These conflicts challenge the statutory tests required for consent and hinder the competent authority's capacity to determine the proposal’s acceptability in policy terms.

The unprecedented scale of the proposal, with large turbines positioned near the shoreline, raises serious concerns about landscape capacity, visual dominance, and environmental impact. In light of the lack of adequate information, the dependence on undefined mitigation, evidential weaknesses, and clear non-compliance with policy, it is evident that the application is incomplete and cannot support a lawful determination. Therefore, the precautionary principle must apply in these circumstances.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The absence of the full Social Impact Assessment fundamentally undermines the evaluation of social impacts, health, and wellbeing related to this proposal. The

developer has commissioned a Social Impact Assessment that included local residents in focus groups; however, the complete report remains unpublished. This significant evidential gap prevents both the public and the competent authority from fully understanding the social risks identified in the developer's own research.

Summaries that are available reveal that residents are currently facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts arise from direct engagement with the community and are therefore not speculative. The lack of transparency regarding the full assessment restricts proper scrutiny of the findings and hinders the ability to assess their importance in the decision-making process.

Furthermore, the proposal is viewed as a direct threat to community identity and cohesion, with findings from the developer indicating a risk of "cultural loss." Despite this recognition, such impacts have not been adequately integrated into the main application or given the necessary attention. The failure to disclose the complete Social Impact Assessment thus obscures the true human and social costs associated with the development.

The implications for the Environmental Impact Assessment process are substantial. A comprehensive understanding of the social, economic, and health impacts is crucial for developments of this scale, especially where community character and functioning may be jeopardised. The application, by withholding this vital information, lacks a complete evidential basis to appropriately evaluate the balance between benefits and detriments.

From a policy standpoint, the application fails to show compliance with National Planning Framework 4 regarding health and wellbeing. Development must foster positive health outcomes and prevent harm; however, the evidence available suggests the existence of adverse effects that have not been fully revealed. Without access to the complete assessment, compliance with this policy cannot be substantiated.

The procedural ramifications of this situation are significant. The competent authority is unable to perform a thorough socio-economic and health evaluation in the absence of the full Social Impact Assessment. This represents a critical omission within the application and a failure to satisfy the evidential requirements set by the Environmental Impact Assessment regime.

In summary, the combination of non-disclosure of the complete Social Impact Assessment and the evidence of existing adverse impacts leads to an incomplete and unreliable assessment. This situation hinders a lawful determination and reinforces the argument that the application does not rest on sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is significantly inadequate and does not reflect the true scale of change or the sensitivity of the environment. The

coastline of West Lewis is characterised by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. The proposed large-scale turbines positioned near the shoreline would introduce a continuous and dominant industrial presence, fundamentally transforming this character and resulting in a permanent and irreversible alteration of the landscape.

The application fails to represent the full extent of this visual change. The turbines' scale and proximity would dominate views from residential areas, historic sites, and frequently visited coastal locations, thereby directly impacting visual amenity and diminishing the defining qualities of naturalness and remoteness. Furthermore, the assessment does not adequately convey the significance of this level of impact in the context of such a sensitive landscape.

Concerns arise regarding the methodology used in selecting and presenting visual viewpoints. There is evidence to suggest that these viewpoints may not accurately represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and valued landscapes. This raises the risk of understating the magnitude of visual impact and questions the reliability of the assessment.

Moreover, the assessment neglects to evaluate the interconnectedness of landscape, seascape, and cultural heritage. Notable sites, such as the Calanais Standing Stones and other Scheduled Monuments, exist within a wider landscape setting, interconnected by visual and spatial relationships to the Atlantic horizon. Treating these as isolated assets fails to acknowledge their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The potential 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 situation not only presents a visual impact but also signifies broader cultural and spatial harm that the application has not adequately assessed.

From a policy standpoint, the proposal directly conflicts with the National Planning Framework 4 concerning the protection of natural environments and historic assets. The extent of change proposed is at odds with the obligation to protect landscape character, visual amenity, and the settings of culturally significant sites. The absence of a thorough worst-case assessment further challenges any assertion of compliance with policy.

Ultimately, the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be both dominant and unavoidable. Thus, the resulting change is fundamental and permanent, rather than capable of being reduced to an acceptable level through any means of mitigation.

In conclusion, the assessment is deficient in accurately portraying the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and

heritage. These shortcomings prevent a trustworthy evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application fails to provide a complete assessment of the onshore infrastructure, neglecting to consider the full range of impacts associated with what constitutes a single integrated project. The offshore turbines and onshore works are interdependent; however, the separate evaluations lead to a fragmented understanding that obscures the true scale of environmental and socio-economic effects.

Key components of the onshore development include cabling that crosses protected moorland, the construction of a substation located near Stornoway, and the necessary access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, especially within Barvas Moor, an ecologically sensitive habitat and significant carbon store. The lack of a comprehensive assessment of these impacts inhibits a complete understanding of the project's overall environmental footprint.

By deferring or omitting the assessment of onshore impacts, the application fails to allow for a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project be considered collectively; thus, the disjointed assessments of offshore and onshore elements prevent a full understanding of the combined impacts on peatlands, habitats, and local communities.

Moreover, there are substantial risks to sensitive habitats, such as machair systems and peatland environments, which are recognised for their policy protection. The application does not adequately demonstrate that the impacts on these critical habitats have been thoroughly assessed or that effective avoidance measures are in place, resulting in a significant evidential gap concerning biodiversity protection.

The proposal additionally raises serious concerns about carbon balance. Disturbance of peatland can release stored carbon, potentially resulting in a carbon debt that undermines the objectives of renewable energy development. The application does not sufficiently address this critical issue or provide evidence that the overall carbon balance remains favourable.

Furthermore, routing the infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application lacks evidence indicating that the required consents or processes have been initiated, raising doubts about the feasibility and legality of implementation.

From a policy standpoint, the project's fragmented assessment and the failure to safeguard peatlands, habitats, and land use interests are at odds with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be effectively avoided or mitigated further weakens the application.

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

TOURISM

The evaluation of tourism impacts presented in the application is notably inadequate, omitting critical insights into 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. Although it is acknowledged that 86% of visitors are attracted by the scenery, the application fails to provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of tourism.

This sector has experienced considerable growth, with tourism revenue increasing from £65 million in 2017 to over £81.5 million and sustaining more than 1,000 jobs, which represents up to 16% of the island's economy. However, the application neglects to model the potential effects of seascape industrialisation and loss of environmental quality on Tourism Gross Value Added and broader economic resilience. Such an oversight prevents the determination of whether the development would yield a net economic benefit or jeopardise an established and expanding sector.

Furthermore, the assessment does not adequately address the significance of environmental quality for tourism, particularly regarding how unspoiled landscapes and dark skies enhance visitor experiences and foster emerging markets like nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this shortcoming, resulting in a considerable gap in understanding impacts on an acknowledged and growing component of the local economy.

In an island community with limited economic diversity, the failure to evaluate tourism impacts has broader implications for employment, local businesses, and community sustainability. The lack of a compliant Island Communities Impact Assessment means that these economic vulnerabilities remain unevaluated, as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, especially regarding economic impact and the necessity to show net benefits. It also runs counter to strategic objectives that prioritise tourism as a growth sector, and insufficient evidence is presented for the competent authority to assess the economic consequences of the proposal.

Overall, the shortcomings in quantifying tourism impacts, evaluating the environmental factors that drive visitor behaviour, and recognising the economic dependencies of the island culminate in a significant evidential gap. This gap undermines a robust assessment of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed, 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 thre.
from what i have read, a wind farm of this type should be built **further** offshore.
why is it being planned for this location?
thanks.

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: 61BDB631

Member of the public 1111

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 is fundamentally inadequate, failing to deliver a comprehensive, transparent, and dependable evaluation of the environmental repercussions associated with the proposal. The introduction of a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty. This uncertainty obstructs the consistent application of a worst-case scenario, thereby compromising the assessment's integrity. As a result, the environmental impacts detailed may not accurately reflect the eventual development, leaving both the public and the competent authority unable to grasp the true magnitude of environmental effects.

Furthermore, the application places considerable reliance on mitigation measures, monitoring strategies, and management plans that have yet to be clearly defined. Seeking consent based on the premise that any environmental harm will be addressed at a later stage is unacceptable. This approach undermines the meaningful evaluation of effectiveness and the assessment of residual impacts. Deferring crucial information to post-consent stages conflicts with the objectives of the Environmental Impact Assessment regime, which stipulates that likely significant effects and mitigation strategies must be clearly established prior to decision-making.

There are significant evidential shortcomings present, including gaps in baseline data, limitations within the methodology, and an overreliance on assumptions rather than site-specific evidence. These issues result in uncertainty concerning the scale and significance of impacts, especially where the report presents conclusions of negligible or non-significant effects without adequate supporting data. The lack of sufficient information hinders a clear understanding of cumulative and worst-case impacts, fostering scientific uncertainty that cannot align with statutory requirements.

Consequently, the application fails to meet the evidential threshold mandated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This raises the precautionary principle, particularly concerning protected species and sensitive habitats. The proposal also does not demonstrate adherence to National Planning Framework 4, specifically regarding biodiversity protection and environmental integrity, as it cannot confirm 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 specified mitigation measures, and significant gaps in baseline data renders the Environmental Impact Assessment Report untrustworthy and incomplete. These deficiencies prevent a lawful and thorough evaluation of environmental effects, leaving the competent authority unable to make a determination based on the information presented.

ASSESSMENT OF ALTERNATIVES

The proposed application lacks a robust assessment of alternatives, failing to meet the necessary statutory requirements of the Environmental Impact Assessment regime. Instead of providing a structured and reasoned comparison of realistic alternatives

based on their environmental effects, the application offers a narrative that recounts the project's evolution. This approach does not adequately demonstrate that less harmful options have been properly identified, assessed, and chosen over more damaging solutions.

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is inadequate, providing an incomplete understanding of the ecological receptors in the West Lewis coastal environment. This marine system is both sensitive and biologically active, yet the baseline data is lacking, and the methodologies used do not effectively capture the presence, behaviour, and habitat use of species. Consequently, the assessment lacks a solid evidential foundation for evaluating potential impacts.

One significant oversight is the treatment of otters, a European Protected Species. The application does not sufficiently acknowledge their active use of coastal areas for

foraging and movement. The failure to consider their core foraging range and behavioural patterns leads to an inadequate assessment of the potential effects from construction disturbance, noise, and increased activity. This gap undermines any claims regarding the lack of significant effects on this species.

The assessment also reveals shortcomings in evaluating basking sharks, with heavy reliance on aerial surveys that introduce considerable detection bias, particularly under Atlantic conditions. This method likely underrepresents their presence when compared to established land-based observations, which show frequent use of these waters. Not incorporating or accurately considering such data results in an incomplete baseline, reducing the reliability of the conclusions drawn.

These methodological flaws mean that any conclusions suggesting negligible or non-significant effects are based on assumptions rather than solid evidence. Additionally, insufficient baseline data hampers meaningful assessments of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty about the actual risks to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime or the National Planning Framework 4. Protected species have not been properly identified or assessed, and the level of uncertainty undermines the ability to exclude adverse effects beyond reasonable scientific doubt, thereby engaging the precautionary principle. Under these conditions, granting consent would not be lawful.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents an ornithological assessment that is fundamentally flawed, characterised by significant evidence gaps and internal contradictions that compromise its findings. The west coast of the Isle of Lewis is home to seabird populations of international importance, many of which are already in decline. However, the application fails to meet the necessary evidential standards to demonstrate that these species will not experience adverse effects. The development is situated within crucial foraging areas and migratory routes, yet the assessment does not sufficiently examine the potential consequences of displacement, collision risk, or habitat loss.

Moreover, there exists a fundamental contradiction within the application, where the developer concludes that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is typically warranted only when significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment, suggesting that the conclusions drawn lack support

from the evidence provided. The assessment is inadequate in demonstrating that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will not be affected. The significance of these feeding grounds is not comprehensively addressed, and the reliance on modelling methodologies introduces uncertainty, particularly for severely declining species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, especially given the incomplete baseline data and the lack of understanding of behavioural responses.

The proposed siting of turbines within a recognised migratory corridor introduces an additional significant risk, effectively creating a barrier along a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not adequately evaluate the long-term implications of sustained mortality within this corridor or consider the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential threshold required to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside gaps in data and limitations of the modelling, indicates that the standard of beyond reasonable scientific doubt has not been attained. This invokes the precautionary principle and hinders a lawful conclusion in support of the proposal.

Furthermore, the identified deficiencies constitute a failure to adhere to the National Planning Framework 4 in terms of biodiversity protection and the preservation of natural assets. The inability to establish that internationally important seabird populations will not be adversely impacted positions the proposal in direct opposition to national policy.

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The failure to publish the complete Social Impact Assessment significantly undermines the ability to properly evaluate the social impacts, health, and wellbeing associated with the proposed development. Although the developer engaged local residents through focus groups and commissioned a Social Impact Assessment, the lack of transparency regarding the full report creates an evidential gap that hinders public understanding and the competent authority’s ability to assess the social risks highlighted in the developer's research.

Available summaries reveal that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement rather than speculation, yet without access to the full assessment, proper scrutiny of the findings is unattainable. This limitation restricts the

ability to ascertain the significance of these impacts in the decision-making process.

Moreover, there is clear evidence indicating that the proposal threatens community identity and cohesion, with references to “cultural loss” found within the developer’s own documentation. However, these findings have not been adequately integrated into the main application or given the weight they deserve. By withholding the complete Social Impact Assessment, the developer obscures the true human and social cost of the proposed development.

The lack of transparency also jeopardises the Environmental Impact Assessment process. Understanding the full range of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning are at stake. The absence of the complete dataset means that the application does not provide a comprehensive evidential basis necessary for weighing benefits against harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Development proposals must foster positive health outcomes and mitigate harm, yet the evidence at hand suggests existing negative effects that remain undisclosed. Without the full assessment, it is impossible to establish compliance with this policy framework.

The procedural ramifications are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation in the absence of the full Social Impact Assessment. This represents a critical omission in the application and fails to satisfy the evidential criteria set forth by the Environmental Impact Assessment regime.

In conclusion, the non-disclosure of the complete Social Impact Assessment, coupled with the evidence of existing adverse impacts, renders the evaluation incomplete and unreliable. This situation prevents a lawful determination and reinforces the assertion that the application is not underpinned by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual, landscape, and seascape impacts is significantly lacking and does not adequately capture the degree of change or the sensitivity of the environment. The coastline of West Lewis is characterised by its open Atlantic horizon, its undeveloped nature, and a strong sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the shore would create a continuous industrial presence, fundamentally altering this character and leading to a permanent transformation of the landscape.

The application fails to represent the extent of the visual change. Given their scale and closeness, the turbines would dominate the views from residential areas, historic sites, and popular coastal locations. This would have a direct impact on visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does

not convey the level of this impact or its significance within the context of such a sensitive landscape.

There are also concerns regarding the methodology used for selecting and presenting visual viewpoints. Evidence indicates that the viewpoints may not fully reflect the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and valued landscapes. This raises the possibility that the visual impact may have been understated, undermining the assessment's reliability.

Additionally, the assessment does not consider the interconnected relationships between landscape, seascape, and cultural heritage. Significant sites, including the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape connected through visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as isolated, rather than acknowledging their interdependence, which leads to an incomplete evaluation of the impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are perceived and severing their connection to the natural horizon. This represents not just a visual impact but also a more extensive cultural and spatial harm that has not been sufficiently evaluated within the application.

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4 regarding the safeguarding of natural places and historic assets. The extent of change is inconsistent with the requirement to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further undermines any claim of compliance with policy.

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

In summary, the assessment does not accurately reflect the scale of impact, the sensitivity of the environment, or the interconnected nature of the landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The incomplete assessment of construction and pollution risks does not provide adequate detail for evaluating likely environmental effects. This proposal entails significant seabed preparation and installation activities in a high-energy Atlantic environment, yet it lacks fully developed Construction Environmental Management Plans and Pollution Prevention Plans. Instead, the application relies on future

mitigation and contingency measures that will be prepared after consent, which obstructs any meaningful assessment of their sufficiency or effectiveness.

This reliance on unspecified future measures is particularly alarming due to 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. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it does not offer sufficient details on prevention, control, or monitoring measures.

There exists uncertainty regarding 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 ramifications of these impacts. This uncertainty also pertains to potential effects on marine species and habitats identified as sensitive within the broader assessment.

The lack of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning to a post-consent phase, the application inhibits the assessment of whether suitable safeguards are established to address pollution incidents. This situation introduces procedural risk and diminishes the ability of the competent authority to evaluate environmental protection measures during the determination process.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. Significant effects and necessary mitigation must be evaluated before granting consent; the absence of such information precludes a lawful determination. The application also fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, inadequate management plans, and uncertainty about potential impacts result in a materially deficient assessment. These deficiencies hinder a thorough evaluation of construction and pollution risks and further corroborate 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 assessment of onshore infrastructure is not only incomplete but fails to capture the full extent of impacts from what constitutes a single integrated project. The offshore turbines are connected to the onshore works, yet these elements are assessed separately. This fragmented approach obscures the true scale of environmental and socio-economic effects.

Onshore components include cabling across protected moorland, the construction of a

substation near Stornoway, and related access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, especially within Barvas Moor, an ecologically sensitive habitat and significant carbon store. The lack of a comprehensive assessment in the application means that the overall environmental footprint of the project is not fully understood.

By excluding or deferring 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 must be considered collectively. However, the separation of offshore and onshore elements 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 under policy. The application fails to demonstrate that impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been put in place. This gap raises significant concerns regarding biodiversity protection.

The proposal also brings forth issues related to carbon balance. Disturbing peatland can release stored carbon, potentially leading to a carbon debt that contradicts the goals of renewable energy development. The application does not adequately address this concern or show that the overall carbon balance is beneficial.

Moreover, routing infrastructure through active croft land poses potential conflicts with existing land use and legal rights. There is insufficient evidence in the application indicating that necessary consents or processes have been initiated, casting doubt on the project's deliverability and lawful implementation.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding dark skies and nocturnal wildlife is a critical shortfall within the Environmental Impact Assessment. The West Lewis coastline boasts particularly dark skies, which play a vital role in the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting will result in a continuous and intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

There has been no evaluation of the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This is a significant oversight considering the essential nature of dark skies to the identity of the region and the burgeoning sectors of tourism, such as astro-tourism. Consequently, the absence of these assessments creates a clear void in the overall evaluation of landscape and environmental impacts.

Furthermore, the impacts on nocturnal wildlife remain unexamined. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can lead to disorientation and increased risks of collision. The application does not feature any lighting impact assessment or phototaxis study, failing to evaluate how aviation lighting may impact these species or elevate mortality rates.

The reliance on daytime survey data within the ornithological assessment exacerbates this issue, as it does not capture the nocturnal activity or the associated risks that species such as Kittiwakes face while foraging or migrating at night. The absence of site-specific night-time data creates a significant gap in understanding ecological impacts.

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

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

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

TOURISM

The application inadequately addresses the economic and social impacts of tourism, which is a vital component of the Isle of Lewis economy. The local tourism sector is heavily reliant on the area's wild coastline, pristine landscapes, dark skies, and sense of remoteness. While it is noted that 86% of visitors are attracted by the scenery, the application lacks a quantitative assessment of how the introduction of large-scale offshore infrastructure might influence visitor numbers, behaviours, and the overall economic contribution of tourism.

Tourism has experienced considerable growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and making up to 16% of the island's economy. However, the failure to model the potential impact of seascape industrialisation and the loss of environmental quality on Tourism Gross Value Added and overall economic resilience is concerning. Without this analysis, it remains unclear if the proposed development would yield a net economic benefit or hinder an established and expanding sector.

Furthermore, the assessment overlooks the significance of environmental quality for tourism, particularly the role of unspoiled landscapes and dark skies in shaping visitor experiences and fostering emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, creating a substantial gap in understanding the impacts on an already recognised and developing sector of the local economy.

In an island community characterised by limited economic diversification, the inadequate evaluation of tourism impacts raises serious concerns regarding employment, local businesses, and community sustainability. The omission of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been examined as required 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 necessity to demonstrate net benefit. It conflicts with strategic objectives that prioritise tourism as a growth sector and fails to provide adequate evidence for the competent authority to assess the economic implications of the proposal.

Overall, the combination of insufficient quantification of tourism impacts, neglect of the environmental factors influencing visitor behaviour, and disregard for the island's economic dependency leads to a critical evidential shortcoming. This deficiency 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 fails to meet the requirements for sustainable development as outlined in statutory duties, national policy, and evidential standards. It raises the same fundamental issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This application is now presented within a more stringent policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

The evidential basis for decision-making is neither complete nor reliable. There are significant gaps in baseline data, the design envelope remains undefined, and it relies on unspecified mitigation measures. Furthermore, key impact pathways have been omitted, including those affecting nocturnal wildlife, full onshore infrastructure, and

tourism. Consequently, the Environmental Impact Assessment lacks the completeness needed to fully understand the likely significant effects or any residual impacts.

There are also serious procedural shortcomings. The failure to provide a compliant Island Communities Impact Assessment breaches statutory requirements under the Islands (Scotland) Act 2018. Additionally, the non-disclosure of a complete Social Impact Assessment is a material omission. These issues 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 direct conflict with National Planning Framework 4, the proposal does not adequately protect biodiversity, natural places, and cultural heritage. It fails to demonstrate that the health and wellbeing impacts are acceptable and does not provide evidence of a net economic benefit, as there is no tourism impact modelling included. The cumulative effects of both offshore and onshore elements have not been properly assessed, masking potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal are uncertain and potentially significant. Assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been achieved. This engages the precautionary principle and prevents a lawful conclusion regarding the acceptability of impacts.

The proposed project would lead to substantial and irreversible changes to a highly sensitive landscape. It would industrialise the Atlantic-facing coastline, result in a loss of dark skies, disrupt cultural and visual relationships, and negatively impact tourism, leading to permanent effects that cannot be adequately mitigated.

Overall, the application is both procedurally and substantively unfit for determination. The substantial information deficiencies, coupled with conflicts with policy and unresolved environmental risks, obstruct a lawful and evidence-based decision. The competent authority should either refuse consent on these grounds or utilise the necessary regulatory provisions to demand the submission of the missing information.

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

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: 659F2EC5

Member of the public 1112

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 development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, nearly untouched environment, and robust cultural identity. The scale and design of this proposal, along with its proximity to the shoreline, give rise to significant concerns regarding its compatibility with statutory requirements and national policy, particularly in relation to sustainable development principles.

A thorough review of the Environmental Impact Assessment Report and accompanying documentation reveals material deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. There is a notable absence of critical environmental data, with baseline information being both limited and inconsistent. Key elements of the proposal remain undefined, and the use of a flexible design framework obscures a clear understanding of potential significant effects. Furthermore, the reliance on unspecified mitigation measures means that their effectiveness cannot be properly evaluated. Consequently, the documentation falls short of providing a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible effects lack robust supporting evidence.

Policy conflicts are evident and substantive. The proposal appears at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural spaces, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These policy discrepancies directly impact the statutory tests necessary for consent and challenge the ability of the competent authority to conclude that the development aligns with policy standards.

The unprecedented scale of the proposal, involving large turbines in close proximity to the shoreline, raises significant concerns about landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation, evidential shortcomings, and clear policy non-compliance indicates that the application is incomplete and unable to support a lawful determination. In light of these issues, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed, lacking a full, transparent, and reliable account of the potential environmental impacts of the proposed development. The introduction of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates significant uncertainty. This ambiguity compromises the integrity of the assessment and means that the impacts outlined may not accurately reflect those of the actual development, thus preventing both the public and the competent authority from grasping the true extent of environmental effects.

Furthermore, the application is heavily dependent on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Consent is sought on the basis that any environmental harm will be addressed later, which obstructs a meaningful evaluation of effectiveness or assessment of residual impacts. This postponement of vital information to post-consent stages is procedurally unacceptable and undermines the objectives of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be clearly established before determination.

There are also considerable evidential shortcomings, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. Such deficiencies create uncertainty regarding the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are made without adequate supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainties that cannot satisfy 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, particularly concerning protected species and sensitive habitats. Moreover, the proposal does not demonstrate compliance with National Planning Framework 4, including stipulations regarding biodiversity protection and environmental integrity, as it is not possible to show that impacts have been thoroughly assessed or that appropriate safeguards are in place.

In conclusion, the reliance on an undefined design envelope, the absence of specified mitigation, and the existence of gaps in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings hinder a lawful and rigorous assessment of environmental effects, leaving the competent authority unable to make an informed determination based on the information available.

ASSESSMENT OF ALTERNATIVES

The application significantly falls short in its assessment of alternatives, failing to meet the statutory requirements set forth by the Environmental Impact Assessment regime. Instead of offering a structured and reasoned evaluation of viable alternatives concerning their environmental effects, it merely presents a narrative of the project's

evolution. This inadequacy prevents the identification, assessment, and selection of less harmful options in favour of more damaging solutions.

Moreover, there is a lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, and design configurations. Notably, the developer has not convincingly explored the possibility of positioning turbines further offshore, which could potentially alleviate visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline, along with the critical importance of proximity to the shore in evaluating impacts, further emphasises the necessity of such analysis. The absence of this examination undermines any assertion that the proposed siting constitutes the least damaging option.

In addition, the issues extend to the assessment of cable routing and landfall, where insufficient evidence indicates that alternative routes have been adequately explored to mitigate impacts on sensitive receptors, including significant cultural and spiritual sites like Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis suggests that the approach has not incorporated mitigation by design, relying instead on post-design measures.

As a consequence, the application does not adequately demonstrate that environmental harm has been minimised through effective site selection, layout, and infrastructure routing. This failure to adhere to the established mitigation hierarchy hampers the competent authority's ability to ascertain whether less harmful and more suitable alternatives exist. Without a comprehensive assessment of alternatives, it is impossible to determine that the proposal aligns with sustainable practices or complies with relevant policies.

From a policy standpoint, this deficiency severely undermines adherence to National Planning Framework 4, particularly concerning the protection of natural areas, cultural heritage, and community wellbeing. The absence of a systematic and comparative assessment is a significant omission that ultimately leads to the conclusion that the application has not undergone sufficient scrutiny and cannot support a lawful decision.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species associated with the application is fundamentally inadequate, failing to deliver a comprehensive and trustworthy understanding of the ecological receptors within the West Lewis coastal environment. This region constitutes a highly sensitive and biologically rich marine system; however, the baseline data presented is insufficient, and the methodologies employed do not effectively capture the presence, behaviours, and habitat utilisation of various species. Consequently, the assessment lacks a solid evidential basis necessary for evaluating potential impacts.

A significant gap exists concerning otters, which are classified as a European Protected Species. The application does not adequately acknowledge or evaluate their active utilisation of coastal regions for foraging and movement. The disregard for their core

foraging range and behavioural patterns means that the potential impacts of construction-related disturbances, noise, and heightened activity remain inadequately assessed. This oversight seriously undermines any conclusions regarding the absence of significant effects on this species.

Further shortcomings are apparent in the assessment of basking sharks. The reliance on aerial surveys introduces considerable detection bias, particularly under Atlantic conditions. This methodological approach is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that indicate their frequent use of these waters. The failure to include or appropriately consider such vital data leads to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings result in conclusions of negligible or non-significant effects that are predicated 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 uncertainty casts doubt on the actual level of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not comply with the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been identified or assessed in a thorough manner. The introduced uncertainties prevent the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these issues, it is clear that consent cannot be granted lawfully.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species, culminating in the overarching conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment provided is fundamentally unreliable, characterised by significant internal inconsistencies, methodological weaknesses, and a lack of sufficient evidence. Notably, the application does not adequately demonstrate that the internationally important seabird populations on the west coast of the Isle of Lewis, many of which are already in decline, will not face adverse effects from the proposed development. Critical foraging areas and migratory pathways are situated within the development site, yet the assessment fails to thoroughly evaluate the risks associated with displacement, collision, and habitat loss.

Moreover, the application contains a striking contradiction, where the developer asserts that there are no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case. This derogation is only necessary when

significant harm is anticipated, thereby raising serious questions about the reliability of the assessment and suggesting that its conclusions lack the support of adequate evidence. The assessment does not sufficiently address the potential impacts on seabirds linked to protected sites such as the Lewis Peatlands and St Kilda. It inadequately accounts for the critical importance of these feeding grounds and relies on modelling techniques that introduce significant uncertainty, particularly for species facing severe decline, like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly in light of incomplete baseline data and insufficient understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor adds further risk, as it effectively creates a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term consequences of sustained mortality in this corridor have not been properly assessed, nor have the potential impacts on species with 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 combination of contradictory conclusions, data deficiencies, and limitations in modelling means that the required standard of beyond reasonable scientific doubt has not been attained. This situation engages the precautionary principle and precludes a lawful conclusion in favour of consent. Additionally, these identified deficiencies indicate non-compliance with the National Planning Framework 4, particularly regarding biodiversity protection and the safeguarding of natural assets. The failure to demonstrate that internationally important seabird populations will remain unaffected places the proposal in direct opposition to national policy.

In summary, the assessment's shortcomings undermine a robust evaluation of potential impacts and lead to the overall conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment conducted on the cultural heritage and community identity is significantly flawed, failing to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community intertwine. This application adopts a simplified view, treating heritage as a collection of isolated, static assets rather than acknowledging their ongoing social, cultural, and spiritual relevance within the community.

A notable shortcoming is evident in the handling of culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual engagement, yet the assessment categorises them merely as static features, overlooking their continued use, significance, and the potential impact of development on their surroundings. This misrepresentation leads to an inadequate understanding of cultural effects and dismisses their vital role in community life.

Moreover, the assessment neglects intangible cultural heritage, such as the Gaelic language, traditions, and the enduring bond between the community and the coastal environment. These aspects are crucial to the area's identity but are entirely omitted from the evaluation, representing a considerable gap. The cultural implications of the development cannot be fully grasped without considering these essential elements.

Concerns also arise regarding community rights and participation. The Gaelic-speaking population, recognised for its distinct cultural identity akin to that of Indigenous Peoples, has not been afforded a process of Free, Prior and Informed Consent. The lack of meaningful engagement calls into question the credibility of the assessment and fails to align with established principles for participation in decisions that influence cultural and environmental matters.

Additionally, there is a critical procedural oversight in the failure to complete a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. Without this assessment, the relevant authority cannot meet its legal obligation to assess the social, cultural, and economic effects on the island community. This absence alone renders a lawful determination impossible.

From a policy standpoint, these shortcomings place the proposal at odds with National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to acknowledge both tangible and intangible heritage, alongside a disregard for living cultural practices, signifies a clear deviation from policy expectations.

In summary, the collective neglect to evaluate living heritage, intangible cultural value, community rights, and statutory duties creates a substantial evidential gap. The cultural consequences of the development have not been adequately examined, leaving the application without a solid foundation for assessing the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the Social Impact Assessment fundamentally undermines the evaluation of social impacts, health, and wellbeing associated with the proposed development. Although the developer engaged local residents through focus groups, the full report has not been made available. This absence of information creates a significant evidential gap that restricts both public understanding and the competent authority's ability to fully assess the social risks identified in the developer's research.

Current summaries reveal that residents are experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts, gathered through direct engagement, are factual rather than speculative. However, the failure to disclose the complete assessment hinders appropriate scrutiny and limits the assessment of the significance of these impacts within the decision-making framework.

Moreover, there is evidence suggesting that the proposal threatens community identity and cohesion, with the developer's findings indicating a potential "cultural loss." Despite this, the application does not adequately incorporate these identified impacts or give them appropriate consideration. The withholding of the full Social Impact Assessment obscures the actual human and social costs of the development.

This lack of disclosure significantly compromises the Environmental Impact Assessment process. Understanding the social, economic, and health implications of developments of this magnitude is critical, especially when community character and functioning may be at stake. Without the complete dataset, the application falls short of providing a comprehensive evidential basis needed to weigh the benefits against the harms involved.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 concerning health and wellbeing. It is essential for development to promote positive health outcomes and to mitigate any harm. The available evidence points to existing adverse effects that have not been fully revealed, and without the full assessment, it is impossible to show compliance with this policy.

The procedural implications of this situation are noteworthy. The competent authority cannot carry out a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This omission constitutes a material shortcoming within the application and fails to satisfy the evidential criteria required by the Environmental Impact Assessment framework.

In conclusion, the combination of the non-disclosure of the complete Social Impact Assessment and the evidence of existing adverse impacts renders the assessment incomplete and untrustworthy. This situation hinders a lawful determination and highlights that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and a significant sense of remoteness. The proposal to introduce large-scale turbines in close proximity to the shoreline would lead to a continuous and dominant industrial presence, fundamentally transforming this character in a permanent and irreversible manner. The assessment fails to adequately represent the magnitude of the visual change that would occur. Given the scale and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations, thereby directly impacting visual amenity and eroding the defining qualities of naturalness and remoteness. The failure to convey the true extent of this impact within the context of such a sensitive landscape raises significant concerns.

Moreover, methodological issues are evident in the selection and presentation of visual viewpoints. It appears that the viewpoints chosen may not adequately represent the most sensitive receptors or worst-case scenarios, particularly with respect to key

cultural heritage sites and high-value landscapes. This suggests a risk that the actual magnitude of visual impact has been understated, which undermines the reliability of the assessment process.

Additionally, there is a critical deficiency in the assessment's treatment of the interconnected relationship between 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 by visual and spatial relationships to the Atlantic horizon. The evaluation treats these assets in isolation, disregarding their interdependence and leading to an incomplete assessment 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 perceived and severing their connection to the natural horizon. This represents not only a visual impact but also a broader cultural and spatial harm that has not been sufficiently examined within the application.

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4 regarding the protection of natural places and historic assets. The extent of change is incompatible with the necessity to safeguard 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 requirements.

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

In summary, the assessment does not accurately reflect the scale of impact, the sensitivity of the environment, or the interconnected nature of the landscape and heritage. These shortcomings hinder a reliable evaluation and confirm that the proposal is incompatible with the necessary protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks sufficient detail regarding the assessment of construction and pollution risks, making it impossible to properly evaluate the potential environmental effects. Significant seabed preparation and installation works are planned for a high-energy Atlantic environment; however, the absence of fully developed Construction Environmental Management Plans or Pollution Prevention Plans is alarming. Instead, the application depends on mitigation and contingency measures that would only be prepared after consent, obstructing any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures raises significant concerns due to the sensitivity of the receiving environment. The West Lewis coastline is home to clean

coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on how these risks will be prevented, controlled, or monitored.

There remains considerable 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 not feasible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also applies to potential effects on sensitive marine species and habitats identified in the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent is granted, the application undermines the ability to evaluate whether appropriate safeguards are in place for responding to pollution events. This introduces procedural risk and impairs the competent authority's ability to assess environmental protection measures during the determination process.

From a regulatory standpoint, the deferral of crucial environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant likely effects and mitigation must be evaluated prior to consent, and the absence of such information means that a lawful determination cannot occur. Furthermore, the application does not demonstrate compliance with policy requirements pertaining to environmental protection and water quality.

In summary, the combination of undefined mitigation measures, lack of detailed management plans, and uncertainty regarding potential impacts results in a materially deficient assessment. These failings hinder a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment pertaining to fisheries and marine life is inadequate, failing to deliver a thorough evaluation of both ecological and socio-economic impacts. The waters surrounding the West Lewis coast are home to a varied marine ecosystem and a functioning fishing industry. However, the application does not convincingly demonstrate how these habitats and activities can be preserved or sustained without considerable disruption.

A key concern is the presumption that fishing operations can be relocated without adverse effects. The application lacks evidence to suggest that there are alternative fishing areas that are both available and suitable for accommodating additional fishing activity. This is a crucial oversight, as the displacement of fishing efforts could lead to overfishing in other regions and may have broader economic ramifications for the local fishing fleet. Without a robust, evidence-based assessment, the implications for fisheries and livelihoods remain unclear.

Additionally, the proposal poses significant risks to marine species, particularly due to the underwater noise produced during construction. The use of high-energy hammer piling for prolonged periods is expected to cause disturbances over considerable distances, impacting species such as dolphins. The anticipated disturbance to a notable portion of the local bottlenose dolphin population raises serious issues, yet the application minimizes these effects without adequate supporting evidence.

There is also a troubling inconsistency within the application, which acknowledges the necessity for licences to permit harm to European Protected Species, while simultaneously characterising the impacts as negligible. This contradiction diminishes the reliability of the assessment and raises questions about adherence to the Habitats Regulations, particularly in instances where anticipated harm necessitates legal authorisation.

Moreover, the assessment neglects to address cumulative impacts resulting from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. The absence of a thorough evaluation of these combined effects hampers the ability 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 provide evidence that the development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, thus precluding any assertion that the proposal constitutes sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed project includes offshore turbines and various onshore works, which are part of a single integrated initiative. However, the assessment of these onshore infrastructure components is incomplete and does not account for the full impacts of the project. The offshore and onshore elements are intrinsically linked but are examined separately, leading to a fragmented understanding of the environmental and socio-economic effects.

Onshore works involve cabling across protected moorland and the construction of a substation near Stornoway, along with access infrastructure through sensitive landscapes. These activities require excavation in areas of deep peat, particularly within Barvas Moor, a significant carbon store and ecologically sensitive habitat. The application fails to provide a thorough assessment of these impacts, which obscures the project’s overall environmental footprint.

By not addressing or delaying the assessment of onshore impacts, the application hinders a proper evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all project components should be considered collectively. However, the separation of the offshore and onshore parts means that the combined impacts on peatlands, habitats, and communities remain poorly understood.

There are notable risks to sensitive habitats, including machair systems and peatland environments, which are protected by policy. The application does not adequately show that the impacts on these habitats have been fully evaluated or that appropriate avoidance measures have been put in place, creating a significant gap in biodiversity protection evidence.

Additionally, there are concerns about the carbon balance. Disturbing peatland releases stored carbon, potentially resulting in a carbon debt that contradicts the goals of renewable energy development. The application does not sufficiently address this concern or demonstrate that the overall carbon balance is favourable.

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 initiated, raising concerns about deliverability and legal compliance.

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

Overall, the separation of project elements, the lack of a comprehensive assessment, and insufficient evidence regarding environmental and land use impacts make this part of the application incomplete and unreliable, which impedes a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which play a crucial role in environmental quality, cultural identity, and tourism value. The introduction of permanent red aviation lighting, visible over long distances, threatens to create a continuous and intrusive “wall of light” effect across the western horizon, fundamentally altering the night-time environment. This significant change is not addressed in the application, which neglects to assess the impact 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 the burgeoning sector of astro-tourism, this omission raises serious concerns.

Moreover, there is a glaring absence of evaluation regarding the impacts on nocturnal wildlife. Species like the Manx Shearwater, European Storm Petrel, and Leach’s Storm

Petrel are particularly sensitive to artificial lighting due to phototaxis, which can cause disorientation and increase collision risks. Without any lighting impact assessment or phototaxis study, the application fails to evaluate how aviation lighting may affect these species or contribute to increased mortality.

The reliance on daytime survey data in the ornithological assessment further compounds this issue, as it does not take into account nocturnal activity or associated risks. Other species, such as Kittiwakes, which may forage or migrate at night, are also at risk of disorientation due to artificial lighting. Yet, this risk has not been evaluated. The lack of site-specific night-time data creates a critical gap in understanding the ecological impacts.

Without a thorough assessment of nocturnal impacts, it becomes impossible to ascertain whether protected species or designated sites would face adverse effects. The evidential standard required to exclude such adverse effects beyond reasonable scientific doubt cannot be met, thus invoking the precautionary principle and inhibiting a lawful determination.

From a policy standpoint, this omission is in conflict with National Planning Framework 4 regarding the protection of natural places and environmental quality. Furthermore, it undermines a comprehensive assessment of landscape and seascape impacts, as the character of night-time forms an integral part of the environment.

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

TOURISM

The assessment of tourism impacts is significantly lacking and does not evaluate the economic and social consequences for a crucial sector of the Isle of Lewis economy. Tourism is inherently reliant on the wild coastline, near-pristine landscape, dark skies, and sense of remoteness that the area offers. The application notes that 86% of visitors are attracted by scenery; however, it fails to provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism has seen substantial growth, increasing from £65 million in 2017 to over £81.5 million, and supports more than 1,000 jobs while accounting for up to 16% of the island's economy. Yet, the application does not model the potential effects of industrialising the seascape and the resulting loss of environmental quality on Tourism Gross Value Added or the broader economic resilience of the area. Without such analysis, it remains unclear whether the development would produce a net economic benefit or jeopardise an established and expanding sector.

Moreover, the assessment overlooks the crucial role of environmental quality in

tourism, specifically the significance of unspoiled landscapes and dark skies for visitor experience and emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortcoming, leaving a substantial gap in understanding the impacts on a recognised and growing part of the local economy.

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

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

Collectively, the failure to quantify tourism impacts, assess environmental factors that drive visitor behaviour, and consider the island's economic dependency leads to a significant evidential gap. This hampers a robust evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed and fails to meet the requirements of sustainable development as outlined by statutory duties, national policy, and evidential standards. It revisits the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This current proposal is presented under a supposedly stronger policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it falls short in these areas.

Crucial gaps exist in the baseline data provided, alongside the use of an undefined design envelope and unspecified mitigation measures. The omission of key impact pathways, particularly concerning nocturnal wildlife, full onshore infrastructure, and tourism, further undermines the application. The Environmental Impact Assessment is incomplete, failing to allow for a comprehensive understanding of significant effects or residual impacts.

Procedural shortcomings are evident in the absence of a compliant Island Communities Impact Assessment, breaching the statutory duty established under the Islands (Scotland) Act 2018. Furthermore, the lack of a full Social Impact Assessment represents a critical omission. These failings hinder the competent authority's ability to properly assess the implications for community wellbeing, cultural identity, and economic resilience, thereby rendering the application unsuitable for determination.

In addition, the proposal is in direct conflict with 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, nor can it provide evidence of a net economic benefit due to the lack of tourism impact modelling. The cumulative impacts from both offshore and onshore elements have not been adequately assessed, leaving concerns over effects on peatlands, carbon balance, habitats, and crofting land unaddressed.

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also contain inconsistencies. The evidential threshold necessary to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

The proposal also threatens to 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 impacts on tourism represent permanent changes that cannot be mitigated adequately.

In summary, the application is both procedurally and substantively unfit for determination. The multitude of information deficiencies, along with policy conflicts and unresolved environmental risks, obstruct any lawful, evidence-based decision. It is imperative that the competent authority refuse consent based on these grounds or invoke the necessary regulatory measures to mandate the submission of the missing information.

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

Additional Comments

Dear Sir/Madam,

I was born and raised in Bragar on the west side of Lewis, a proud Gaelic speaking islander. My family still live there and will be directly facing the proposed wind farm that will impact one of the most ecologically and culturally significant coastlines in Europe and OUR home.

It is evident that Comhairle nan Eilean Siar made decisions long before planning applications were submitted and before any effective community consultation had taken place. CnES made unsubstantiated claims to Marine Directorate that the community strongly supported offshore wind development of this scale at this location, a claim that was simply untrue and was accepted without question and included N4 in the Draft Plan Option. A recent survey showed that 88% of people on the west side of Lewis actually oppose this supposedly 'proposed' development.

I am not opposed to renewables but I am DEEPLY concerned that our own local council is willing to deceive and throw their community under the bus in this manner. The residents don't know what's happening because things are being dealt with so underhandedly and thereby the future of the island, and islanders, is being put at risk. We are being asked to accept this wind farm without knowing the full implication of underground cables across the Barvas moor or the implication on crofting land, peatland, machair, infrastructure, birdlife and migratory birds, fishing zones, microplastic shedding, community disturbances or the potential health hazards that could be caused by wind turbines being in such close proximity to land and homes. This will inevitably have an impact on those who wish to remain on the island and consequentially will have a hugely negative impact on the Gaelic language if we lose our natives. Again, we are not unaware of extractive practices, where brands/companies want Gaelic quick fixes for projects , 'Spiorad na Mara', so that they can say they have contributed or shown an interest in local culture whilst giving back the minimum, "let's be grateful to Spiorad na Mara for supporting our little Gaelic, children's project..." Hopefully there are more people than not that see the bigger picture at play here.

'Community owned' sounds attractive but really they are asking communities to accept industrialisation and destruction of their own homes, asking them to sell their souls in order to get limited financial recompense. There seems to be no mandate at community level for this offshore wind plan, it's up to communities to fight for maximum benefit!
There are widespread concerns in this community and this should have a carefully curated and valid public inquiry.

The Highlands & Islands are no strangers to outsiders pretending to do things for local benefit, it's time for this to stop. If this is SO beneficial a project for our local community, why not go back to your own shores and do it there?
This is the industrialisation of our island purely for corporate greed, regardless of community feeling or environmental impact. Greenwashing is not a new term or concept for many indigenous communities across the world but caring for, and protecting, every element of us and our land is something we all have the right to do.

Yours 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: 3059AF8F

Member of the public 1113

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. This objection arises from a thorough review of the Environmental Impact Assessment Report and supporting documentation, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural compliance. The development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns have been raised regarding the proposal's compatibility with statutory requirements, national policy, and the principles of sustainable development, particularly given its scale, proximity to the shoreline, and design.

The application lacks an adequate evidential basis for a lawful determination. There is a notable absence of critical environmental data, while baseline information is found to be limited and inconsistent. Furthermore, key aspects of the proposal remain undefined. The application employs a flexible design framework, which obscures a clear understanding of potential significant effects. Additionally, the reliance on unspecified mitigation measures renders their effectiveness impossible to assess. Consequently, the documentation fails to provide a comprehensive or informed understanding of the environmental, cultural, or community impacts, with assertions of negligible or non-significant effects lacking robust evidence.

The proposal presents clear and substantive conflicts with established policies. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests essential for consent and undermine the capability of the competent authority to determine the development's acceptability in policy terms.

The unprecedented scale of the proposal raises considerable concerns regarding landscape capacity, visual dominance, and overall environmental impact due to the large turbines' proximity to the shoreline. Collectively, the lack of sufficient information, dependence 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 issues, the precautionary principle must be applied.

PERSONAL IMPACT:

I am a disabled person who suffers from misophonia, pain and migraines triggered by extra/sub audible noise and pressure changes, and my pain levels and life will be unbearable with the constant pulsing of sub-audible bass frequency noise and pressure changes coming from these blades.

Nowhere on earth have blades so high been built or tested, nowhere on earth has a very fragile community been placed so close to untested and unwanted pollution and risks with ABSOLUTELY NO COMMUNITY BENEFIT whatsoever.

In Aird Uig, Isle of Lewis, we pay the highest electricity prices in the whole of Europe, and yet, we have to have our lives, livelihoods, culture and communities decimated and CONTINUE to PAY exorbitant fees whilst being USED as the BATTERY OF EUROPE??!! If it is safe, why are Northland not building this on Canadian coastline - there is plenty of space there. Because our community are being sacrificed for greed, and the backpayments from our OWN TAXES, whilst we continue to pay.

We are an intangible cultural asset, our minority language and way of life is at risk, our environment is at risk from this development, and still we have to pay for our own desecration.

I am all for genuinely renewable energy (I drafted some of the Green party's policy documents ten years ago) so I know without a doubt that this is greenwash and a landgrab. It is not sustainable. It is not democratic. It is barefaced greed, and it will come back to haunt every single person who enables this destructive act. Do not be on the wrong side of history.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is lacking in essential information and does not offer a complete, clear, or trustworthy account of the potential environmental impacts of the proposal. The proposal's use of a flexible Project Design Envelope, which lacks commitment to specific turbine sizes, layouts, or configurations, creates considerable uncertainty. This approach hinders a consistent worst-case scenario analysis, compromising the assessment's integrity and obscuring the true environmental effects from both the public and the competent authority.

The application heavily depends on mitigation measures, monitoring strategies, and management plans that remain undefined. Consequently, consent is sought under the premise that environmental damage will be addressed later, which hinders meaningful evaluation of effectiveness or the assessment of residual impacts. Deferring critical information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment process, which mandates that likely significant effects and mitigation strategies be clearly established before any determination.

There are notable evidential shortcomings, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This leads to uncertainty about the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are made without robust supporting evidence. The lack of sufficient information hampers a clear understanding of cumulative and worst-case impacts, contributing to scientific uncertainty that cannot be aligned with statutory obligations.

As a result, the application does not satisfy the evidential requirements under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This brings the precautionary principle into play, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate compliance with National Planning Framework 4, including requirements for biodiversity protection and environmental integrity, as it has not been shown that impacts have been fully assessed or that suitable safeguards are established.

Overall, the dependence on an undefined design envelope, the absence of specific mitigation measures, and gaps in baseline data lead to an unreliable and incomplete Environmental Impact Assessment Report. These shortcomings prevent a lawful and robust evaluation of environmental effects and leave the competent authority unable to make an informed decision based on the provided information.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives is critically insufficient and fails to satisfy the statutory requirements of the Environmental Impact Assessment regime. Instead of providing a structured and reasoned comparison of viable alternatives based on their environmental effects, the application offers a narrative account of the project's evolution. This method does not adequately demonstrate that less harmful options have been identified, assessed, and selected over more damaging solutions.

There is a clear lack of transparent and evidence-based comparisons of alternative offshore locations, development scales, or design configurations. Notably, the application does not show that the developer has genuinely considered placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be lessened. The sensitivity of the West Lewis coastline and the critical role of proximity to shore in determining impact highlight the importance of such an analysis; without it, one cannot conclude that the proposed siting is the least damaging option.

These deficiencies 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. This oversight includes areas of cultural and spiritual significance, such as Barvas Cemetery. The lack of a clear strategy for avoidance, alongside the absence of comparative analysis, suggests that mitigation by design has not been utilised, with an over-reliance on post-design measures instead.

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

From a policy standpoint, this shortcoming undermines adherence to National Planning Framework 4, especially regarding the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission that supports the overall conclusion that the application has not been adequately evaluated and cannot lawfully be determined.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment regarding marine ecology and protected species is fundamentally lacking, failing to deliver a complete and dependable understanding of ecological receptors within the West Lewis coastal environment. This area represents a highly sensitive and biologically active marine system; however, the baseline data provided is incomplete, and the methodologies employed do not sufficiently capture the presence, behaviour, and habitat use of species. Consequently, the assessment does not establish a solid evidential basis necessary for accurately evaluating impacts.

A significant oversight pertains to otters, which are recognised as a European Protected Species. The application inadequately acknowledges and evaluates their active use of coastal areas for foraging and movement. The omission of their core foraging range and behavioural patterns results in an inadequate assessment of potential impacts from construction disturbance, noise, and increased activity. This deficiency undermines any claims regarding the absence of significant effects on this species.

Further issues arise in the evaluation of basking sharks, where an overreliance on aerial surveys introduces considerable detection bias, especially under Atlantic conditions. This method is likely to underestimate their presence when compared to established land-based observations that indicate frequent usage of these waters. The failure to adequately incorporate or consider such data leads to an incomplete baseline and diminishes the reliability of the conclusions drawn.

Due to these methodological flaws, the claims of negligible or non-significant effects are rooted in assumptions rather than substantive evidence. Additionally, the lack of adequate baseline data hinders the meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty obscures the true extent of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set forth by the Environmental Impact Assessment regime and the National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainty generated means that it is impossible to exclude adverse effects beyond reasonable scientific

doubt, thereby invoking the precautionary principle. Under these conditions, it is not lawful to grant consent.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally important seabird populations that are already experiencing declines. However, the ornithological assessment related to the development application is materially flawed, containing significant evidence gaps and internal inconsistencies that undermine its conclusions. The application fails to adequately demonstrate that these species will not be adversely affected, despite being located within key foraging areas and migratory pathways. It does not robustly evaluate the implications of displacement, collision risk, or habitat loss.

A fundamental contradiction exists within the application itself; the developer asserts that there will be no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only necessary where significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment and indicates that the conclusions drawn are not substantiated by the evidence provided.

The assessment does not sufficiently demonstrate that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is not fully recognised, and the reliance on modelling approaches introduces further uncertainty, particularly for species that are in severe decline, like Kittiwakes and Fulmars. The methodologies used 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 recognised migratory corridor presents an additional and significant risk, effectively creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not adequately address the long-term implications of sustained mortality in this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application fails to meet the evidential threshold required to determine that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside gaps in data and limitations in modelling, means that the standard of beyond reasonable scientific doubt has not been satisfied. This invokes the precautionary principle and obstructs a lawful conclusion in support of consent.

The deficiencies noted also 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 puts the proposal in direct conflict with national policy.

Overall, these shortcomings render the assessment unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. Such failings prevent a thorough evaluation of potential impacts and lead to the conclusion that the application does not fulfil the statutory requirements necessary for a valid determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment related to cultural heritage and community identity is fundamentally lacking, failing to acknowledge the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community interweave. Instead, the application employs a simplified approach, treating heritage as isolated, static entities rather than recognising their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming is evident in the consideration of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active burial and spiritual sites; however, the assessment classifies them as mere static features. This oversight neglects their continued use and significance, as well as the impact that development would have on their setting. Consequently, this misrepresentation leads to an incomplete understanding of cultural effects and ignores their integral role in community life.

The assessment further overlooks intangible cultural heritage, which encompasses the Gaelic language, local traditions, and the long-established bond between the community and the coastal environment. These elements are vital to the identity of the region but are conspicuously missing from the evaluation, signifying a major gap in understanding the true cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking community embodies a distinct cultural identity, recognised as an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. The lack of meaningful engagement casts doubt on the legitimacy of the assessment and fails to adhere to established principles regarding participation in decisions that affect cultural and environmental interests.

Moreover, there is a critical procedural failure in the absence of a compliant Island Communities Impact Assessment, which is a legal requirement under the Islands (Scotland) Act 2018. This omission precludes the competent authority from meeting its legal obligations to evaluate the social, cultural, and economic impacts on the island community, thus impeding a lawful determination.

From a policy standpoint, these deficiencies place the proposal at odds with National Planning Framework 4, particularly concerning the preservation of historic assets and locations. The neglect of both tangible and intangible heritage, alongside the failure to recognise living cultural practices, signifies a clear deviation from policy expectations.

In summary, the neglect to assess living heritage, intangible cultural value, community rights, and statutory responsibilities creates a substantial evidential gap. The cultural impacts of the development remain inadequately examined, and the application fails to furnish a solid foundation for understanding the genuine cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal lacks a complete and transparent assessment of social impacts, health, and wellbeing, which is crucial for a lawful evaluation. Although the developer commissioned a Social Impact Assessment that included focus groups with local residents, the full report has not been made available. This creates a significant evidential gap, hindering the public and the competent authority from grasping the full extent of the social risks identified through the developer's own research.

Residents are reportedly facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal, as indicated by available summaries. These effects are based on direct engagement and are thus not speculative. Nonetheless, the failure to disclose the full assessment limits proper scrutiny of these findings and restricts the ability to evaluate their significance in the decision-making process.

Moreover, there is evidence suggesting that the proposal is viewed as a direct threat to community identity and cohesion, with the developer's own findings highlighting the risk of "cultural loss." Despite acknowledging these impacts, they have not been sufficiently integrated into the main application or given the necessary weight. The withholding of the full Social Impact Assessment conceals the genuine human and social costs associated with the development.

This lack of transparency undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is vital for developments of this magnitude, especially where community character and functioning may be compromised. By failing to provide the complete dataset, the application does not offer an adequate evidential foundation for assessing the balance between benefits and harms.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Developments must promote positive health outcomes and mitigate harm, yet the existing evidence reveals adverse effects that have not been fully disclosed. Without the complete assessment, compliance with this policy remains unproven.

The procedural ramifications are considerable. The competent authority cannot conduct a thorough socio-economic and health evaluation in the absence of the full Social Impact Assessment. This omission represents a material flaw in the application and indicates a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, along with evidence of existing adverse impacts, results in an incomplete and unreliable assessment. This obstructs a lawful determination and underscores that the application is not substantiated by adequate information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon and undeveloped nature, contributing to a profound sense of remoteness. The assessment of seascape, landscape, and visual impacts associated with the proposal is deficient and fails to adequately reflect the scale of change and the sensitivity of the environment. The introduction of large-scale turbines close to the shoreline would establish a continuous and dominant industrial presence, fundamentally transforming the character of the landscape in a permanent and irreversible manner.

The application does not sufficiently represent the extent of the visual change that would occur. Given the scale and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations, significantly impacting visual amenity and diminishing the qualities that define naturalness and remoteness. The current assessment does not accurately convey the level of impact or its significance in the context of such a sensitive landscape.

Methodological concerns arise regarding the selection and presentation of visual viewpoints. Evidence indicates that some viewpoints may fail to 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 has been underestimated, thus challenging the reliability of the assessment.

Moreover, the assessment neglects to consider the interconnected relationship between landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape setting linked to the Atlantic horizon through visual and spatial relationships. The treatment of these sites as isolated assets does not acknowledge their interdependence, resulting in an incomplete evaluation of the impacts on their setting and cultural significance.

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

application.

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

It is evident that the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would ensure their presence remains dominant and unavoidable. Consequently, the change would be fundamental and permanent, and not amenable to reduction to an acceptable level through mitigation efforts.

In summary, the assessment fails to accurately represent the magnitude of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings preclude a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal raises significant concerns due to the incomplete assessment of construction and pollution risks, which lacks the necessary detail to evaluate the potential environmental effects. The extensive seabed preparation and installation works within the high-energy Atlantic environment are not accompanied by fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that are to be devised after consent is granted, hindering any meaningful evaluation of their adequacy or effectiveness.

This reliance on unspecified future measures is particularly alarming, considering the delicate nature of the receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it falls short of providing adequate detail on how these risks will be prevented, controlled, or monitored.

Moreover, there is uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. The lack of robust modelling and clearly defined management strategies means that it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also extends to the potential effects on marine species and habitats, which have already been identified as sensitive in the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning to a post-consent phase, the application obstructs the assessment of whether suitable safeguards are in place to handle pollution incidents. This situation introduces procedural risks and diminishes

the competent authority's ability to evaluate environmental protection measures effectively at the point of determination.

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

Overall, the lack of defined mitigation measures, absence of detailed management plans, and uncertainty regarding potential impacts render the assessment materially deficient. These shortcomings impede a thorough evaluation of construction and pollution risks, reinforcing 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 thorough evaluation of both ecological and socio-economic impacts. It is critical to note that the waters off the West Lewis coast are home to a diverse marine ecosystem and a thriving fishing industry. However, the proposal does not adequately demonstrate that these vital habitats and economic activities can be safeguarded or sustained without facing severe disruption.

One major concern is the presumption that fishing activities can be shifted without any adverse effects. The application does not supply evidence that alternative fishing grounds exist, are accessible, or can accommodate the additional pressure from displaced activities. This gap is crucial, as such displacement could lead to overfishing in other areas, posing broader economic risks for the local fishing fleet. Without a comprehensive, evidence-based assessment, the consequences for fisheries and local livelihoods remain unclear.

Moreover, the proposal poses substantial risks to marine species, especially due to underwater noise generated during the construction process. The use of high-energy hammer piling for an extended period could cause disturbances over considerable distances, impacting species such as dolphins. There are significant concerns regarding the anticipated disturbance to a large proportion of the local bottlenose dolphin population, yet these potential impacts are significantly downplayed in the application, lacking adequate supporting evidence.

Additionally, there is a notable inconsistency within the application itself. While it acknowledges the need for licenses to permit harm to European Protected Species, it simultaneously characterises the impacts as negligible. This contradiction undermines the credibility of the assessment and raises serious questions about compliance with the Habitats Regulations, particularly in instances where harm is expected to a degree that necessitates legal authorisation.

The assessment also neglects to address cumulative impacts from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. A lack of a comprehensive evaluation of these combined effects means that the overall implications for marine ecosystems and socio-economic conditions remain indeterminate.

From a policy perspective, the application does not illustrate compliance with 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, thereby obstructing any conclusion that this proposal represents sustainable development.

In summary, the deficiencies related to the lack of evidence on fishing displacement, the underestimation of acoustic impacts, and internal inconsistencies render the assessment incomplete and untrustworthy. These shortcomings hinder a robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is not only incomplete but fails to capture the full extent of impacts from what constitutes a single integrated project. The offshore turbines are connected to the onshore works, yet these elements are assessed separately. This fragmented approach obscures the true scale of environmental and socio-economic effects.

Onshore components include cabling across protected moorland, the construction of a substation near Stornoway, and related access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, especially within Barvas Moor, an ecologically sensitive habitat and significant carbon store. The lack of a comprehensive assessment in the application means that the overall environmental footprint of the project is not fully understood.

By excluding or deferring 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 must be considered collectively. However, the separation of offshore and onshore elements 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 under policy. The application fails to demonstrate that impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been put in place. This gap raises significant concerns regarding biodiversity protection.

The proposal also brings forth issues related to carbon balance. Disturbing peatland can release stored carbon, potentially leading to a carbon debt that contradicts the

goals of renewable energy development. The application does not adequately address this concern or show that the overall carbon balance is beneficial.

Moreover, routing infrastructure through active croft land poses potential conflicts with existing land use and legal rights. There is insufficient evidence in the application indicating that necessary consents or processes have been initiated, casting doubt on the project's deliverability and lawful implementation.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposed application lacks a comprehensive assessment of dark skies and nocturnal wildlife, which is a significant oversight in the Environmental Impact Assessment. The West Lewis coastline is noted for its exceptionally dark skies, which contribute greatly to the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting visible over long distances would create an intrusive "wall of light" effect on the western horizon, fundamentally changing the night-time environment.

There is no analysis of how this lighting will affect visual amenity, landscape character, or the experiences of residents and visitors. This gap is particularly concerning given the crucial role dark skies play in the area's identity and the growth of tourism sectors such as astro-tourism. The failure to examine these impacts represents a clear deficiency in the overall assessment of the landscape and environment.

The application also neglects to evaluate the effects on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly vulnerable to artificial lighting due to their phototactic behaviour, which can cause disorientation and heighten collision risks. Without a lighting impact assessment or phototaxis study, the proposal fails to consider how aviation lighting could affect these species or increase mortality rates.

This shortcoming is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activity and related risks. Other species, such as Kittiwakes, may also forage or migrate at night and are susceptible to disorientation caused by artificial lighting. The lack of site-specific night-time data leads to a critical deficiency in understanding ecological impacts.

In the absence of an evaluation of nocturnal effects, it remains impossible to ascertain whether protected species or designated sites would suffer adverse impacts. 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 National Planning Framework 4 concerning the protection of natural places and environmental quality. It also diminishes the overall assessment of landscape and seascape impacts, as the character of night-time is an essential aspect of the environment.

Overall, the failure to assess dark skies and nocturnal wildlife results in a significant evidential gap. The absence of baseline data, impact modelling, and specific analysis of affected species leaves the application incomplete and unable to support a lawful determination.

TOURISM

The tourism assessment presented in this application is fundamentally inadequate, failing to consider the economic and social ramifications for a critical sector of the Isle of Lewis economy. With tourism heavily reliant on the area's wild coastline, pristine landscapes, dark skies, and a sense of remoteness, this oversight is alarming. Although the application indicates that 86% of visitors are attracted by the scenery, it lacks a detailed evaluation of how large-scale offshore infrastructure might impact visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism has seen remarkable growth, rising from £65 million in 2017 to more than £81.5 million, supporting over 1,000 jobs and representing up to 16% of the island's economy. However, the application does not take into account how the industrialisation of the seascape and the deterioration of environmental quality could affect Tourism Gross Value Added or the overall resilience of the economy. Without a thorough analysis, it remains unclear if the proposed development would provide a net economic benefit or harm this vital and expanding sector.

Furthermore, the assessment neglects the significance of environmental quality in bolstering tourism, particularly regarding unspoiled landscapes and dark skies, which are essential to enhancing visitor experiences. The lack of a Dark Skies Assessment exacerbates this shortcoming, leaving a critical gap in understanding the implications for an increasingly recognised and vital aspect of the local economy, such as nature-based and astro-tourism.

Given the limited economic diversification of the island community, the disregard for tourism impacts carries broader repercussions for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been sufficiently evaluated, contrary to requirements set forth in the Islands (Scotland) Act 2018.

From a policy standpoint, the application fails to demonstrate alignment with National Planning Framework 4, especially concerning economic impact and the need to prove a net benefit. It also stands in conflict with strategic goals that highlight tourism as a key growth sector and does not supply adequate evidence for the competent authority to assess the economic consequences of the proposal.

All these factors combined reveal a significant evidential gap due to the failure to quantify tourism impacts, assess environmental influences on visitor behaviour, and recognise the island's economic reliance on tourism. This lack of thorough evaluation hinders a comprehensive understanding of the economic effects and underscores that the application remains incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed in its ability to meet the standards of sustainable development as required by statutory duties and national policy. It mirrors the key issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it still fails to address these critical areas adequately.

A major concern is the lack of a complete and reliable evidential basis for the application. There are significant gaps in baseline data, an undefined design envelope is still in use, and there is a heavy reliance on unspecified mitigation measures. Additionally, key impact pathways, such as those affecting nocturnal wildlife, onshore infrastructure, and tourism, have not been adequately addressed. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of the likely significant effects or any residual impacts.

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

Furthermore, the proposal contradicts the National Planning Framework 4, lacking evidence for the protection of biodiversity, natural areas, and cultural heritage. It does not demonstrate that the impacts on health and wellbeing are acceptable, nor does it provide evidence of a net economic benefit due to the absence of tourism impact assessments. The cumulative impacts of both offshore and onshore components have not been appropriately evaluated, leading to a lack of clarity regarding the effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments related to marine ecology, seabirds, protected species, and

marine mammals are incomplete and, at times, inconsistent. The evidential threshold required to demonstrate the absence of adverse effects beyond reasonable scientific doubt has not been satisfied. This engages the precautionary principle, thereby precluding a lawful conclusion regarding the acceptability of the impacts.

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

In summary, the application presents both procedural and substantive deficiencies that render it unfit for determination. The extent of the informational gaps, coupled with conflicts with policy and unresolved environmental risks, obstructs a lawful and evidence-based decision-making process. Therefore, it is requested that the application for the Spiorad na Mara Offshore Wind Farm is refused in its entirety.

Additional Comments

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: 38FE66D0

Member of the public 1114

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 in accordance with marine licensing and Environmental Impact Assessment requirements. The objection arises from a thorough examination of the Environmental Impact Assessment Report and associated documents, revealing significant deficiencies across planning, environmental, cultural, and procedural aspects. The proposed development is located off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and a rich cultural heritage. The magnitude, proximity, and design of the project raise serious doubts about its alignment with statutory obligations, national policies, and sustainable development principles.

Crucial environmental data is absent, baseline information is both limited and inconsistent, and essential elements of the proposal remain unclear. The proposal employs a flexible design framework, which hinders a comprehensive understanding of potential significant effects. Moreover, the reliance on unspecified mitigation measures means their effectiveness cannot be evaluated. Consequently, the available documentation does not allow for a thorough understanding of the environmental, cultural, or community impacts, and the assertions of negligible or insignificant effects lack solid evidence.

The application demonstrates evident policy conflicts. It appears at odds with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health and wellbeing. It has not shown that it meets national requirements for safeguarding biodiversity, climate considerations, and environmental integrity. These conflicts are critical to the statutory tests necessary for granting consent and call into question whether the development can be deemed acceptable in policy terms.

The unprecedented scale of the proposal, with substantial turbines positioned in close proximity to the shoreline, raises significant issues regarding landscape capacity, visual impact, and environmental effects. Collectively, the lack of sufficient information, dependence on undefined mitigation measures, evidential shortcomings, and clear non-compliance with policy requirements illustrate that the application is incomplete and unable to support a lawful determination. In light of these circumstances, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary detail to adequately account for the potential environmental effects of the proposal. A flexible Project Design Envelope is used, which does not specify turbine dimensions, layouts, or configurations. This creates uncertainty and makes it difficult to apply a worst-case scenario consistently. As a result, the assessment may not accurately reflect the impacts of the final development, leaving both the public and the competent authority unaware of the true environmental consequences.

The application places significant reliance on mitigation measures, monitoring strategies, and management plans that have yet to be defined. This means that consent is being sought under the assumption that environmental harm will be addressed after approval, hindering any meaningful evaluation of these measures or the assessment of residual impacts. Such a deferral of important information to post-consent stages is not acceptable and contradicts the purpose of the Environmental Impact Assessment regime, which requires the establishment of likely significant effects and mitigation before a decision is made.

There are also notable evidential shortcomings, including missing baseline data, methodological limitations, and the use of assumptions instead of site-specific evidence. This leads to uncertainty about the scale and significance of impacts, especially where negligible or non-significant conclusions are drawn without adequate supporting data. The lack of sufficient information obscures the understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot align with statutory requirements.

Consequently, the application does not fulfil the evidential threshold needed under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This raises concerns related to the precautionary principle, particularly concerning protected species and sensitive habitats. The proposal also fails to meet the standards set by National Planning Framework 4, especially those related to biodiversity protection and environmental integrity, as it cannot demonstrate that impacts have been thoroughly assessed or that proper safeguards are in place.

In summary, the combination of an undefined design envelope, lack of specific mitigation, and gaps in baseline data leads to an unreliable and incomplete Environmental Impact Assessment Report. These issues hinder a lawful and thorough assessment of environmental effects, meaning the competent authority cannot make an informed decision based on the provided information.

ASSESSMENT OF ALTERNATIVES

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

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

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

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

From a policy standpoint, this deficiency compromises adherence to National Planning Framework 4, especially regarding the protection of natural environments, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission, contributing to the overarching conclusion that the application has not undergone adequate scrutiny and cannot facilitate a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

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

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

drawn regarding the absence of significant effects on otters.

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

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

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

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions results in an unreliable assessment. These critical deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species, ultimately indicating that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development on the west coast of the Isle of Lewis threatens internationally important seabird populations, which are already experiencing declines. The ornithological assessment associated with the application is fundamentally flawed, exhibiting significant gaps in evidence and internal inconsistencies that compromise its conclusions. It fails to adequately demonstrate that these species will not face adverse effects, particularly since the turbines are sited within key foraging areas and migratory pathways. The assessment lacks a robust evaluation of displacement, collision risk, or habitat loss, which is essential for understanding the potential impacts on these vulnerable birds.

Furthermore, the application presents a contradiction by asserting that there will be no significant adverse effects while concurrently advancing a Habitats Regulations derogation case, which is only required when significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment and indicates that its conclusions are not sufficiently supported by evidence. It does not

convincingly demonstrate that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these vital feeding grounds has not been fully acknowledged, and reliance on modelling approaches introduces uncertainty, particularly for species in severe decline like Kittiwakes and Fulmars. Additionally, the methodologies applied likely underestimate mortality rates, especially when baseline data is incomplete and behavioural responses are not well understood.

The placement of turbines in a recognised migratory corridor poses an additional and significant risk, effectively creating a barrier within a primary flight path for species migrating between the United Kingdom and Iceland. The assessment does not sufficiently evaluate the long-term implications of sustained mortality in this corridor or the potential repercussions for species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold required to affirm no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data gaps and limitations in modelling, fails to achieve the standard of beyond reasonable scientific doubt. This situation invokes the precautionary principle and undermines a lawful conclusion in favour of consent. Additionally, the deficiencies identified 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.

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency in the assessment of social impacts, health, and wellbeing represents a significant concern and undermines the lawful evaluation of the proposal. The developer commissioned a Social Impact Assessment, including focus groups with local residents, yet has not published the full report. This has resulted in a substantial evidential gap that prevents both the public and the competent authority from fully understanding the social risks identified in the developer’s own research.

Residents are already reporting measurable stress, anxiety, and concern regarding the scale and proximity of the proposal, with these impacts arising from direct engagement rather than speculation. However, the inability to access the complete assessment hampers proper scrutiny of the findings and restricts the capacity to evaluate their significance within the decision-making process.

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

with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. It is crucial to obtain a complete understanding of social, economic, and health impacts for developments of this scale, particularly when community character and functioning may be at stake. The application fails to provide a complete evidential basis for assessing the balance between benefits and harms due to the absence of the full dataset.

From a policy perspective, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Development should promote positive health outcomes and avoid harm; however, the available evidence indicates existing adverse effects that have not been fully disclosed. Without the complete assessment, demonstrating compliance with this policy is not possible.

The procedural implications are considerable. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This is a material omission within the application and signifies a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon and an undeveloped landscape that conveys a strong sense of remoteness. The assessment of seascape, landscape, and visual impacts is significantly lacking, failing to reflect the scale of change and the sensitivity of this environment. The introduction of large-scale turbines near the shoreline would establish a continuous and dominant industrial presence, fundamentally transforming the character of this area and leading to a permanent and irreversible alteration of the landscape.

This application does not adequately depict the extent of 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 defining qualities of naturalness and remoteness. The assessment inadequately conveys the level of this impact or its significance within such a sensitive landscape context.

Methodological issues are evident in the selection and presentation of visual viewpoints. Evidence indicates 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. This raises the possibility that the magnitude

of visual impact has been understated, which undermines the reliability of the overall assessment.

Another significant oversight is the failure to examine the interconnected relationship between landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to the broader landscape, linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these as isolated entities rather than acknowledging their interdependence, resulting in an incomplete evaluation of impacts on their context and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and their connection to the natural horizon. This not only reflects a visual impact but also indicates broader cultural and spatial harm that has not been thoroughly assessed within this application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4 concerning the protection of natural places and historic assets. The extent of change is incompatible with the need to safeguard landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the lack of a robust worst-case assessment further calls into question any claims of compliance with policy requirements.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and inescapable. As such, 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 capture the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the assertion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal's assessment of construction and pollution risks is significantly lacking in detail, failing to adequately evaluate the potential environmental effects. It involves considerable seabed preparation and installation works in a challenging high-energy Atlantic environment, yet there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans provided. Instead, the application relies on mitigation and contingency measures that are to be developed after consent, which hinders any meaningful assessment of their effectiveness or adequacy.

This reliance on vague future measures is alarming, particularly in light of the sensitive receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental

spills of chemicals or oil, it fails to detail how these risks will be prevented, managed, or monitored.

Moreover, there exists uncertainty about the extent and behaviour of sediment plumes resulting from seabed disruption and cable installation. Without robust modelling and clearly defined management strategies in place, it is impossible to ascertain the scale, duration, or ecological consequences of these impacts. This uncertainty is extended to potential effects on sensitive marine species and habitats that have already been identified in broader assessments.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning to a stage after consent, the application obstructs the ability to evaluate whether adequate safeguards are established to address pollution incidents. This introduces procedural risk and diminishes the competent authority's ability to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the postponement of crucial environmental safeguards is in direct conflict with the requirements of the Environmental Impact Assessment regime. Significant effects and their mitigation must be evaluated prior to consent, and in the absence of such information, a lawful determination cannot be achieved. Furthermore, the application does not demonstrate compliance with policy requirements regarding environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The proposal presents significant deficiencies in assessing the impacts on fisheries and marine life. It lacks a thorough evaluation of ecological and socio-economic consequences, particularly given the diverse marine ecosystem and the active fishing industry off the West Lewis coast. The application does not adequately demonstrate that these habitats and uses can be protected or maintained without substantial disruption.

A critical concern is the flawed assumption that fishing activities can be displaced without any repercussions. The absence of evidence regarding the availability or accessibility of alternative fishing grounds capable of absorbing additional pressure is a crucial omission. This gap raises serious risks of overfishing in other areas, which could have broader economic implications for the local fishing fleet. The lack of a clear, evidence-based assessment means 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. The anticipated high-energy hammer piling over a prolonged period is likely to cause disturbances over extensive distances, significantly affecting species such as dolphins. The potential disruption to a large proportion of the local bottlenose dolphin population is a major concern, yet the application diminishes the importance of these impacts without adequate supporting evidence.

There are evident inconsistencies within the application, where the requirement for licences to permit harm to European Protected Species is acknowledged, yet the impacts are simultaneously described as negligible. This contradiction undermines the assessment's credibility and raises serious questions regarding adherence to the Habitats Regulations, especially where harm is anticipated to an extent necessitating legal authorisation.

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

From a policy standpoint, the application does not align with the National Planning Framework 4 or the National Marine Plan. It does not sufficiently demonstrate that the development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity. This absence of compliance prevents any conclusion that the proposal represents sustainable development.

In summary, the overall lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the assessment all contribute to a conclusion that is incomplete and unreliable. These shortcomings hinder a robust evaluation of the impacts 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 fails to include any assessment of dark skies and nocturnal wildlife, which is a substantial oversight within the Environmental Impact Assessment. The West Lewis coastline is noted for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism value. By introducing permanent red aviation lighting that is visible over extensive distances, the proposal would create an intrusive "wall of light" across the western horizon, significantly altering the night-time environment.

Furthermore, there is no evaluation of how this lighting would impact visual amenity, landscape character, or the experiences of both residents and visitors. The importance

of dark skies to the region's identity and the emerging sectors of astro-tourism highlights the significance of this omission. Consequently, there exists a clear gap in the overall landscape and environmental assessment due to the lack of consideration for these impacts.

The proposal also neglects 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 susceptible to artificial light, which can lead to disorientation and an increased risk of collision. The absence of a lighting impact assessment or a study on phototaxis means that there is no understanding of how aviation lighting could affect these species or contribute to increased mortality rates.

Moreover, the reliance on daytime survey data in the ornithological assessment fails to account for nocturnal activity or related risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation due to artificial lighting, yet this risk has not been evaluated. The lack of site-specific night-time data creates a critical gap in understanding the ecological impacts.

Without a thorough assessment of nocturnal impacts, it remains impossible to ascertain whether protected species or designated sites would face adverse effects. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt cannot be met, thereby engaging the precautionary principle and precluding a lawful determination.

From a policy standpoint, the omission directly contravenes National Planning Framework 4 regarding the protection of natural places and environmental quality. Additionally, it undermines the broader evaluation of landscape and seascape impacts, as the character of night-time is a fundamental component of the environment.

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

TOURISM

The assessment regarding tourism impacts is severely inadequate and does not adequately evaluate the economic and social repercussions for a crucial part of the Isle of Lewis's economy. The island's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness are vital to tourism, which thrives on these natural attributes. The application recognises that 86% of visitors are attracted by the scenery, yet it neglects to provide a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or overall economic contributions.

Tourism has seen remarkable growth, rising from £65 million in 2017 to more than £81.5 million, while also supporting over 1,000 jobs and making up to 16% of the island's economy. However, the application does not assess how the industrialisation of the

seascape and degradation of environmental quality would affect Tourism Gross Value Added or the wider economic resilience of the area. Without this analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or harm an established and flourishing sector.

The assessment further neglects to recognise the crucial role of environmental quality in tourism, particularly the significance of unspoiled landscapes and dark skies for visitor satisfaction and the growth of niche markets like nature-based tourism and astro-tourism. The failure to include a Dark Skies Assessment exacerbates this deficiency, leaving a substantial gap in understanding the impacts on a recognised and expanding segment of the local economy.

Given the island community's limited economic diversification, the lack of assessment regarding tourism impacts has broader implications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been evaluated as mandated under the Islands (Scotland) Act 2018.

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

Collectively, the shortcomings in quantifying tourism impacts, analysing environmental factors influencing visitor behaviour, and recognising the island's economic dependency create a significant evidential gap. This 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 represents a significant failure to meet the standards of sustainable development as mandated by statutory duties, national policy, and evidential requirements. This application brings forth the same core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was clearly highlighted. Now, it is presented within a stronger policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

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

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

In direct contradiction to National Planning Framework 4, the proposal fails to provide evidence of biodiversity protection, preservation of natural places, and safeguarding of cultural heritage. It does not substantiate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. Furthermore, the cumulative impacts of both offshore and onshore elements have not been adequately assessed, obscuring their effects on peatlands, carbon balance, habitats, and crofting land.

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

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

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

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

Additional Comments

The proposed project is being justified in the name of “national security” and net-zero targets, and offers no meaningful mechanism to address fuel poverty for the people living here. Local residents would continue paying national-market electricity prices while hosting one of the largest energy infrastructure developments in the country. Without a guaranteed local energy tariff or another binding commitment that directly reduces household energy costs, this feels like a fundamentally exploitative mining of local natural resources in the name of "net-zero" and for the benefit of elsewhere. The proposed community fund should not be presented as a generous benefit. It is compensation for the permanent industrialisation of a landscape and coastline that

local people deeply value. A fixed fund subject to inflation cannot compare to the long-term financial relief that cheaper local energy could provide to ordinary households.

The west coast's sense of openness, wildness, and relative untouched character is part of the identity and wellbeing of the people who live here, and it also supports tourism and recreation. I am particularly concerned that there has been no dedicated study into the impact on surfing conditions around the west coast, on beaches such as Dalmore, Dalbeg and Barvas. There needs to be transparent data on how the turbine array could affect swell behaviour, wave quality, and sediment movement across the sandbanks that create these breaks.

The proposal seems to focus heavily on audible noise while giving insufficient attention to infrasound and low-frequency vibration. Residents in Barvas and surrounding areas deserve independent research into the potential long-term health impacts, especially given the unique coastal geography and the scale of the development being proposed.

Until there is a guaranteed direct benefit to local energy costs and far more rigorous environmental assessment, particularly regarding infrasound, marine ecology, and surfing conditions, I do not believe the claimed benefits outweigh the environmental and social costs for the local community.

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: F808BEF2

Member of the public 1115

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted under the marine licensing and Environmental Impact Assessment regimes. The concerns raised stem from a thorough examination of the Environmental Impact Assessment Report and accompanying documents, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural compliance. Situated off the west side of the Isle of Lewis, the proposed development exists in an area characterised by its Atlantic-facing coastline, near-pristine natural environment, and a strong cultural identity.

The application lacks a solid evidential foundation necessary for lawful determination. There are critical gaps in environmental data, while the baseline information presented is both limited and inconsistent, leaving many key elements of the proposal undefined. The reliance on a flexible design framework obstructs a clear understanding of potential significant effects, and the mitigation measures suggested remain unspecified, rendering their effectiveness unassessable. Consequently, the documentation does not facilitate a comprehensive understanding of environmental, cultural, or community impacts, with claims of negligible or non-significant effects lacking robust support.

Moreover, the proposal presents clear and substantive conflicts with policy. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. It fails to demonstrate compliance with national requirements intended to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests needed for consent and undermine the authority's ability to determine the proposal's acceptability in policy terms.

The unprecedented scale of the proposal, featuring large turbines in close proximity to the shoreline, raises substantial concerns about landscape capacity, visual dominance, and environmental impact. In light of the insufficient information provided, the reliance on undefined mitigation measures, evidential weaknesses, and clear non-compliance with policy, it is evident that the application is incomplete and unfit for lawful determination. Under these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate and fails to deliver a comprehensive, clear, or dependable account of the anticipated environmental effects of the proposal. The application employs a flexible Project Design Envelope that lacks

commitment to specific turbine dimensions, layouts, or configurations. This introduces considerable uncertainty and hinders a consistent application of a worst-case scenario. Consequently, the integrity of the assessment is compromised, making it impossible for the public and the competent authority to grasp the true extent of environmental impacts.

Moreover, the application leans heavily on mitigation measures, monitoring strategies, and management plans that are not yet defined. Seeking consent under the premise that environmental harm will be addressed later hampers any meaningful evaluation of effectiveness or assessment of residual impacts. This postponement of essential information to post-consent stages is procedurally unsound and contradicts the intent of the Environmental Impact Assessment regime, which necessitates that likely significant effects and mitigation measures are clearly established prior to decision-making.

There are also significant gaps in the evidence provided, including shortcomings in baseline data, methodological limitations, and an over-reliance on assumptions instead of site-specific evidence. These deficiencies result in uncertainty regarding the magnitude and significance of impacts, especially where conclusions of negligible or non-significant effects are presented without adequate supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, leading to scientific uncertainty that is incompatible with statutory obligations.

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

Overall, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the deficiencies in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings obstruct a lawful and robust assessment of environmental effects, leaving the competent authority unable to determine the application based on the information submitted.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species within the West Lewis coastal environment is fundamentally flawed, failing to deliver a complete understanding of the ecological receptors involved. This coastal area is known to be biologically rich and sensitive, yet the existing baseline data is insufficient, and the methods employed do not effectively capture essential information about species presence, behaviours, and habitat utilisation. Consequently, the assessment lacks a reliable evidential foundation for impact evaluation.

One significant shortcoming pertains to otters, classified as a European Protected Species. The application does not adequately address or evaluate the active utilisation of coastal regions by otters for foraging and movement. This oversight neglects their core foraging range and behavioural patterns, resulting in an inadequate assessment of the potential impacts related to construction disturbances, noise, and increased activity. Such a gap undermines any assertions regarding the lack of significant effects on otter populations.

Furthermore, there are serious shortcomings in the evaluation of basking sharks, particularly as it relies heavily on aerial surveys that are prone to considerable detection biases in Atlantic conditions. This methodology likely leads to an underestimation of the species' presence, especially when compared to established land-based observations that show regular usage of these waters. The failure to integrate or properly consider such crucial data contributes to an incomplete baseline, thereby diminishing the trustworthiness of the conclusions drawn.

These methodological flaws mean that any assertions of negligible or non-significant impacts are founded on assumptions rather than solid evidence. Additionally, the lack of comprehensive baseline data hampers a meaningful evaluation of cumulative and indirect effects, including those related to seasonal variations and broader ecosystem interactions. This introduces significant uncertainty regarding the actual risks to marine species and habitats.

From a regulatory viewpoint, the application does not satisfy the stipulations set forth by the Environmental Impact Assessment framework and National Planning Framework 4, as it fails to adequately identify or evaluate protected species. The uncertainty created by these inadequacies obstructs the possibility of ruling out adverse effects with reasonable scientific certainty, thus invoking the precautionary principle. In this context, granting consent would not be legally permissible.

In summary, the combination of incomplete baseline data, inadequate methodologies, and unsupported conclusions ultimately renders the assessment unreliable. These deficiencies hinder a thorough evaluation of impacts on marine ecology and protected species, affirming that the application does not present a solid evidential basis for approval.

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development raises serious concerns regarding its potential impact on the west coast of the Isle of Lewis, an area known for its internationally significant seabird populations, many of which are in decline. The ornithological assessment associated with this application is fundamentally flawed, presenting significant gaps in evidence and internal contradictions that cast doubt on its conclusions. While the application claims that there will be no significant adverse effects on these species, it simultaneously advances a case for Habitats Regulations derogation, which should only occur if significant harm is anticipated. This contradiction raises questions about the assessment's reliability and suggests that its conclusions lack the necessary

evidential support.

The assessment fails to demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of their feeding grounds is not adequately addressed, and the reliance on modelling techniques introduces uncertainties, particularly for species facing severe declines, like Kittiwakes and Fulmars. Moreover, the methodologies employed may underestimate mortality rates due to incomplete baseline data and a lack of understanding of behavioural responses.

Additionally, the proposed siting of turbines within a recognised migratory corridor poses a serious risk, potentially obstructing a primary flight path utilised by species migrating between the United Kingdom and Iceland. There is insufficient assessment of the long-term consequences of sustained mortality in this corridor, particularly for species with relatively small global populations. From a regulatory standpoint, the application does not meet the necessary evidential standard to demonstrate no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, alongside data gaps and modelling deficiencies, indicates that the required standard of proof beyond reasonable scientific doubt has not been met. This situation engages the precautionary principle, thereby hindering any lawful conclusion in favour of consent.

In light of these deficiencies, the application fails to comply with National Planning Framework 4 regarding biodiversity protection and the preservation of natural assets. The inability to prove that internationally important seabird populations will not be adversely impacted places the proposal in direct opposition to national policy. Taken as a whole, the assessment is rendered unreliable due to its internal inconsistencies, methodological weaknesses, and inadequate evidence, ultimately leading to the conclusion that it 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 vibrant cultural landscape where the environment, language, tradition, and community are deeply interwoven. It adopts an overly simplistic view by treating cultural heritage merely as isolated and unchanging assets, rather than as dynamic elements with ongoing social, cultural, and spiritual significance within the community.

Cemeteries at Dalmore, Bragar, and Barvas, which serve as active sites for burial and spiritual practices, are mischaracterised as static features. This oversight neglects their continuous use and meaning, as well as the potential effects of development on their surroundings. As a result, the evaluation of cultural impacts remains fundamentally incomplete and overlooks the vital role these sites play in community life.

Moreover, the absence of consideration for intangible cultural heritage, such as the Gaelic language, local traditions, and the longstanding connection between the

community and the coastal environment, is a critical shortcoming. These elements are essential to the identity of the area but have been completely disregarded in the assessment, leading to a failure in understanding the true cultural implications of the development.

There are serious concerns regarding community rights and engagement. The Gaelic-speaking population, possessing a distinct cultural identity akin to that of an Indigenous People, has not been consulted through a Free, Prior and Informed Consent process. This lack of meaningful engagement raises questions about the legitimacy of the assessment and contradicts established principles that promote participation in decisions impacting cultural and environmental interests.

Additionally, there is a significant procedural failure due to the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. This omission means the competent authority cannot legally assess the social, cultural, and economic impacts on the island community, rendering any determination unlawful.

These oversights also place the proposal at odds with the National Planning Framework 4, specifically concerning the protection of historic assets and spaces. The neglect of both tangible and intangible heritage and the failure to acknowledge living cultural practices clearly deviates from policy obligations.

Ultimately, the inability to adequately assess living heritage, intangible cultural value, community rights, and statutory requirements results in a significant evidential gap. The cultural impacts of the proposed development remain improperly evaluated, and the application lacks a sound basis for determining the genuine cultural costs involved.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The transparency surrounding the assessment of social impacts, health, and wellbeing is severely lacking, leading to significant concerns about the adequacy of the evaluation. Although the developer engaged in a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This gap in evidence restricts both public insight and the competent authority's understanding of the social risks highlighted in the developer’s own research.

Local residents are already feeling measurable stress, anxiety, and worry due to the scale and proximity of the proposed development. These effects are based on direct engagement with the community and are not speculative. However, the absence of the complete assessment hampers thorough scrutiny of the findings and limits the ability to evaluate their importance in the decision-making process.

Moreover, there is a perception among community members that the proposal threatens their identity and cohesion, with indications of "cultural loss" appearing in the developer’s findings. Unfortunately, these impacts have not been adequately considered in the main application, nor have they been given the weight they deserve.

The decision to withhold 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 the social, economic, and health impacts is vital for developments of this magnitude, especially when community character and functioning are at stake. Without the complete dataset, the application fails to provide a solid evidential foundation for weighing the benefits against the potential harm.

From a policy standpoint, the application falls short of demonstrating adherence to National Planning Framework 4 concerning health and wellbeing. Development should foster positive health outcomes and mitigate harm; however, the evidence currently suggests pre-existing adverse effects that have not been adequately disclosed. Therefore, without the full assessment, it is impossible to confirm compliance with this policy.

The implications for procedure are significant, as the competent authority cannot perform a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This represents a material omission in the application and a failure to meet 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 adverse impacts results in an incomplete and unreliable assessment. This inadequacy obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient information.

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 assessment of construction and pollution risks, which is incomplete and lacks the necessary detail to evaluate potential environmental effects. It involves considerable seabed preparation and installation work within a high-energy Atlantic environment. However, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included. Instead, the application relies on mitigation and contingency measures that are to be prepared after consent, hindering any meaningful evaluation of their adequacy or effectiveness.

The reliance on unspecified future measures raises particular concerns in light of the sensitivity of the receiving environment. The West Lewis coastline is known for its clean coastal waters and significant habitats, both of which are susceptible to sediment disturbance and contamination. Although the application acknowledges risks associated with sediment mobilisation and the potential for accidental chemical or oil

spills, it fails to offer sufficient detail on the prevention, control, or monitoring of these risks.

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

Further compounding these issues is the absence of detailed emergency response procedures. The decision to defer contingency planning until after consent prevents the evaluation of whether adequate safeguards will be in place to address pollution incidents. This introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures at the time of determination.

From a regulatory standpoint, deferring critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation measures be assessed prior to granting consent. In cases where this information is absent, a lawful determination cannot be achieved. Additionally, the application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The assessment of the proposed development's impact on fisheries and marine life is inadequate and does not provide a comprehensive evaluation of ecological or socio-economic repercussions. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing industry. However, the application does not adequately demonstrate how these habitats and uses can be preserved or sustained without significant disruption.

A critical concern is the presumption that fishing activities can be relocated without any adverse effects. The application fails to present any evidence indicating that alternative fishing grounds are available, accessible, or able to accommodate the increased pressure. This omission is particularly notable as displacement could lead to overfishing in other areas and could adversely affect the local fishing fleet's economic stability. The lack of a clear and evidence-based evaluation prevents a proper understanding of the implications for fisheries and the livelihoods dependent upon them.

Furthermore, the proposal poses considerable risks to marine species, especially due to the underwater noise produced during construction. The use of high-energy hammer piling for prolonged periods is likely to cause disturbances over considerable distances, adversely affecting species such as dolphins. The predicted disturbance to a substantial portion of the local bottlenose dolphin population raises significant concerns, yet the application minimises the importance of these impacts without adequate supporting evidence.

The application contains a noticeable inconsistency regarding the acknowledgement of the necessity for licences to permit harm to European Protected Species, while simultaneously categorising impacts as negligible. This contradiction undermines the reliability of the assessment and raises issues related to compliance with the Habitats Regulations, especially where harm is projected to the extent that requires legal approval.

Additionally, the assessment does not adequately consider cumulative impacts resulting from multiple pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. The absence of a thorough evaluation of these combined effects hampers the ability to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not show that the development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, which hinders any conclusion regarding the sustainability of the proposal.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The evaluation of the proposed infrastructure onshore is fundamentally inadequate, failing to encompass the full range of impacts associated with what constitutes a singular integrated project. The interdependence of offshore turbines and onshore works is clear; however, they are assessed in isolation, leading to a disjointed analysis that obscures the true magnitude of environmental and socio-economic repercussions.

Included within the onshore elements are the installation of cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through delicate landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a crucial carbon store and is an ecologically significant habitat. The application fails to deliver a thorough assessment of these consequences, hindering an accurate understanding of the project's comprehensive environmental impact.

The omission or delay in the evaluation of onshore effects prevents a proper appraisal of cumulative impacts. The Environmental Impact Assessment process mandates that all aspects of a project be reviewed collectively; nonetheless, the distinct treatment of offshore and onshore components means that the compounded effects on peatlands, habitats, and local communities remain insufficiently understood.

Significant risks to sensitive environments, including machair systems and peatland areas, which are subject to policy protections, are also a concern. The application does not adequately illustrate that these habitats have been fully examined for impacts or that suitable avoidance strategies have been established. This represents a significant evidential shortfall regarding biodiversity safeguarding.

Moreover, the routing of infrastructure through active croft land poses potential conflicts with current land use and legal entitlements. There is no documentation provided to confirm that the required consents or processes have been set in motion, casting doubt on both the feasibility and lawful execution of the project.

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

When considered collectively, the fragmented assessment of project components, the lack of a comprehensive evaluation, and the absence of evidence regarding environmental and land use impacts render this segment of the application both incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of any assessment regarding nocturnal wildlife and dark skies represents a significant oversight in the Environmental Impact Assessment. The dark skies along the West Lewis coastline are crucial to the area's cultural identity, environmental quality, and tourism potential. The introduction of permanent red aviation lighting, which would be visible over long distances, threatens to create an intrusive "wall of light" across the western horizon, fundamentally changing the night-time environment.

Furthermore, the application fails to evaluate the consequences of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This is particularly concerning as dark skies play a vital role in attracting emerging tourism sectors, such as astro-tourism. The omission of these critical impacts results in a substantial gap in the overall assessment of landscape and environmental factors.

Equally important is the lack of evaluation regarding the effects of artificial lighting on nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and

Leach's Storm Petrel are particularly sensitive to artificial light, which can disorient them and increase their risk of collision. The application does not provide a lighting impact assessment or a phototaxis study, failing to address how aviation lighting could affect these species or contribute to increased mortality rates.

Additionally, reliance on daytime survey data in the ornithological assessment misses the nocturnal activities of species like Kittiwakes, which may forage or migrate at night and are equally at risk of disorientation from artificial lighting. The absence of site-specific night-time data creates a critical void in understanding the ecological impacts involved.

Without a thorough assessment of the effects on nocturnal wildlife, it is impossible to ascertain whether protected species or designated sites might be adversely affected. The evidential standard needed to demonstrate the absence of adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, these omissions clash with the National Planning Framework 4, which seeks to protect natural places and environmental quality. This oversight undermines the overall evaluation of landscape and seascape impacts, as the character of night-time forms an essential aspect of the environment.

In summary, the complete absence of assessment regarding dark skies and nocturnal wildlife highlights a significant evidential gap. The lack of baseline data, impact modelling, and specific species analysis leaves the application incomplete and unable to support a lawful determination.

TOURISM

The assessment of tourism impacts related to the proposed development is significantly lacking and does not adequately evaluate the economic and social consequences for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the region's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. While the application acknowledges that 86% of visitors are attracted by scenery, it fails to provide a quantified analysis of how large-scale offshore infrastructure would impact visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism on the Isle of Lewis has experienced substantial growth, rising from £65 million in 2017 to over £81.5 million, while supporting more than 1,000 jobs and accounting for as much as 16% of the island's economy. Nevertheless, the application neglects to model how the industrialisation of the seascape and the potential loss of environmental quality would affect Tourism Gross Value Added or the wider economic resilience of the area. Without this crucial analysis, it remains unclear whether the proposed development would result in a net economic benefit or jeopardise a crucial and expanding sector.

Moreover, the assessment fails to acknowledge the significance of environmental quality in underpinning tourism, including the critical role that unspoiled landscapes and dark skies play in shaping visitor experiences and the growth of niche markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, creating a notable gap in understanding the impacts on a recognised and burgeoning segment of the local economy.

Given that the island community has limited economic diversification, the inadequate assessment of tourism impacts carries 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 evaluated in accordance with 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 establish a net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector and fails to supply 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 economic dependence of the island culminates in a substantial evidential gap. This deficiency hampers a thorough evaluation of the economic effects and underscores 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

Wind turbines especially of this scale are environmentally damaging. They create and generate electrical noise which the human body is subconsciously aware of. Not only this animals are even more attuned to this. Thus highly damaging.

This will also create massive noise and light pollution and support the destruction of the natural environment to a point that can never be undone.

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: B5633A4A

Member of the public 1116

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 in accordance with marine licensing and Environmental Impact Assessment frameworks. A thorough review of the Environmental Impact Assessment Report and accompanying documentation reveals significant deficiencies related to planning, environmental, cultural, and procedural matters. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and a strong cultural identity. The proposal raises serious concerns about its alignment with statutory requirements, national policy, and the tenets of sustainable development due to its scale, proximity, and design.

The application lacks an adequate evidential basis necessary for a lawful determination. There is a notable absence of critical environmental data, while the baseline information provided is both limited and inconsistent. Key components of the proposal remain unclear, and the flexible design framework employed hinders a proper assessment of likely significant effects. Furthermore, the reliance on unspecified mitigation measures calls into question their effectiveness, rendering the documentation inadequate for a comprehensive understanding of the potential environmental, cultural, or community impacts. Consequently, assertions of negligible or non-significant effects lack robust supporting evidence.

Policy conflicts are evident and substantial. 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 demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These conflicts directly undermine the statutory tests essential for obtaining consent and impair the competent authority's ability to determine whether the development is policy-compliant.

The scale of the proposal is unprecedented for this location, as it includes large turbines positioned very close to the shoreline, which raises serious concerns regarding landscape capacity, visual dominance, and environmental impact. In light of the insufficient information provided, reliance on undefined mitigation measures, evidential shortcomings, and clear policy non-compliance, it is evident that the application is incomplete and cannot support a lawful determination. Under these conditions, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a complete, transparent, or dependable overview of the potential environmental effects linked to the proposal. The introduction of a flexible Project Design Envelope, which lacks commitment to definitive turbine sizes, layouts, or configurations, creates considerable uncertainty. This ambiguity compromises the integrity of the assessment, resulting in impacts that may not accurately represent the development that will ultimately be constructed. Consequently, both the public and the competent authority are unable to grasp the true magnitude of the environmental effects.

The application significantly depends on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under these conditions suggests that any environmental harm will be resolved at a later stage, which obstructs a meaningful evaluation of effectiveness and an assessment of residual impacts. This postponement of crucial information until after consent is granted is procedurally inappropriate and contradicts the objectives of the Environmental Impact Assessment framework, which mandates that likely significant effects and mitigation measures must be clearly identified prior to determination.

Moreover, the application reveals substantial evidential shortcomings, such as gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. These factors lead to uncertainty surrounding the scale and significance of impacts, especially where claims of negligible or non-significant effects are made without adequate supporting data. The lack of sufficient information hinders a clear understanding of cumulative and worst-case impacts, thereby introducing scientific uncertainty that is inconsistent with statutory requirements.

As a result, the application does not satisfy the evidential threshold established under the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and vulnerable habitats. The proposal also fails to demonstrate adherence to the National Planning Framework 4, including its stipulations regarding biodiversity protection and environmental integrity, as it is not evident that the impacts have been fully assessed or that appropriate safeguards are in place.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies obstruct a lawful and robust evaluation of environmental effects, leaving the competent authority unable to determine the application based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application lacks a structured and evidence-based assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of providing a reasoned comparison of realistic alternatives based on their environmental effects, it offers a narrative account of project evolution. This deficiency indicates that the developer has not properly identified, assessed, or

selected less harmful options over more damaging ones.

There is a notable absence of transparent comparisons regarding alternative offshore locations, development scales, or design configurations. The application does not convincingly show that the developer has considered positioning the turbines further offshore, which would likely mitigate visual, ecological, and coastal impacts. The West Lewis coastline is particularly sensitive, and the significance of proximity to shore in determining impact makes the lack of such analysis a critical flaw. Consequently, it is impossible to ascertain that the proposed siting is indeed the least damaging option.

Moreover, the shortcomings extend to the assessment of cable routing and landfall, with insufficient evidence that alternative routes have been thoroughly examined to avoid or reduce impacts on sensitive receptors. This oversight includes regions of cultural and spiritual significance, such as Barvas Cemetery. The failure to provide a clear avoidance strategy or comparative analysis suggests that mitigation by design has not been adequately applied, relying instead on measures that come into play after the design phase.

As a result, the application does not demonstrate that environmental harm has been effectively minimised through site selection, layout, and infrastructure routing. This oversight represents a failure to adhere to the established mitigation hierarchy, leaving the competent authority without a clear understanding of whether less harmful and more appropriate alternatives are available. Without a robust assessment of alternatives, it cannot be concluded that the proposal is sustainable or compliant with policy.

From a policy standpoint, this lack of thoroughness 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, leading to the conclusion that the application has not undergone adequate evaluation and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The application presents significant deficiencies in the assessment of marine ecology and protected species, particularly within the context of the West Lewis coastal environment, which is noted for its sensitivity and biological activity. The methodologies employed in the assessment fail to adequately capture crucial information regarding species presence, behaviour, and habitat use, leading to an incomplete understanding of ecological receptors. Consequently, the evidential basis for evaluating impacts is insufficient.

A notable shortcoming involves the treatment of otters, recognised as a European Protected Species. The assessment does not adequately account for their active use of coastal areas for foraging and movement. The omission of their core foraging range and behavioural patterns results in a failure to assess the potential impacts of construction-related disturbance, noise, and increased activity. This oversight raises questions

about the validity of the conclusions drawn regarding the absence of significant effects on this species.

Further limitations are evident in the evaluation of basking sharks, where reliance on aerial surveys introduces significant detection bias, particularly under Atlantic conditions. This method is likely to underestimate the presence of these sharks, especially when compared with established land-based observations that suggest frequent usage of these waters. The lack of integration or proper consideration of such data contributes to an incomplete baseline, undermining the reliability of the conclusions reached.

The methodological flaws present in the assessment mean that the conclusions of negligible or non-significant effects are largely based on assumptions rather than on solid evidence. The absence of sufficient baseline data hinders the ability to conduct meaningful assessments of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty regarding the actual risks faced by marine species and habitats.

From a regulatory viewpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime or the National Planning Framework 4, as protected species have not been properly identified or assessed. The uncertainty introduced by these deficiencies prevents any exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it follows that consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment presented within the application is fundamentally flawed, characterised by significant gaps in evidence and internal inconsistencies that compromise 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 adequately demonstrate to the necessary evidential standard that these species will remain unaffected. The proposed development is situated within critical foraging areas and migratory routes, yet the assessment fails to effectively evaluate the risks associated with displacement, collision, or habitat loss.

There exists a fundamental contradiction in the application, as the developer asserts that there will be no significant adverse effects while also advancing a Habitats Regulations derogation case, which is only relevant in instances where significant harm is anticipated. This inconsistency raises questions regarding the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the

available evidence. Furthermore, the assessment lacks sufficient evidence to conclude 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 adequately acknowledged, and the reliance on modelling introduces uncertainty, particularly for declining species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate potential mortality, especially where baseline data is lacking and the behavioural responses of these species are not fully understood.

The placement of turbines within a known migratory corridor poses an additional and considerable risk, effectively creating 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 consequences of sustained mortality within this corridor or consider the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application fails to meet the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data deficiencies and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This invokes the precautionary principle, which precludes a lawful conclusion in support of consent. The identified deficiencies also demonstrate non-compliance with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to show that internationally significant seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is lacking and does not adequately reflect the significant changes that would occur or the sensitivity of the environment involved. The West Lewis coastline features an open Atlantic horizon, an undeveloped character, and a strong sense of remoteness. The introduction of large-scale turbines near the shoreline would create a continuous industrial presence, fundamentally altering the area's character and causing a permanent and irreversible transformation of the landscape.

The application does not fully represent the extent of this visual change. Due to the scale and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations. This situation would directly impact visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not adequately convey the level of impact or its significance concerning this sensitive landscape.

Methodological concerns also arise from the selection and presentation of visual viewpoints. Evidence suggests that these viewpoints may not fully capture the most sensitive receptors or worst-case scenarios, especially regarding key cultural heritage sites and valuable landscapes. This could mean that the magnitude of visual impact has been understated, which undermines the reliability of the assessment.

Another critical deficiency is the failure to examine the interconnected relationship between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape context linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as isolated entities without recognising their interdependence, leading to an incomplete evaluation of impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these connections, changing how heritage assets are experienced and altering their relationship with the natural horizon. This change represents not just a visual impact but also broader cultural and spatial harm that has not been adequately assessed in the application.

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4 regarding the protection of natural places and historic assets. The scale of change does not align with the requirements to safeguard landscape character, visual amenity, and the settings of culturally significant sites. Additionally, the lack of a robust worst-case assessment further undermines any claims of policy compliance.

Furthermore, the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. The resulting changes are fundamental and permanent, making them unable to be reduced to an acceptable level through mitigation.

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

FISHERIES AND MARINE LIFE

The assessment presented regarding fisheries and marine life is fundamentally inadequate, lacking a thorough evaluation of both ecological and socio-economic impacts. Off the West Lewis coast, there exists a rich marine ecosystem alongside a thriving fishing industry. However, the application does not provide assurances that these vital uses and habitats can be preserved or maintained without experiencing significant disruption.

A key concern arises from the assumption that fishing activities can be relocated without negative consequences. The application fails to furnish any evidence supporting the availability or accessibility of alternative fishing grounds that could

accommodate additional pressure. This significant gap in information raises the risk of overfishing in other areas and could lead to broader economic repercussions for the local fishing fleet. In the absence of a clear, evidence-based assessment, the potential impacts on fisheries and livelihoods remain poorly understood.

Additionally, the proposal poses considerable risks to marine species, primarily due to the underwater noise generated during construction. The anticipated high-energy hammer piling over extended durations is likely to disturb marine life across extensive distances, notably affecting species such as dolphins. The projected disturbance to a considerable portion of the local bottlenose dolphin population is particularly concerning, yet the application minimises the significance of these impacts without adequate supporting evidence.

There is a notable inconsistency within the application itself, where the necessity for licenses to permit harm to European Protected Species is acknowledged, while simultaneously describing impacts as negligible. This contradiction casts doubt on the assessment's credibility and raises issues regarding compliance with the Habitats Regulations, especially when harm is expected at levels necessitating legal authorisation.

Furthermore, the assessment neglects to address cumulative impacts that may arise from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. Without a comprehensive analysis of these interrelated effects, it is impossible to ascertain the overall impact on marine ecosystems and the socio-economic conditions surrounding them.

From a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not establish that the proposed development can coexist with existing marine users or prevent unacceptable impacts on marine biodiversity, thus obstructing any conclusions that the project can be considered sustainable.

In summary, the deficiencies highlighted—namely the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies—render the assessment incomplete and unreliable. These issues collectively hinder a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

The infrastructure onshore encompasses cabling across protected moorland, the construction of a substation near Stornoway, and the necessary access routes through

sensitive landscapes. These activities necessitate excavation in areas rich in deep peat, especially within Barvas Moor, which serves as an important carbon store and ecologically sensitive area. The application fails to deliver a thorough assessment of these impacts, which obstructs a complete comprehension of the project's overall environmental footprint.

By neglecting to assess onshore impacts or deferring such evaluations, the application precludes a proper analysis of cumulative effects. The Environmental Impact Assessment process mandates that all project components are examined collectively; however, the disjointed approach to offshore and onshore elements means that the compounded impacts on peatlands, habitats, and local communities remain inadequately understood.

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal fails to address the assessment of nocturnal wildlife and dark skies, resulting in a substantial omission from the Environmental Impact Assessment. This deficiency is particularly concerning as the West Lewis coastline is known for its exceptionally dark skies, which contribute significantly to the area’s environmental quality, cultural identity, and tourism value. The introduction of permanent red aviation lighting, which would be visible over long distances, creates a disruptive “wall of light” effect across the western horizon, fundamentally altering the night-time environment.

Moreover, the application does not evaluate how this lighting will impact visual amenity, landscape character, or the experiences of both residents and visitors. The importance of dark skies to the area's identity, particularly with the growing interest in

astro-tourism, makes this oversight even more significant. The lack of consideration for these impacts reveals a clear gap in the landscape and environmental assessment.

Additionally, there has been no examination of how the proposed lighting may affect nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to their phototactic responses, which can lead to disorientation and increased collision risks. The absence of a lighting impact assessment or a phototaxis study means that the potential effects on these species and their mortality rates have not been adequately assessed.

Compounding this issue is the reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal behaviours and associated risks. Other species like Kittiwakes, which may forage or migrate at night, are similarly at risk of disorientation from artificial lighting, yet their vulnerability has not been examined. The lack of site-specific night-time data creates a critical shortfall in understanding the ecological impacts involved.

Without a proper assessment of nocturnal impacts, it remains impossible to ascertain whether any protected species or designated sites would face adverse effects. The evidential standard required to rule out negative consequences beyond reasonable scientific doubt is not met, thereby invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, these omissions conflict with National Planning Framework 4, particularly regarding the protection of natural places and environmental quality. This oversight also compromises the overall evaluation of landscape and seascape impacts, as the character of night-time environments is an essential component of the broader ecological setting.

In summary, the absence of any assessment concerning dark skies and nocturnal wildlife constitutes a significant evidential gap. The lack of baseline data, impact modelling, and species-specific analysis means that the application is incomplete and does not support a lawful determination.

TOURISM

The assessment of tourism impacts is notably inadequate, lacking a thorough evaluation of the economic and social effects on a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and overall sense of remoteness. Although the application acknowledges that 86% of visitors are attracted by the scenery, it does not provide any quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the total economic contribution.

Significant growth in tourism has been observed, with revenue rising from £65 million in 2017 to over £81.5 million, facilitating more than 1,000 jobs and representing up to 16%

of the island's economy. Nonetheless, the application neglects to model the potential impacts of seascape industrialisation and the degradation of environmental quality on Tourism Gross Value Added and broader economic resilience. Without this crucial analysis, it remains unclear whether the development would yield a net economic benefit or adversely affect a well-established and expanding sector.

Furthermore, the assessment does not acknowledge the critical role that environmental quality plays in tourism, such as the significance of unspoiled landscapes and dark skies for enhancing visitor experiences and catering to emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a notable gap in understanding the potential impacts on a recognised and growing segment of the local economy.

In an island community that experiences limited economic diversification, the failure to evaluate tourism impacts has broader implications for employment, local businesses, and the sustainability of the community. The absence of a proper Island Communities Impact Assessment means that these economic vulnerabilities have not been addressed as stipulated by the Islands (Scotland) Act 2018.

From a policy perspective, the application does not demonstrate compliance with the National Planning Framework 4, particularly concerning economic impact and the necessity of proving net benefit. Additionally, it contradicts strategic objectives that recognise tourism as a priority growth sector and fails to provide adequate evidence for the competent authority to assess the economic repercussions of the proposal.

In summary, the lack of quantification of tourism impacts, failure to evaluate environmental factors influencing visitor behaviour, and disregard for the economic dependency of the island culminate in a significant evidential gap. This hinders a comprehensive assessment 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 necessary criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. It mirrors the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. Despite now being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application does not adequately address these concerns.

There are significant deficiencies in the evidential basis provided for consideration. The application lacks comprehensive baseline data, employs an undefined design envelope, and relies on unspecified mitigation measures. Moreover, it fails to include critical impact pathways, such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is insufficient, leaving uncertainties regarding likely significant effects and residual

impacts.

Procedural inadequacies further undermine the application. The failure to produce a compliant Island Communities Impact Assessment contravenes statutory obligations under the Islands (Scotland) Act 2018, and the non-disclosure of a complete Social Impact Assessment is a substantial omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, thus rendering the application unsuitable for determination.

Additionally, the proposal conflicts with National Planning Framework 4. It does not adequately protect biodiversity, natural spaces, and cultural heritage, fails to demonstrate that health and wellbeing impacts are acceptable, and lacks evidence of net economic benefits due to insufficient tourism impact modelling. The cumulative impacts of both offshore and onshore components have not been thoroughly assessed, obscuring their effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the project remain uncertain and may be significantly detrimental. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, inconsistent. The evidential threshold necessary to dismiss adverse effects beyond reasonable scientific doubt has not been met, invoking the precautionary principle and barring a lawful determination that impacts are acceptable.

The proposal would also lead to considerable and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual connections, and adverse impacts on tourism represent permanent changes that cannot be sufficiently mitigated.

In summary, the application is both procedurally and substantively inadequate for determination. The multitude of information gaps, alongside policy conflicts and unresolved environmental risks, impede 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.

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: 0F4DB3BE

Member of the public 1117

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 relevant marine licensing and Environmental Impact Assessment regimes. The objection is grounded in a review of the Environmental Impact Assessment Report and associated documents. It highlights significant deficiencies in planning, environmental assessments, cultural considerations, and procedural matters. The proposed development is situated off the west side of the Isle of Lewis, an area known for its Atlantic coastline, near-pristine environment, and rich cultural heritage. Concerns arise from the scale, proximity, and design of the project in relation to statutory obligations, national policy, and sustainable development principles.

The application lacks sufficient evidential support for a lawful decision. Important environmental data is absent, baseline information is inadequate and inconsistent, and key details of the proposal remain unspecified. The flexible design framework employed complicates understanding of potential significant impacts, and the reliance on unspecified mitigation measures means that their effectiveness cannot be evaluated. Consequently, the available documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, undermining claims of negligible or insignificant effects that lack robust backing.

There are evident and serious policy inconsistencies. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health. It does not adequately demonstrate compliance with national obligations to safeguard biodiversity, climate-related interests, and environmental integrity. Such conflicts directly affect the statutory tests necessary for consent and impair the competent authority's ability to determine the development's acceptability within policy frameworks.

This development's scale is unprecedented for the area, with large turbines proposed near the shoreline, raising significant issues about landscape capacity, visual impact, and environmental consequences. The combination of insufficient information, reliance on vague mitigation measures, evidential shortcomings, and clear policy violations indicates that the application is incomplete and unfit for lawful consideration. Given these factors, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and transparency, failing to deliver a dependable account of the anticipated environmental consequences

of the proposal. One significant concern is the flexible Project Design Envelope that does not commit to specific dimensions, layouts, or configurations of turbines. This introduces considerable uncertainty and hampers the consistent application of a worst-case scenario analysis, thereby compromising the integrity of the assessment. As a result, the impacts outlined may not truly represent the final development, obstructing both the public and the competent authority from grasping the actual environmental effects involved.

Furthermore, the application is heavily reliant on mitigation measures, monitoring strategies, and management plans that have yet to be defined. Seeking consent on the premise that environmental harm will be managed at a later stage undermines meaningful evaluation of their effectiveness and precludes thorough assessment of residual impacts. This deferral of crucial information to stages following consent is procedurally unacceptable and contradicts the core purpose of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation measures must be clearly established prior to determination.

There are also notable gaps in evidence, which include shortcomings in baseline data, methodological limitations, and the use of assumptions in lieu of site-specific evidence. Such deficiencies lead to uncertainty concerning the scale and significance of impacts, especially where claims of negligible or non-significant effects are made without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, resulting in scientific uncertainty that cannot satisfy statutory requirements.

Consequently, the application does not fulfil the evidential threshold mandated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, particularly regarding protected species and sensitive habitats. Additionally, the proposal fails to demonstrate adherence to National Planning Framework 4, which includes stipulations on biodiversity protection and environmental integrity, as it cannot be established that impacts have been thoroughly assessed or that appropriate safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The inadequacy of the assessment of alternatives raises serious concerns regarding compliance with the statutory requirements of the Environmental Impact Assessment regime. The application fails to provide a coherent and reasoned comparison of realistic alternatives based on their environmental effects. Instead, it offers a narrative detailing the evolution of the project, which does not convincingly illustrate that less

harmful options have been sufficiently identified, assessed, and selected over more damaging alternatives.

Moreover, there is a notable lack of transparent, evidence-based comparisons concerning alternative offshore locations, development scales, or design configurations. Specifically, the application does not adequately demonstrate that the developer has considered placing turbines further offshore, where the visual, ecological, and coastal impacts would likely be mitigated. The sensitivity of the West Lewis coastline, alongside the critical significance of proximity to shore in assessing impact, necessitates such analysis. The absence of this examination inhibits any determination that the proposed siting represents the least damaging option.

The shortcomings also affect the assessment of cable routing and landfall, revealing inadequate evidence that alternative routes have been thoroughly explored to minimise impacts on sensitive receptors, which include culturally and spiritually significant sites like Barvas Cemetery. The lack of a clear avoidance strategy, coupled with insufficient comparative analysis, suggests that there has been no application of mitigation by design, thus relying predominantly on post-design mitigation measures.

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

From a policy standpoint, this deficiency significantly undermines alignment with National Planning Framework 4, especially regarding the protection of natural places, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment represents a material omission, further contributing to the overarching conclusion that the application has not undergone adequate evaluation and thus cannot facilitate a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is fundamentally inadequate, lacking a thorough and reliable understanding of ecological receptors in this sensitive marine system. The methodologies employed are insufficient to accurately capture species presence, behaviour, and habitat utilisation, leading to a deficient evidential basis for evaluating impacts.

Particularly concerning is the omission of otters, classified as a European Protected Species, with the application failing to appropriately recognise their active use of coastal regions for foraging and movement. The neglect of their core foraging range and behavioural patterns undermines the assessment of potential impacts arising from

construction disturbance, noise, and heightened activity. Consequently, this oversight casts doubt on the conclusions drawn regarding the absence of significant effects on otters.

In addition, the assessment of basking sharks is flawed due to an over-reliance on aerial surveys, which introduces a significant bias in detection, especially in the Atlantic conditions. This method likely leads to an underestimation of their presence in these waters, particularly when juxtaposed with established land-based observations that demonstrate frequent use. The omission of such relevant data results in an incomplete baseline and diminishes the reliability of the conclusions presented.

The methodological shortcomings result in the conclusions regarding negligible or non-significant effects being based on assumptions rather than substantiated evidence. The lack of adequate baseline data hinders meaningful assessments of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty obscures the actual scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application fails to comply with the Environmental Impact Assessment regime and National Planning Framework 4, as it does not adequately identify or assess protected species. The level of uncertainty introduced prevents the exclusion of adverse effects beyond a reasonable scientific doubt, necessitating the application of the precautionary principle. Under these circumstances, the granting of consent cannot be justified legally.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions culminates in an assessment that is unreliable. These deficiencies obstruct a robust evaluation of impacts on marine ecology and protected species, leading to the overarching conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents a fundamentally flawed ornithological assessment that contains significant gaps in evidence and internal inconsistencies, which undermine its conclusions. The west coast of the Isle of Lewis hosts internationally important seabird populations that are already in decline. However, the application fails to demonstrate to the required evidential standard that these species will not be adversely affected. Key foraging areas and migratory pathways are directly impacted by the development, yet the assessment lacks a robust evaluation of the implications regarding displacement, collision risk, or habitat loss.

A notable contradiction arises in the application, where the developer asserts that there will be no significant adverse effects while simultaneously proposing a Habitats Regulations derogation case, which is typically warranted only when significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment, indicating that the conclusions drawn are not substantiated by the underlying evidence.

Furthermore, the assessment inadequately addresses the potential impacts on seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda. The significance of these feeding grounds is not thoroughly considered, and reliance on modelling approaches introduces uncertainty, particularly for severely declining species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality due to incomplete baseline data and an insufficient understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor creates a considerable risk, effectively establishing a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor are not adequately assessed, nor are the potential effects on species with relatively small global populations given the necessary attention.

From a regulatory standpoint, the application does not fulfil the evidential threshold required to confirm no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data gaps and modelling deficiencies, means that the standard of beyond reasonable scientific doubt has not been met. This situation engages the precautionary principle, which precludes a lawful conclusion in favour of consent.

Moreover, the deficiencies outlined reflect a failure to adhere to National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The application demonstrates a fundamental inadequacy in its assessment of cultural heritage and community identity, failing to acknowledge the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are interconnected. It adopts a reductive view, treating heritage merely as a collection of isolated, static assets and neglecting their ongoing social, cultural, and spiritual significance within the community.

There is a significant oversight in the assessment of culturally important sites, particularly the cemeteries at Dalmore, Bragar, and Barvas. These sites function as active places for burial and spiritual practice, yet they are mischaracterised as static features. This misrepresentation fails to consider their continued use and meaning, as well as the development's impact on their surroundings. Such an inadequate portrayal leads to an incomplete evaluation of cultural effects and disregards their integral role in

community life.

Moreover, the application neglects to address intangible cultural heritage, such as the Gaelic language and traditions, alongside the enduring relationship between the community and its coastal environment. These aspects are vital to the area's identity but have been entirely omitted from the assessment, indicating a serious lapse. Without incorporating these elements, the true cultural impact of the development remains obscured.

Concerns extend to community rights and engagement, particularly for the Gaelic-speaking population, which possesses a distinct cultural identity akin to that of an Indigenous People. However, the absence of a Free, Prior and Informed Consent process undermines the credibility of the assessment, neglecting essential principles of participation in decisions that affect cultural and environmental interests.

A critical procedural flaw lies in the lack of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. The omission of this assessment prevents the competent authority from fulfilling its legal obligations to evaluate the social, cultural, and economic impacts on the island community, making a lawful determination impossible.

From a policy perspective, these failures place the proposal at odds with the National Planning Framework 4, particularly concerning the protection of historic assets and places. The disregard for both tangible and intangible heritage, along with the failure to recognise living cultural practices, constitutes a clear deviation from policy requirements.

In summary, the failure to adequately assess living heritage, intangible cultural value, community rights, and statutory obligations results in a notable evidential gap. The cultural impacts of the development have not been thoroughly evaluated, and the application lacks a solid foundation for understanding the true cultural cost associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The absence of the complete Social Impact Assessment significantly undermines the transparency required for a lawful evaluation of the proposed development. Although a Social Impact Assessment was commissioned by the developer, including focus groups with local residents, the full report has not been made available. This lack of disclosure creates a considerable evidential gap, hindering both public understanding and the competent authority's ability to assess the full extent of social risks identified through the developer's own research.

Residents are already reporting measurable stress, anxiety, and concern due to the size and proximity of the proposal. These impacts stem from direct engagement with the community and are not speculative in nature. However, without access to the full assessment, there is a barrier to properly scrutinising the findings, which limits the

ability to evaluate their significance during the decision-making process.

The proposal is also viewed as a direct threat to community identity and cohesion, with "cultural loss" being highlighted in the developer's findings. Despite this, these serious impacts have not been adequately integrated into the main application or afforded the necessary weight. The withholding of the full Social Impact Assessment obscures the true human and social costs of the development.

This lack of transparency critically undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is vital for developments of this scale, particularly when community character and functioning may be affected. By failing to provide the complete dataset, the application does not present a comprehensive evidential basis to assess the balance between benefits and harms.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Development should foster positive health outcomes and avoid harm, yet the available evidence suggests existing adverse effects that remain undisclosed. Without the full assessment, it cannot be shown that compliance with this policy is achieved.

The procedural ramifications are significant as well. The competent authority is unable to perform a robust socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a material omission within the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

Ultimately, the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing adverse impacts, renders the evaluation incomplete and unreliable. This situation obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient information to be supported.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

context of such a sensitive landscape.

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

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

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal raises immediate concerns due to the incomplete assessment of construction and pollution risks, which fails to provide the necessary detail for evaluating environmental effects. In a high-energy Atlantic environment, substantial seabed preparation and installation works are proposed, yet there are no 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, which limits the ability to assess their adequacy or

effectiveness meaningfully.

Particularly alarming is the application's dependence on undefined future measures, especially given the sensitivity of the receiving environment. The West Lewis coastline features clean coastal waters and vital 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 lacks sufficient detail on the prevention, control, or monitoring of these issues.

Moreover, uncertainty surrounds the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, the potential extent, duration, or ecological effects of these impacts cannot be determined. This uncertainty also extends to the potential effects on marine species and habitats that have already been identified as sensitive within the broader assessment.

The absence of detailed emergency response procedures adds to these concerns. By postponing contingency planning to a post-consent phase, the application hinders the evaluation of whether adequate safeguards are in place to address pollution events. This introduces procedural risk and diminishes the competent authority's ability to assess environmental protection measures at the point of determination.

From a regulatory standpoint, deferring critical environmental safeguards contradicts the Environmental Impact Assessment regime's requirements. Significant effects and mitigation must be assessed before consent, and without 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.

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

FISHERIES AND MARINE LIFE

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

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

repercussions for the local fishing fleet. Without a clear, evidence-based assessment, the implications for fisheries and local livelihoods remain poorly understood.

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

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The evaluation of the onshore infrastructure is fundamentally lacking and does not take into account the full range of impacts from what constitutes a single integrated project. The offshore turbines are closely linked to the onshore works, yet they are assessed separately, leading to a disjointed approach that masks the true extent of environmental and socio-economic consequences.

The onshore components comprise cabling across protected moorland, the construction of a substation near Stornoway, and related access infrastructure through sensitive landscapes. Excavation in areas of deep peat, especially within Barvas Moor, poses risks to a significant carbon store and ecologically sensitive habitat. The

application falls short by failing to provide a detailed assessment of these impacts, which obstructs a full understanding of the project's overall environmental footprint.

By excluding or delaying the evaluation of onshore impacts, the application inhibits a proper assessment of cumulative effects. The Environmental Impact Assessment process requires that all aspects of a project be considered collectively. However, the disconnection between offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities remain unclear.

There are considerable risks to sensitive habitats, including machair systems and peatland environments, which are protected by policy. The application does not show that impacts on these habitats have been adequately assessed or that suitable avoidance measures have been implemented. This results in a significant evidential gap regarding biodiversity protection.

Concerns also arise regarding the carbon balance. Disturbance of peatland can release stored carbon, potentially creating a carbon debt that runs counter to renewable energy development goals. The application fails to address this issue sufficiently or prove 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 no evidence that the necessary consents or processes have been started, leading to doubts about the feasibility and lawful execution of the project.

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

Overall, the separation of project components, lack of thorough assessment, and absence of evidence on environmental and land use impacts render this segment of the application incomplete and unreliable, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding dark skies and nocturnal wildlife is a significant oversight in the Environmental Impact Assessment. The West Lewis coastline boasts exceptionally dark skies, which play a vital role in the area's environmental quality, cultural identity, and tourism appeal. The proposal includes permanent red aviation lighting that would be visible over long distances, resulting in a continuous and disruptive “wall of light” effect that would drastically change the night-time environment.

This application fails to evaluate how such lighting would impact visual amenity, landscape character, or the experiences of residents and visitors. This neglect is particularly troubling given the importance of dark skies to the local identity and the

emerging tourism sector focused on astro-tourism. Consequently, there is a pronounced gap in the overall landscape and environmental assessment.

Moreover, there is no evaluation of the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are notably sensitive to artificial lighting due to their phototactic behaviour, which can cause disorientation and increase the risk of collisions. The application lacks any assessment of lighting impacts or a phototaxis study, failing to address how aviation lighting could affect these species or potentially raise mortality rates.

This issue is further compounded by the dependence on daytime survey data in the ornithological assessment, which overlooks nocturnal activity and its associated risks. For instance, species like Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this risk has not been assessed. The absence of site-specific night-time data leaves a crucial gap in understanding ecological impacts.

Without an assessment of nocturnal effects, it is impossible to ascertain whether protected species or designated sites would suffer adverse impacts. The standard of evidence required to exclude such adverse effects beyond reasonable scientific doubt remains unmet, invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission contravenes the National Planning Framework 4 regarding the safeguarding of natural areas and environmental quality. Furthermore, it diminishes the comprehensive evaluation of landscape and seascape impacts, as the character of night-time is an essential element of the environment.

In summary, the failure to assess dark skies and nocturnal wildlife creates a significant evidential void. The absence of baseline data, impact modelling, and species-specific analysis renders the application incomplete and unfit to 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 application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed and fails to meet the requirements for sustainable development according to statutory duties, national policy, and evidential standards. This proposal echoes the critical issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. It is now presented under a more robust policy framework, which places increased importance on biodiversity, peatland protection, landscape integrity, and community wellbeing.

Significant gaps exist in the evidential basis necessary for a proper assessment. The application relies on an undefined design envelope and lacks clarity on specified mitigation measures. Key impact pathways, such as those affecting nocturnal wildlife, the complete onshore infrastructure, and tourism effects, have not been adequately addressed. Consequently, the Environmental Impact Assessment is incomplete, inhibiting a thorough understanding of likely significant effects or residual impacts.

Additionally, the proposal suffers from clear procedural inadequacies. The lack of a compliant Island Communities Impact Assessment breaches statutory requirements under the Islands (Scotland) Act 2018, while the failure to present a full Social Impact Assessment represents a substantial omission. These deficiencies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

It is also in direct contradiction to National Planning Framework 4, as it does not adequately protect biodiversity, natural places, or cultural heritage. The proposal fails to demonstrate acceptable health and wellbeing impacts and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. Furthermore, the cumulative impacts of both offshore and onshore components have not been sufficiently evaluated, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks are uncertain and potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in places. The evidential threshold required to demonstrate that adverse effects can be excluded beyond reasonable scientific doubt has not been satisfied, thereby invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

The proposal would result in considerable and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruptions to cultural and visual relationships, and negative impacts on tourism are permanent consequences 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, combined with conflicts with policy and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority must refuse consent on these grounds or invoke the relevant regulatory provisions to necessitate 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 am not against renewable energy, however these turbines will have a massive impact on our marine ecosystem,with no benefit to local residents. Indeed the location of these turbines I predict will lead to a further decline in our population as people will not want to return/relocate to an island that will be an eyesore, people visit here for our unspoiled views along our coastlines. I expect house prices to decline,recruitment will be impacted , I wouldn’t want to live here anymore (been here 37 years) we already struggle to recruit people to care for for an aging population.

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: 01B9696C

Member of the public 1118

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. A review of the Environmental Impact Assessment Report and its supporting documents has revealed significant deficiencies in planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and strong cultural heritage. The design, scale, and proximity of the proposal raise serious questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential foundation for a lawful decision. There are critical gaps in environmental data, with baseline information being both limited and inconsistent. Additionally, many essential elements of the proposal remain undefined. The adoption of a flexible design framework hampers a clear assessment of likely significant impacts, while the reliance on unspecified mitigation measures makes it impossible to evaluate their effectiveness. Consequently, the provided documentation fails to offer a comprehensive understanding of the environmental, cultural, or community impacts, and claims regarding negligible or non-significant effects lack robust evidential support.

There are also evident and significant policy contradictions. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regulations, or National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not establish that it can meet national obligations to safeguard biodiversity, climate concerns, and environmental integrity. These discrepancies directly relate to the statutory requirements for consent and compromise the capability of the competent authority to determine the development's acceptability from a policy standpoint.

The unprecedented scale of this proposal involves large turbines located in close proximity to the shoreline, raising substantial concerns regarding landscape capacity, visual dominance, and environmental repercussions. Collectively, the lack of adequate information, dependence on undefined mitigation strategies, evidential weaknesses, and clear non-compliance with policies indicate that the application is incomplete and incapable of supporting a lawful determination. In light of these factors, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The reliance on an undefined design envelope and the absence of specified mitigation measures critically undermine the Environmental Impact Assessment Report. This report is materially deficient, failing to provide a comprehensive, transparent, or reliable account of the potential environmental effects associated with the proposal. By introducing significant uncertainty, the flexible Project Design Envelope prevents a consistent application of a worst-case scenario, which raises concerns about the integrity of the assessment. Consequently, the impacts outlined may not accurately reflect what will be constructed, leaving both the public and the competent authority unaware of the true extent of environmental effects.

Furthermore, the application seeks consent based on mitigation measures, monitoring strategies, and management plans that remain undefined. This approach defers essential information to post-consent stages, obstructing a meaningful evaluation of their effectiveness or the assessment of residual impacts. Such procedural shortcomings conflict with the purpose of the Environmental Impact Assessment regime, which demands that significant effects and mitigation measures be established clearly before any determination can take place.

There are notable evidential deficiencies present, including gaps in baseline data, limitations in methodology, and a reliance on assumptions rather than site-specific evidence. These issues lead to uncertainty regarding the scale and significance of impacts, particularly where conclusions of negligible or non-significant effects are claimed without adequate supporting data. The lack of sufficient information obscures the understanding of cumulative and worst-case impacts, fostering scientific uncertainty that cannot align with statutory requirements.

Due to these inadequacies, the application does not satisfy the evidential threshold established under the Habitats Regulations, which is necessary to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate alignment with National Planning Framework 4, notably concerning biodiversity protection and environmental integrity, as it does not show that impacts have been thoroughly assessed or that suitable safeguards are in place.

In summary, the Environmental Impact Assessment Report's deficiencies—including its reliance on an unspecified design envelope, the lack of defined mitigation measures, and gaps in baseline data—render it unreliable and incomplete. These flaws hinder a lawful and rigorous assessment of environmental effects and leave the competent authority unable to make a well-informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application lacks a proper assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of a structured evaluation of realistic alternatives based on their environmental effects, it provides a narrative account of project evolution. This method does not show that less harmful

options have been identified, assessed, and selected over more damaging ones.

Furthermore, there is no clear or evidence-based comparison of different offshore locations, development scales, or design configurations. The developer has not convincingly considered the option of placing turbines further offshore, where potential visual, ecological, and coastal impacts might be lessened. Given the sensitivity of the West Lewis coastline, the importance of proximity to shore in determining impact cannot be overstated. The lack of analysis in this regard means that it cannot be concluded that the proposed location is the least damaging.

These deficiencies are also present in the assessment of cable routing and landfall. There is insufficient evidence that alternative routes have been adequately explored to mitigate impacts on sensitive areas, including cultural and spiritual sites such as Barvas Cemetery. The absence of a clear avoidance strategy and comparative analysis indicates a failure to implement mitigation by design, 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 shortcoming reflects a failure to adhere to the established mitigation hierarchy and hampers the competent authority's ability to determine whether there are less harmful and more suitable alternatives. Without a thorough assessment of alternatives, it is not possible to assert that the proposal is sustainable or compliant with policy.

From a policy standpoint, this inadequacy compromises adherence to National Planning Framework 4, particularly concerning the protection of natural environments, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment constitutes a significant omission, leading to the conclusion that the application has not undergone proper evaluation and cannot sustain a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species is fundamentally inadequate, failing to deliver a comprehensive and trustworthy understanding of the ecological receptors present in the West Lewis coastal environment. This area is notably sensitive and biologically active, yet the baseline data remains incomplete, while the methodologies employed are insufficient to capture the presence, behaviour, and habitat utilisation of species within this ecosystem.

A significant gap exists in the consideration of otters, which are classified as a European Protected Species. The application neglects to accurately identify and assess their use of coastal regions for foraging and movement. This oversight of their core foraging range and behavioural tendencies leads to an inadequate evaluation of potential impacts from construction disturbance, noise, and increased activity. Consequently, the conclusions drawn regarding the lack of significant effects on otters are undermined.

Further shortcomings appear in the evaluation of basking sharks, where reliance on aerial surveys results in a considerable detection bias, particularly in Atlantic conditions. This methodology likely underrepresents their presence, especially when juxtaposed with established land-based observations that show these waters are used frequently by the species. The failure to adequately incorporate or consider such data leads to a flawed baseline and diminishes the reliability of the findings presented.

These methodological shortcomings imply that the conclusions indicating negligible or non-significant effects rely more on assumptions rather than robust evidence. Furthermore, the lack of adequate baseline data obstructs a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates ambiguity regarding the actual level of risk faced by marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set forth by the Environmental Impact Assessment regime and the National Planning Framework 4, as the identification and assessment of protected species remain inadequate. The uncertainty this introduces prevents the dismissal of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these factors, granting consent would not be legally permissible.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These deficiencies hinder a thorough evaluation of impacts on marine ecology and protected species, thereby leading to the overarching conclusion that the application is devoid of a solid evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The application fails to meet the evidential threshold required to conclude that there will be no adverse effect on the integrity of protected sites. The assessment contains significant gaps in evidence, alongside internal inconsistencies that undermine its conclusions. Specifically, the west coast of the Isle of Lewis hosts internationally important seabird populations, many of which are already in decline, yet the application does not adequately demonstrate that these species will remain unaffected. Furthermore, the development is situated within key foraging areas and migratory pathways, but it does not sufficiently evaluate the implications of displacement, collision risk, or habitat loss.

A fundamental contradiction exists within the application, as the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is required only in instances where significant harm is anticipated. This inconsistency raises concerns about the reliability of the assessment and indicates that the conclusions drawn are not substantiated by the supporting evidence. The assessment fails to provide adequate proof that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain

unaffected. The significance of these feeding grounds is not fully acknowledged, and reliance on modelling approaches creates uncertainty, particularly for species facing severe decline, such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, particularly given the incompleteness of baseline data and the incomplete understanding of behavioural responses.

Moreover, the placement of turbines within a recognised migratory corridor introduces significant risk, effectively creating a barrier along a primary flight path for species travelling between the United Kingdom and Iceland. The application does not thoroughly assess the long-term implications of sustained mortality within this corridor or the potential effects on species with relatively small global populations. Collectively, the deficiencies identified constitute a failure to comply with the National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

In conclusion, the assessment is unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. These shortcomings hinder a robust 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 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 regarding the Social Impact Assessment is a critical concern that affects the community's ability to understand the potential consequences of the proposed development. Although the developer conducted a Social Impact Assessment, including discussions with local residents, the comprehensive report has not been made publicly available. This absence creates a substantial evidential gap, hindering both public insight and the competent authority's assessment of the social risks highlighted by the developer's own research.

Residents are reportedly experiencing significant stress, anxiety, and worry due to the scale and proximity of the proposal. These impacts are directly informed by local engagement and should not be dismissed as mere speculation. However, the failure to release the full report restricts thorough examination of these findings and limits the capacity to evaluate their importance in the decision-making process.

Furthermore, the proposal is perceived to pose a direct threat to the community's identity and cohesion, with "cultural loss" noted in the findings submitted by the developer. Nevertheless, these critical impacts have not been adequately addressed within the main application, nor have they been given the consideration they merit. By withholding the complete Social Impact Assessment, the developer obscures the genuine human and social costs of the development.

This lack of disclosure undermines the Environmental Impact Assessment process, as a thorough understanding of social, economic, and health impacts is vital for developments of this magnitude, especially when they may affect community character and functioning. The application falls short of providing a complete evidential foundation for weighing the benefits against the potential harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly concerning health and wellbeing. Developments are expected to promote positive health outcomes and mitigate harm, yet the evidence currently available suggests the presence of adverse effects that have not been fully revealed. Without the full assessment, it is impossible to confirm compliance with these policy requirements.

The procedural ramifications of these issues are considerable. The competent authority is unable to conduct a robust evaluation of socio-economic and health impacts without access to the complete Social Impact Assessment, which represents a significant oversight within the application and a failure to satisfy the evidential criteria of the Environmental Impact Assessment framework.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the shoreline would create a dominating industrial presence, which would fundamentally alter this character and lead to a permanent and irreversible transformation of the landscape. The assessment of seascape, landscape, and visual impacts fails to adequately reflect the magnitude of this change or the sensitivity of the environment.

This application does not properly convey the significant visual impacts resulting from the scale and location of the turbines. Their presence would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and eroding the qualities of naturalness and remoteness. Furthermore, methodological concerns arise regarding the selection and presentation of visual viewpoints; there is evidence that these viewpoints do not fully represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. Such omissions introduce a risk of underestimating the magnitude of the visual impact, undermining the reliability of the assessment.

Moreover, there is a notable deficiency in assessing the interconnected relationship between landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape context that connects visually and spatially to the Atlantic horizon. The assessment treats these heritage assets as isolated rather than recognising their interdependence, which leads to an incomplete evaluation of the impacts on their setting and cultural significance. The 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 represents a broader cultural and spatial harm that has not been sufficiently assessed.

From a policy standpoint, the proposal conflicts directly 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. Additionally, the lack of a robust worst-case assessment further undermines claims of compliance with policy. It is evident that the identified impacts cannot be effectively mitigated; the scale, height, and proximity of the turbines would result in a presence that is dominant and unavoidable. The resulting change is therefore fundamental and permanent, rather than one that could be reduced to an acceptable level through mitigation.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal for substantial seabed preparation and installation works within the high-energy Atlantic environment raises significant concerns due to the incomplete assessment of construction and pollution risks. The absence of fully developed Construction Environmental Management Plans and Pollution Prevention Plans means that there is insufficient detail to evaluate the likely environmental effects. Instead, the application relies on unspecified mitigation and contingency measures that are to be prepared post-consent. This approach not only hinders the meaningful assessment of their adequacy and effectiveness but also introduces uncertainty regarding the protection of the sensitive receiving environment.

The West Lewis coastline is known for its clean coastal waters and important habitats, which are at risk of sediment disturbance and contamination. Although the application does acknowledge risks such as sediment mobilisation and potential chemical or oil spills, it fails to provide adequate information on how these risks will be prevented, controlled, or monitored. Additionally, there is a lack of clarity about 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 impacts of these potential disturbances. This lack of information also extends to marine species and habitats identified as sensitive in the wider assessment.

Moreover, the failure to include detailed emergency response procedures exacerbates these concerns. By postponing contingency planning until after consent is granted, the application undermines the ability to assess whether appropriate safeguards will be in place to address pollution events. This procedural risk complicates the competent authority's ability to evaluate environmental protection measures at the determination

stage.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the Environmental Impact Assessment regime's requirements. Significant effects and necessary mitigation should be evaluated prior to consent; without this information, a lawful determination is not feasible. The application also does not demonstrate compliance with policies concerning environmental protection and water quality.

Ultimately, the deficiencies in defined mitigation measures, detailed management plans, and uncertainties about potential impacts render the assessment materially inadequate. These issues prevent a thorough evaluation of construction and pollution risks and highlight that the application is fundamentally incomplete.

FISHERIES AND MARINE LIFE

The application lacks a thorough evaluation of fisheries and marine life, failing to assess the ecological and socio-economic impacts adequately. The waters off the West Lewis coast host a rich marine ecosystem and an active fishing industry. However, the application does not prove that these habitats and uses can be preserved without major disruption.

A key concern is the assumption that fishing activities can be moved without negative effects. There is no evidence that alternative fishing areas are available or can handle the added strain. This is a critical gap, as displacing fishing efforts could lead to overfishing in other areas, negatively impacting the local fishing fleet's economy. Without a well-supported assessment, the effects on fisheries and local livelihoods remain unclear.

Additionally, the proposal poses serious risks to marine species, particularly due to underwater noise during construction. High-energy hammer piling for long periods is expected to disturb marine life across extensive areas, including dolphins. The anticipated disruption to a large portion of the local bottlenose dolphin population raises significant concerns, yet the application minimizes these effects without adequate evidence.

There is a notable inconsistency in the application, as it acknowledges the requirement for licences to harm European Protected Species while simultaneously claiming the impacts are negligible. This contradiction questions the reliability of the assessment and raises issues about compliance with the Habitats Regulations, especially when anticipated harm necessitates legal permission.

Furthermore, the assessment overlooks the cumulative impacts from various pressures such as habitat disturbance, noise pollution, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is essential to understand the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not show adherence to the National Planning Framework 4 or the National Marine Plan. It fails to demonstrate that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, hindering any assertion of sustainable development.

In summary, the gaps in evidence regarding fishing displacement, the minimization of acoustic impacts, and the internal contradictions lead to an incomplete and unreliable assessment. These shortcomings obstruct a thorough evaluation of the effects on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the proposed project lacks completeness, particularly concerning the onshore infrastructure, which is critical to understanding the full range of impacts associated with this integrated project. The offshore turbines and onshore works are fundamentally interconnected, yet the current assessment treats them separately. This fragmented approach obscures the true scale of the environmental and socio-economic consequences.

The onshore components encompass the installation of cabling across protected moorland, the construction of a substation close to Stornoway, and necessary access infrastructure that traverses sensitive landscapes. Notably, these activities involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a crucial carbon store and is an ecologically sensitive area. The application fails to provide a comprehensive assessment of the impacts on these environments, leading to an incomplete understanding of the overall environmental footprint of the project.

Moreover, the exclusion or deferment of onshore impact assessments prevents a thorough evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all aspects of a project be considered collectively; however, the division between offshore and onshore elements results in an inadequate understanding of the combined impacts on peatlands, habitats, and local communities.

Additionally, there are significant risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected under policy. The application does not convincingly demonstrate that the impacts on these habitats have been fully evaluated or that suitable avoidance measures have been implemented, resulting in a significant evidential gap regarding biodiversity protection.

Concerns also arise regarding carbon balance, as the disturbance of peatland can release stored carbon, leading to a carbon debt that contradicts the goals of renewable energy initiatives. The application does not sufficiently address this concern or prove that the overall carbon balance remains favourable.

Furthermore, routing the infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application does not show that the

necessary consents or processes have been initiated, calling into question the project's deliverability and legality.

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

In summary, the disjointed evaluation 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 untrustworthy, obstructing lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding nocturnal wildlife and dark skies represents a serious gap in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which play a crucial role in defining the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting, which can be seen from long distances, would create an intrusive and continuous "wall of light" across the western horizon, thereby fundamentally changing the night-time environment.

The application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This is particularly important given that dark skies contribute significantly to the area’s identity and to the growth of tourism sectors such as astro-tourism. The absence of this analysis leads to a notable deficiency in the overall landscape and environmental assessment.

Additionally, there is no consideration of the effects on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly sensitive to artificial lighting due to their phototactic responses, which can lead to disorientation and a higher risk of collisions. The application does not incorporate any lighting impact assessment or phototaxis study, failing to investigate how aviation lighting could impact these species or potentially raise mortality rates.

This issue is further complicated by the dependence on daytime survey data in the ornithological assessment, which does not account for nocturnal behaviours or risks. Species such as Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been evaluated. The lack of site-specific night-time data creates a significant void in understanding the ecological impacts.

Without an assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would face adverse effects. The necessary evidential standard to exclude adverse effects beyond reasonable scientific doubt cannot be achieved, which engages the precautionary principle and complicates lawful

determination.

From a policy standpoint, these omissions contradict the National Planning Framework 4, particularly regarding the protection of natural places and environmental quality. They also undermine the comprehensive evaluation of landscape and seascape impacts, as the character of the night-time environment is an essential component of the overall ecosystem.

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

TOURISM

The application presents a materially deficient assessment regarding the impacts on tourism, failing to evaluate the economic and social ramifications for a crucial sector of the Isle of Lewis economy. The tourism industry relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and its sense of remoteness. While it is acknowledged that 86% of visitors are attracted by the scenery, the assessment lacks a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism has seen significant growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and constitutes up to 16% of the island's economy. However, the application does not model the potential effects of seascape industrialisation and the loss of environmental quality on Tourism Gross Value Added or the broader economic resilience of the area. Without such crucial analysis, it remains impossible to ascertain whether the proposed development would yield a net economic benefit or detract from an established and burgeoning sector.

Moreover, the assessment inadequately considers the role of environmental quality in underpinning tourism, notably the value of unspoiled landscapes and dark skies to the visitor experience, as well as to emerging sectors such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortcoming, creating a significant gap in understanding the impacts on this recognised and expanding aspect of the local economy.

Given the context of an island community with limited economic diversification, the neglect of tourism impacts bears broader implications for employment, local businesses, and the sustainability of the community. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been appropriately evaluated as mandated by the Islands (Scotland) Act 2018.

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

highlight tourism as a priority growth sector, lacking sufficient evidence to enable the competent authority to assess the economic consequences of the proposal adequately.

In summation, the failure to quantify tourism impacts, evaluate environmental drivers of visitor behaviour, and consider the island's economic dependency leads to a significant evidential gap. This hinders a thorough evaluation of the economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails fundamentally to meet the criteria for sustainable development when evaluated against statutory obligations, national policy, and evidential requirements. It echoes the significant issues associated with the 2008 refusal of the Lewis Wind Power proposal, where the extent of industrialisation was deemed unacceptable. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it nonetheless falls short.

There are substantial deficiencies in the evidence provided for decision-making. The proposal does not offer a complete or trustworthy evidential basis, with critical gaps in baseline data. It utilises an undefined design envelope, relies on unspecified mitigation measures, and omits crucial impact pathways, particularly concerning nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, hindering a thorough understanding of the potential significant effects or residual impacts.

Moreover, procedural inadequacies are evident. The lack of a compliant Island Communities Impact Assessment breaches statutory duties outlined in the Islands (Scotland) Act 2018, and the failure to disclose a complete Social Impact Assessment is a significant omission. These shortcomings obstruct the competent authority's ability to evaluate effects on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for consideration.

The proposal directly contradicts National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural places, and cultural heritage. It fails to validate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, as there is no tourism impact modelling. The cumulative effects of both offshore and onshore components have not been properly analysed, concealing impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertainties regarding environmental risks are significant and concerning. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some areas, inconsistent. The necessary evidential threshold to dismiss adverse effects beyond reasonable scientific doubt has not been met, activating the precautionary principle and precluding a lawful conclusion that impacts can be deemed acceptable.

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

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

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

Additional Comments

The size of the wind turbines is absolutely ridiculous

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: 7372BE3E

Member of the public 1119

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

Dear Sir/Madam

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

There is a lack of adequate evidential support for a lawful decision. Essential environmental data is absent, baseline information is sparse and inconsistent, and critical aspects of the proposal remain unclear. The application employs a flexible design framework that obscures a clear assessment of potential significant effects, while the unspecified nature of proposed mitigation measures means their potential effectiveness cannot be evaluated. 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.

Moreover, the proposal presents clear and substantial conflicts with policy. It appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural habitats, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests for consent and compromise the competent authority's ability to conclude that the development aligns with policy requirements.

The unprecedented scale of this proposal, featuring large turbines situated close to the shoreline, raises significant concerns about landscape capacity, visual dominance, and overall environmental impact. The combination of insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and evident policy non-compliance underscores that the application is incomplete and unable to support a lawful determination. In light of these factors, the precautionary principle should be applied.

ASSESSMENT OF ALTERNATIVES

The application presents a narrative account of project evolution rather than a structured comparison of realistic alternatives based on their environmental effects. This approach fails to show that less harmful options have been properly identified, assessed, and chosen over more damaging solutions. The assessment of alternatives is materially inadequate and does not meet the statutory requirements of the Environmental Impact Assessment regime.

There is a lack of transparent, evidence-based comparisons of alternative offshore locations, development scales, and design configurations. Notably, the application does not indicate that the developer has seriously considered placing turbines further offshore, where visual, ecological, and coastal impacts would likely be lessened. The West Lewis coastline is sensitive, and the proximity to shore significantly affects impact determination. The absence of this analysis hinders any conclusion about whether the proposed siting is the least damaging option.

The deficiencies also include cable routing and landfall assessment, with insufficient evidence that alternative routes have been adequately explored to avoid or reduce impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis shows that mitigation by design has not been implemented, relying instead on post-design measures.

Due to these shortcomings, 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 and obstructs the competent authority from assessing whether less harmful and more suitable alternatives exist. Without a robust assessment of alternatives, it cannot be concluded that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this inadequacy undermines compliance with National Planning Framework 4, especially regarding the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant 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 fundamentally flawed, failing to deliver a comprehensive and reliable understanding of the ecological receptors present in the West Lewis coastal environment. This area is a biologically active and sensitive marine system, yet the methodologies used are inadequate, resulting in incomplete baseline data that do not capture the presence, behaviour, or habitat use of various species. Consequently, the assessment lacks a solid evidential basis for properly evaluating potential impacts.

A significant oversight is the failure to adequately recognise and assess the presence of otters, a species protected under European law, particularly concerning their foraging

and movement within coastal zones. The neglect of their core foraging range and behavioural patterns leads to an insufficient assessment of the potential effects of construction-related disturbances, such as noise and increased human activity. This omission undermines any claims made about the absence of significant effects on this species.

The assessment of basking sharks reveals further weaknesses, with an over-reliance on aerial surveys that carry a substantial risk of detection bias, especially under Atlantic weather conditions. This method is likely to underestimate the presence of these sharks, especially when compared to established land-based observations showing their regular use of these waters. The lack of proper consideration of such pertinent data results in an incomplete baseline, further diminishing the reliability of the conclusions reached.

These methodological shortcomings indicate that conclusions regarding negligible or non-significant effects stem from assumptions rather than solid evidence. The inadequate baseline data also hinder a thorough evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. As a result, there remains considerable uncertainty concerning the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not comply with the Environmental Impact Assessment requirements and the National Planning Framework 4, as it fails to accurately identify or assess protected species. The uncertainty introduced by these deficiencies prevents the ability to exclude adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these circumstances, granting consent is not legally justifiable.

Overall, the combination of incomplete baseline data, inadequate methodologies, and unsubstantiated conclusions renders the assessment unreliable. These significant deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species, leading to the conclusion that the application lacks a sufficient evidential foundation.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development fails to properly assess the cultural heritage and community identity associated with the West Lewis coastline, which should be recognised as a living cultural landscape where the environment, language, tradition, and community are deeply intertwined. The approach taken in the application is overly simplistic, treating heritage merely as a collection of isolated, static assets, rather than acknowledging their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming of the application is its treatment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet the assessment reduces them to static features without considering their continued use and significance or the potential

impact of development on their surroundings. This mischaracterisation leads to an inadequate evaluation of cultural effects, neglecting their integral role in community life.

Additionally, the assessment overlooks intangible cultural heritage, which includes the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These elements are vital to the area's identity and their absence from the evaluation represents a substantial omission. Without factoring in these aspects, it is impossible to gain a full understanding of the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population possesses a unique cultural identity with characteristics recognised under Indigenous People, yet the application lacks a process of Free, Prior and Informed Consent. The absence of meaningful engagement not only undermines the legitimacy of the assessment but also fails to adhere to established principles of participation concerning decisions that affect cultural and environmental interests.

Furthermore, a notable procedural failure is the lack of a compliant Island Communities Impact Assessment, as required under the Islands (Scotland) Act 2018. This absence hinders the competent authority's ability to meet its legal obligation to evaluate the social, cultural, and economic effects on the island community, thus preventing a lawful determination of the proposal.

From a policy standpoint, these shortcomings place the proposal at odds with National Planning Framework 4, particularly regarding the protection of historic assets and places. The lack of consideration for both tangible and intangible heritage, along with a failure to recognise living cultural practices, constitutes a clear departure from policy requirements.

In summary, the insufficient assessment of living heritage, intangible cultural value, community rights, and statutory obligations leads to a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application does not offer a solid foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's commissioned Social Impact Assessment, which included focus groups with local residents, remains unpublished in its entirety. This lack of transparency signifies a considerable evidential gap, impeding both public and competent authority understanding of the social risks identified through the developer's own investigation.

Available summaries reveal that residents are already facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement and are therefore factual rather than

speculative. However, the withholding of the complete assessment limits proper scrutiny of the findings and restricts the ability to evaluate their significance within the decision-making framework.

Moreover, there is evidence suggesting that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Yet, these social impacts have not been adequately incorporated into the main application or given the necessary weight. The lack of access to the full Social Impact Assessment obscures the true human and social cost associated with the development.

This absence of transparency fundamentally undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health implications is crucial for developments of this magnitude, especially when community character and functionality may be compromised. The failure to provide the complete dataset means that the application does not offer a comprehensive evidential basis for weighing the benefits against the harms.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Development should promote positive health outcomes and mitigate harm; however, the available evidence indicates existing adverse effects that have not been fully disclosed. Without the complete assessment, compliance with this policy cannot be established.

The procedural consequences are considerable. The competent authority cannot perform a robust socio-economic and health evaluation in the absence of the full Social Impact Assessment. This represents a significant omission within the application and indicates a failure to fulfil the evidential requirements outlined in the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, in conjunction with evidence of existing adverse effects, renders the assessment insufficient and unreliable. This situation obstructs a lawful determination and reinforces the conclusion that the application lacks adequate information to support it.

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 application presents an insufficient assessment of fisheries and marine life, failing to provide a robust evaluation of ecological or socio-economic impacts. A significant concern is the assumption that fishing activity can be displaced without any consequence. The application lacks evidence to support the availability, accessibility, or capacity of alternative fishing grounds to sustain additional pressure, which is crucial since displacement could lead to overfishing in other areas and potentially result in broader economic repercussions for the local fleet. The absence of a clear and evidence-based assessment means that the effects on fisheries and livelihoods remain inadequately understood.

Furthermore, the proposal poses considerable risks to marine species, especially through the underwater noise generated during construction. The use of high-energy hammer piling over an extended duration is predicted to cause disturbances across large distances, impacting species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises serious concerns; however, the application downplays the significance of these effects and does so without providing sufficient supporting evidence.

There is a notable inconsistency within the application regarding the need for licences to permit harm to European Protected Species, which is acknowledged while simultaneously describing the impacts as negligible. This contradiction undermines the assessment's credibility and raises questions about compliance with the Habitats Regulations, particularly in situations where harm is expected to a degree that necessitates legal authorisation.

The assessment also fails to address cumulative impacts stemming from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is necessary to determine the overall impact on marine ecosystems and socio-economic conditions.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment lacks a crucial assessment of dark skies and nocturnal wildlife, representing a significant oversight. The coastline of West Lewis is known for its exceptionally dark skies, which are essential to the area's environmental quality, cultural identity, and tourism potential. The proposal introduces permanent red aviation lighting, which would be visible over extensive distances and create a continuous “wall of light” effect across the western horizon, thus fundamentally changing the night-time environment.

Furthermore, the application does not evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This omission is particularly notable given the significance of dark skies to the local identity and the growth of tourism sectors such as astro-tourism. The lack of consideration for these impacts leads to a clear deficiency in the overall landscape and environmental

assessment.

Additionally, there is no investigation into the impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly vulnerable to artificial lighting due to phototaxis, which can cause disorientation and increase the risk of collision. The application fails to include any lighting impact assessment or phototaxis study, thus neglecting to evaluate how aviation lighting may affect these species or exacerbate mortality rates.

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

Without an assessment of nocturnal impacts, it becomes impossible to ascertain whether protected species or designated sites would experience adverse effects. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is unmet, thus invoking the precautionary principle and inhibiting a lawful determination.

From a policy standpoint, this omission is at odds with National Planning Framework 4 concerning the safeguarding of natural places and environmental quality. It also diminishes the overall assessment of landscape and seascape impacts, as the character of the night-time environment is a vital component of the overall ecosystem.

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

TOURISM

The assessment of tourism impacts associated with the application is significantly inadequate, failing to address the economic and social repercussions for a vital sector within the Isle of Lewis economy. It is critical to acknowledge that tourism relies heavily on the region's wild coastline, almost untouched landscapes, dark skies, and a prevailing sense of remoteness. While the application indicates that 86% of visitors are attracted by the scenery, it neglects to provide a quantified evaluation regarding how large-scale offshore infrastructure may influence visitor numbers, their behaviour, or the overall economic contribution of tourism.

The tourism sector has experienced considerable growth, increasing 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. Nonetheless, the application does not adequately model the potential impacts on Tourism Gross Value Added or the broader economic

resilience stemming from the industrialisation of the seascape and a decline in environmental quality. Without such a thorough analysis, it remains unclear whether the proposed development would yield a net economic benefit or pose a threat to an established and expanding sector.

Furthermore, the assessment disregards the critical role of environmental quality in enhancing tourism, particularly the significance of unspoiled landscapes and dark skies for visitor experiences, alongside emerging markets like nature-based tourism and astro-tourism. The failure to include a Dark Skies Assessment exacerbates this shortcoming, resulting in a considerable void in understanding the effects on a recognised and evolving segment of the local economy.

Given that the island community has limited economic diversification, the lack of an impact assessment on tourism holds broader implications for employment, local enterprises, and community sustainability. The failure to produce a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been properly evaluated, as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, particularly concerning economic impact and the necessity to illustrate a net benefit. It also stands in contradiction to strategic objectives that prioritise tourism as a growth sector, lacking sufficient evidence for the competent authority to assess the economic ramifications of the proposal.

In summary, the collective failure to quantify the impacts of tourism, evaluate environmental factors influencing visitor behaviour, and consider the economic dependency of the island culminates in a significant evidential gap. This shortcoming obstructs a thorough evaluation of the economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates a significant failure to meet the standards of sustainable development when evaluated against statutory obligations, national policy, and evidential requirements. The application echoes the fundamental issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, wherein the level of industrialisation was deemed unacceptable. Despite being submitted under a more robust policy framework that emphasizes biodiversity, peatland protection, landscape integrity, and community wellbeing, the application falls short in many areas.

A complete and reliable evidential basis for determination is absent, revealing critical gaps in baseline data. The continued use of an undefined design envelope, reliance on unspecified mitigation measures, and the exclusion of important impact pathways such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism effects contribute to an incomplete Environmental Impact Assessment. This deficiency hinders a comprehensive understanding of potential significant effects and residual

impacts.

Moreover, there are evident procedural shortcomings. The failure to provide a compliant Island Communities Impact Assessment constitutes a breach of statutory duty as outlined in the Islands (Scotland) Act 2018. Additionally, the lack of a full Social Impact Assessment represents a significant omission. These shortcomings impede the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

The proposal directly conflicts with National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural places, and cultural heritage, nor does it adequately address health and wellbeing impacts. Furthermore, the absence of tourism impact modelling means that a net economic benefit cannot be evidenced. Inadequate assessment of the cumulative impact of both offshore and onshore elements obscures the implications for peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Incomplete assessments regarding marine ecology, seabirds, protected species, and marine mammals, along with inconsistencies within the data, fail to meet the evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt. This raises concerns that engage the precautionary principle and prevent a lawful determination regarding the acceptability of impacts.

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

In summary, the application is procedurally and substantively unfit for determination. The numerous deficiencies in information, combined with conflicts with policy and unresolved environmental risks, hinder a lawful and evidence-based decision. Therefore, the competent authority is urged to either refuse consent on these grounds or invoke the necessary regulatory provisions to mandate the submission of the missing information.

It is 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: 1196EA61

Member of the public 1120

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted under the appropriate marine licensing and Environmental Impact Assessment frameworks. A review of the Environmental Impact Assessment Report and its associated documents reveals significant planning, environmental, cultural, and procedural shortcomings. The development site is situated off the west coast of the Isle of Lewis, an area recognised for its Atlantic-facing coastline, near-pristine conditions, and strong cultural heritage. The nature, scale, and proximity of the proposed development raise serious concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The proposal seeks consent based on an Environmental Impact Assessment Report that is fundamentally flawed. The report lacks a complete, transparent, and reliable

assessment of the potential environmental effects associated with the development. A flexible Project Design Envelope has been employed, which does not commit to specific turbine dimensions, layouts, or configurations. This approach introduces considerable uncertainty and hampers a thorough worst-case scenario analysis. Consequently, the integrity of the assessment is compromised, preventing both the public and the competent authority from fully grasping the true environmental impacts that may arise from the final development.

Moreover, the application heavily depends on mitigation measures, monitoring strategies, and management plans that have yet to be established. Seeking consent on the premise that environmental harm will be addressed in the future obstructs any meaningful evaluation of these measures or an assessment of residual impacts. This postponement of essential information to post-consent phases is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which stipulates that significant effects and mitigation must be thoroughly outlined before a decision is made.

Significant evidential deficiencies are present, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. Such shortcomings lead to uncertainty about the scale and significance of impacts, especially where conclusions of negligible or non-significant effects lack robust supporting data. The insufficient information impedes a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot align with statutory obligations.

As a result, the application does not satisfy the evidential threshold mandated by the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal fails to comply with National Planning Framework 4, including biodiversity protection and environmental integrity requirements, as it is not demonstrated that impacts have been comprehensively assessed or that suitable safeguards exist.

In summary, the reliance on an undefined design envelope, the lack of specified mitigation, and the gaps in baseline data contribute to the unreliability and incompleteness of the Environmental Impact Assessment Report. These shortcomings hinder a lawful and rigorous evaluation of environmental effects, leaving the competent authority without the necessary information to make a well-informed decision regarding the application.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species within the West Lewis coastal environment is fundamentally flawed, leading to an incomplete and unreliable understanding of ecological receptors. This area, known for its biological activity and sensitivity, is not adequately represented by the baseline data provided. The methodologies employed fail to effectively capture the presence, behaviour, and

habitat utilisation of crucial species. Consequently, the assessment falls short of offering a solid evidential basis for evaluating potential impacts.

One significant oversight pertains to otters, a species protected under European law, which are not sufficiently acknowledged in their use of coastal regions for foraging and movement. The assessment does not adequately consider their core foraging range and behavioural patterns. This oversight raises concerns about the evaluation of potential construction disturbances, noise, and increased activity, leaving the conclusions regarding the absence of significant effects on otters unsubstantiated.

Additionally, the assessment of basking sharks is compromised by an overreliance on aerial surveys, which introduce considerable detection bias, especially in the prevailing Atlantic conditions. This method is likely to underestimate the presence of these sharks compared to established land-based observations that reveal frequent utilisation of the waters. Such omissions lead to an incomplete baseline and compromise the reliability of the conclusions drawn.

These methodological shortcomings mean that assertions of negligible or non-significant effects are founded on assumptions rather than solid evidence. Furthermore, the lack of adequate baseline data hinders meaningful assessments of cumulative and indirect impacts, including seasonal changes and broader ecosystem interactions. This situation creates uncertainty about the actual risks posed to marine species and their habitats.

From a regulatory standpoint, the application does not fulfil the criteria set by the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify and evaluate protected species. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus necessitating the invocation of the precautionary principle. In light of these issues, it is clear that consent cannot be legally granted.

In summary, the assessment's unreliability stems from incomplete baseline data, inadequate methodologies, and unsupported conclusions. These critical flaws obstruct a thorough evaluation of impacts on marine ecology and protected species, reinforcing the conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application fails to demonstrate, to the required evidential standard, that the internationally important seabird populations on the west coast of the Isle of Lewis will not be adversely affected. This region supports many seabird species that are already in decline, yet the ornithological assessment provided is materially flawed, containing significant gaps in evidence and internal inconsistencies that undermine its conclusions. The assessment does not adequately evaluate the implications of habitat loss, displacement, or collision risk, despite the development being situated within key foraging areas and migratory pathways.

A fundamental contradiction exists in the application, where the developer asserts that there are no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case. This approach is only necessary when significant harm is anticipated, which raises serious doubts about the reliability of the assessment. It suggests that the conclusions drawn are not substantiated by the underlying evidence. Furthermore, the assessment does not convincingly establish that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The crucial importance of these feeding grounds is inadequately addressed, and the reliance on modelling methods introduces uncertainty, especially for species in severe decline, such as Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality rates, particularly where baseline data is lacking and the behavioural responses of the birds are not fully understood.

Additionally, the siting of turbines within a recognised migratory corridor poses a significant risk, as it effectively creates a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor have not been sufficiently assessed, nor have the potential effects on species with relatively small global populations been adequately considered.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and limitations in the modelling, means that the standard of beyond reasonable scientific doubt has not been achieved. This invokes the precautionary principle and prevents a lawful conclusion in favour of consent. The deficiencies noted also represent a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. Overall, 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 weaknesses, and lack of sufficient evidence. These shortcomings hinder a thorough evaluation of impacts and collectively lead to the conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is severely flawed, particularly in its treatment of the West Lewis coastline, which should be viewed as a dynamic cultural landscape where environment, language, tradition, and community are interconnected. Rather than recognising these elements, the application adopts a simplified perspective, treating cultural heritage as a collection of isolated, static assets. This approach neglects the active social, cultural, and spiritual roles these sites play within the community.

Significant deficiencies arise in the assessment of culturally important sites, notably

the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice. However, they are mischaracterised as static features, with the assessment failing to account for their ongoing use and significance, as well as the potential impacts of development on their surroundings. Such a mischaracterisation leads to an incomplete evaluation of cultural consequences and ignores their integral role in community life.

The assessment also neglects intangible cultural heritage, including the Gaelic language, local traditions, and the deep-rooted relationship between the community and its coastal environment. These elements are vital to the area's identity yet are omitted from the assessment, creating a considerable oversight. Without acknowledging these aspects, it is impossible to truly grasp the cultural implications of the proposed development.

Concerns regarding community rights and engagement are also apparent. The Gaelic-speaking population has a unique cultural identity recognised as characteristic of an Indigenous People. However, the process of Free, Prior and Informed Consent has not been pursued. This lack of meaningful engagement undermines the credibility of the assessment and disregards established principles regarding participation in decisions that affect cultural and environmental interests.

Additionally, the absence of a compliant Island Communities Impact Assessment constitutes a critical procedural failure. This assessment is mandated under the Islands (Scotland) Act 2018, and without it, the competent authority is unable to meet its legal obligation to assess the social, cultural, and economic impacts on the island community. This oversight alone makes it impossible to proceed lawfully with the proposal.

From a policy standpoint, these shortcomings place the proposal at odds with National Planning Framework 4, particularly concerning the preservation of historic assets and locations. The failure to adequately address both tangible and intangible heritage, alongside the need to acknowledge living cultural practices, represents a clear deviation from policy standards.

In summary, the deficiencies in assessing living heritage, intangible cultural value, community rights, and statutory obligations culminate in a substantial evidential gap. The cultural impacts of the development have not been thoroughly evaluated, and as a result, the application falls short of providing a sufficient basis for assessing the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal currently under consideration has significant deficiencies in the assessment of social impacts, health, and wellbeing. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents; however, the complete report remains unpublished. This creates a notable evidential gap, hindering both public understanding and the competent authority's ability to

assess the full range of social risks highlighted by the developer's own investigations.

Residents have reported experiencing measurable stress, anxiety, and concern linked to the scale and proximity of the proposal, as indicated by available summaries. These impacts are based on direct engagement, thus are not speculative in nature. Nevertheless, the lack of access to the full assessment curtails proper scrutiny of its findings and restricts the evaluation of their significance during the decision-making process.

Additionally, there is evidence suggesting that the proposal is viewed as a direct threat to community identity and cohesion, with findings from the developer indicating concerns over "cultural loss." Despite these impacts being identified, they have not been thoroughly incorporated into the main application or given due consideration. The failure to disclose the complete Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency fundamentally undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is critical for developments of this magnitude, especially when they may affect community character and functioning. The absence of the complete dataset means the application does not provide an adequate evidential foundation for weighing the benefits against the harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 with respect to health and wellbeing. Development proposals must foster positive health outcomes and avoid causing harm, yet the evidence currently available points to existing adverse effects that have not been fully disclosed. Without the complete assessment, it is impossible to establish compliance with this policy.

The procedural implications of these omissions are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a material deficiency within the application and a failure to satisfy the evidential requirements of 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 precludes a lawful determination and reinforces the conclusion that the application is not underpinned by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, seascape, and landscape is significantly inadequate and does not accurately reflect the scale of change or the sensitivity of the environment. The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and profound sense of remoteness. Introducing large-scale

turbines near the shoreline would result in a continuous and imposing industrial presence, fundamentally changing this character and leading to a permanent and irreversible transformation of the landscape.

Furthermore, the application fails to adequately represent the extent of this visual change. The size and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This would have a direct effect on visual amenity, diminishing the essential qualities of naturalness and remoteness. The assessment does not effectively communicate the significance of this impact, especially within such a sensitive landscape.

There are also critical methodological issues regarding how visual viewpoints have been selected and presented. Evidence indicates that the chosen viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and landscapes of high value. This raises concerns that the visual impact may have been understated, which undermines the credibility of the assessment.

Additionally, there is a failure to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Significant sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape interconnected by visual and spatial relationships to the Atlantic horizon. The assessment treats these as isolated entities rather than acknowledging their interdependence, leading to an incomplete analysis 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 issue represents not only a visual impact but also a broader cultural and spatial harm that has not been sufficiently addressed within the application.

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

Lastly, it is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. The resulting change is, therefore, fundamental and permanent, rather than capable of being reduced to an acceptable level through mitigation.

In conclusion, 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 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 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.

FISHERIES AND MARINE LIFE

The application fails to provide a comprehensive assessment of fisheries and marine life, resulting in an inadequate evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry, yet the proposal does not demonstrate how these vital

uses and habitats can be adequately protected or maintained without causing significant disruption.

One critical concern is the flawed assumption that fishing activities can be displaced without consequences. The application lacks evidence that alternative fishing grounds are available, accessible, or capable of supporting the additional pressures from such displacement. This significant oversight raises the risk of overfishing in other areas and may lead to wider economic repercussions for the local fishing fleet. Without a clear, evidence-based assessment, the true impacts on fisheries and livelihoods remain unclear.

Additionally, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over an extended duration is likely to create disturbances over large distances, adversely affecting species such as dolphins. The predicted disturbance to a significant portion of the local bottlenose dolphin population is alarming, yet the application downplays these effects, lacking adequate supporting evidence.

There are notable inconsistencies within the application itself; it acknowledges the necessity of licenses 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 concerns regarding compliance with the Habitats Regulations, especially when harm is expected to a degree that requires legal authorisation.

Moreover, the assessment overlooks the cumulative impacts stemming 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 socio-economic conditions cannot be adequately assessed.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 or the National Marine Plan. It fails to show that the development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, thereby obstructing any conclusion that the proposal can be considered sustainable development.

In conclusion, the deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions within the application culminate in an incomplete and unreliable assessment. These shortcomings hinder a robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the proposed onshore infrastructure is inadequate and fails to address the full range of impacts associated with what constitutes a single integrated project. There is a fundamental connection between the offshore turbines and the

onshore works, yet these components are evaluated in isolation. This fragmented assessment obscures the comprehensive understanding of the environmental and socio-economic repercussions that arise.

The onshore infrastructure encompasses cabling across protected moorland, the construction of a substation near Stornoway, and the necessary access routes through sensitive landscapes. These activities involve excavation in regions of deep peat, specifically within Barvas Moor, which serves as a critical carbon store and is an ecologically fragile habitat. The application lacks a thorough assessment of these impacts, which hinders a complete understanding of the overall environmental footprint of the project.

By not adequately addressing the onshore impacts, the application inhibits a proper evaluation of cumulative effects. According to the Environmental Impact Assessment process, it is essential that all elements of a project are considered collectively. The current separation of offshore and onshore elements means the combined impacts on peatlands, habitats, and local communities remain poorly understood.

Moreover, there are significant risks posed to sensitive habitats, including machair systems and peatland environments, which are protected under existing policies. The application fails to demonstrate that impacts on these critical habitats have been thoroughly assessed or that suitable avoidance measures are in place, resulting in a concerning evidential gap regarding biodiversity protection.

Concerns also arise about the carbon balance related to this proposal. Disturbance of peatland has the potential to release stored carbon, thereby creating a carbon debt that contradicts the goals of renewable energy initiatives. The application does not sufficiently address this matter or provide assurance that the overall carbon balance remains advantageous.

Additionally, routing infrastructure through active croft land introduces potential conflicts with established land use and legal rights. The application does not supply evidence that the necessary consents or processes have been initiated, which raises significant doubts about deliverability and the lawfulness of implementation.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment is notably lacking in its evaluation of dark skies and nocturnal wildlife, which constitutes a significant oversight. The West Lewis coastline is known for its exceptionally dark skies, a crucial aspect of both environmental quality and cultural identity, as well as an important factor for tourism. The proposed installation of permanent red aviation lighting would create a continuous "wall of light" effect that could be seen from long distances, fundamentally changing the night-time landscape.

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

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

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

Without a thorough assessment of nocturnal impacts, it remains unclear whether protected species or designated sites could be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, which invokes the precautionary principle and calls into question the legality of the proposal.

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

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

TOURISM

The assessment of the tourism impacts is inadequate and does not evaluate the economic and social consequences for an important sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, nearly untouched landscape, dark skies, and sense of remoteness. While the application states that 86% of visitors are attracted by the scenery, it lacks 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, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. However, the application fails to model the impact of industrialisation on the seascape and the loss of environmental quality on Tourism Gross Value Added or overall economic resilience. This lack of analysis means it is impossible to determine whether the development would provide a net economic benefit or harm a vital and expanding sector.

Additionally, the assessment overlooks the significance of environmental quality in promoting tourism, including the value of unspoiled landscapes and dark skies for visitor experience and emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further highlights this shortcoming, leaving a major gap in understanding the impacts on a recognised and growing segment of the local economy.

In an island community with limited economic diversity, the neglect of tourism impact assessments poses broader implications for employment, local businesses, and community sustainability. The failure to conduct a proper Island Communities Impact Assessment means 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 need to show net benefits. It also contradicts strategic objectives that prioritise tourism as a growth sector and lacks sufficient evidence for the competent authority to evaluate the economic consequences of the proposal.

Overall, the inability to quantify tourism impacts, assess environmental factors that drive visitor behaviour, and acknowledge the island's economic dependency results in a significant evidential gap. This hampers a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal embodies significant shortcomings in relation to sustainable development, as assessed against statutory requirements, national policy, and evidential standards. This application raises similar concerns to those that led to the rejection of the Lewis Wind Power proposal in 2008, particularly regarding the unacceptable scale of industrialisation. The current proposal is presented

under a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it falls short of these expectations.

There are notable deficiencies in the evidential basis provided for the application. It lacks complete baseline data and continues to use an undefined design envelope, while also relying on unspecified mitigation measures. Furthermore, critical impact pathways, such as those affecting nocturnal wildlife, onshore infrastructure, and tourism, have not been adequately addressed. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a thorough understanding of likely significant effects or residual impacts.

Procedural shortcomings are evident in the absence of a compliant Island Communities Impact Assessment, which violates the statutory duty under the Islands (Scotland) Act 2018. Additionally, the failure to disclose the full Social Impact Assessment constitutes a significant omission. These issues hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

Moreover, the proposal conflicts with National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural places, and cultural heritage, fails to show 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 offshore and onshore elements has not been properly assessed, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainty looms over environmental risks, with incomplete assessments of marine ecology, seabirds, protected species, and marine mammals. These assessments display internal inconsistencies and do not meet the evidential threshold required to exclude adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

Additionally, the proposal is set to cause substantial and irreversible changes to a sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruptions to cultural and visual relationships, and impacts on tourism are all permanent effects that cannot be mitigated adequately.

In summary, the application is fundamentally flawed both procedurally and substantively. The combination of information deficiencies, policy conflicts, and unresolved environmental risks obstructs a lawful, evidence-based decision. Therefore, the competent authority is urged to refuse consent for the Spiorad na Mara Offshore Wind Farm application in its entirety.

Additional Comments

I am a surfer from the isle of Lewis and the impact that this would have on the surf culture of the island and the damage to wildlife would be massive. This could ruin the surf all across the west side of the island and many popular beaches along the west coast also affecting tourism. There is no benefits at all to locals and all this will do is cause permanent damage to the place we love.

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: 93186329

Member of the public 1121

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The objection arises from a review of the Environmental Impact Assessment Report and associated documentation, highlighting significant deficiencies across planning, environmental, cultural, and procedural aspects. The development is proposed off the west side of the Isle of Lewis, an area notable for its Atlantic-facing coastline, nearly pristine environment, and strong cultural heritage. The design, scale, and proximity of the proposal raise serious concerns about its alignment with statutory obligations, national policy, and sustainable development principles.

The application does not establish an adequate evidential basis for a lawful decision. Critical environmental data is absent, baseline information is insufficient and inconsistent, and essential elements of the proposal remain unclear. The application employs a flexible design framework, which obscures a clear understanding of potentially significant effects, while the reliance on unspecified mitigation measures prevents any assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidence.

There are evident and 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 landscapes, cultural heritage, and health and wellbeing. It does not convincingly demonstrate compliance with national obligations to protect biodiversity, climate considerations, and environmental integrity. These discrepancies directly affect the statutory requirements for consent and impede the competent authority's ability to deem the development acceptable in policy terms.

The unprecedented scale of the proposal, with large turbines situated in close proximity to the shore, raises significant issues regarding landscape capacity, visual impact, and environmental ramifications. The combination of insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance illustrates that the application is incomplete and unsuitable for lawful determination. In light of these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate, failing to deliver a thorough, transparent, and dependable account of the environmental consequences of the proposed project. A flexible Project Design Envelope, which lacks specific commitments to turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This ambiguity hinders the ability to apply a worst-case scenario consistently, ultimately compromising the integrity of the assessment. As a result, the presented impacts may not accurately reflect the final development, thereby obstructing both public understanding and the competent authority's ability to gauge the true extent of environmental effects.

Significant reliance on yet-to-be-defined mitigation measures, monitoring strategies, and management plans is evident in the application. Seeking consent on the premise that environmental harm will be mitigated at a future date precludes any meaningful evaluation of effectiveness or residual impacts. This postponement of critical information to post-consent phases is procedurally unacceptable, conflicting with the aims of the Environmental Impact Assessment regime, which necessitates that likely significant effects and mitigation are clearly defined prior to determination.

Evidential deficiencies are also present, with noticeable gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This situation creates uncertainty about the scale and significance of impacts, particularly when conclusions 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 and introduces scientific uncertainty that cannot align with statutory requirements.

Consequently, the application does not meet the evidential threshold outlined in the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Moreover, the proposal does not demonstrate adherence to National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it fails to show that impacts have been fully assessed 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 renders the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings obstruct a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make an informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives presented in this application is inadequate and fails to meet the necessary statutory requirements of the Environmental Impact Assessment regime. Rather than offering a well-structured comparison of realistic alternatives based on environmental effects, the application provides a narrative of project evolution. This lack of analysis does not demonstrate that less harmful options have

been properly identified, assessed, and selected over more damaging solutions.

In particular, there is no clear or evidence-based comparison of various offshore locations, development scales, or design configurations. The application does not show that the developer has seriously considered placing turbines further offshore, where visual, ecological, and coastal impacts would likely be reduced. The sensitivity of the West Lewis coastline, along with the critical importance of proximity to shore in determining impact, underscores the necessity for this analysis. The absence of such consideration undermines any claim that the proposed siting is the least damaging option available.

Furthermore, these shortcomings extend to the assessment of cable routing and landfall, as there is insufficient evidence that alternative routes have been adequately explored to minimise impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The lack of a clear avoidance strategy and failure to conduct comparative analysis suggest that mitigation by design has not been employed, with a reliance instead on post-design mitigation measures.

As a consequence, the application does not demonstrate that environmental harm has been minimised through thoughtful site selection, layout, and infrastructure routing. This failure to adhere to the established mitigation hierarchy prevents the competent authority from determining whether more appropriate and less harmful alternatives exist. The absence of a robust alternatives assessment further casts doubt on the sustainability and policy compliance of the proposal.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The coastal environment of West Lewis is a biologically active marine system that requires thorough ecological assessment. However, the assessment of marine ecology and protected species presented in the application is significantly lacking. It fails to provide a reliable understanding of ecological receptors in this sensitive area due to incomplete baseline data and methodologies that do not adequately capture the presence, behaviour, and habitat use of various species. Consequently, this deficiency compromises the evaluation of potential impacts on the ecosystem.

Specifically, otters, classified as a European Protected Species, have not been properly recognised within the assessment. The application overlooks their active use of coastal regions for foraging and movement, leading to an inadequate analysis of how construction disturbance, noise, and increased activity could affect these animals. This failure to assess their core foraging range and behavioural patterns casts doubt on the

conclusions regarding the absence of significant effects on otters.

Additionally, the assessment of basking sharks suffers from methodological flaws. It relies heavily on aerial surveys, which introduce a notable detection bias, particularly under Atlantic conditions. This reliance risks underestimating the presence of basking sharks, especially when compared to established land-based observations that demonstrate frequent use of these waters. Neglecting to incorporate or adequately consider such data results in an incomplete baseline, which further undermines the reliability of the conclusions drawn.

Due to these methodological limitations, the assessment's findings of negligible or non-significant effects are based more on assumptions than on solid evidence. The lack of comprehensive baseline data hinders any meaningful assessment of cumulative and indirect impacts, including those related to seasonal variations and broader ecosystem interactions. This raises uncertainties about the actual risks facing 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 has failed to identify or assess protected species appropriately. This uncertainty prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Given these circumstances, it follows that consent cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions results in an unreliable assessment. These deficiencies obstruct a comprehensive evaluation of impacts on marine ecology and protected species and highlight the overarching issue that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application proposes the development of turbines within key 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. However, the ornithological assessment is materially flawed, containing significant gaps in evidence and internal inconsistencies that undermine its conclusions. It fails to demonstrate to the required evidential standard that these species will not be adversely affected.

The assessment does not sufficiently account for the importance of feeding grounds associated with protected sites such as the Lewis Peatlands and St Kilda. The reliance on modelling approaches introduces uncertainty, particularly for species in severe decline, like Kittiwakes and Fulmars. Furthermore, the methodologies applied are likely to underestimate mortality due to incomplete baseline data and a lack of understanding of behavioural responses.

A fundamental contradiction exists within the application; the developer concludes

that there are no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only needed when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and the support for the conclusions drawn.

The siting of turbines in a recognised migratory corridor introduces an additional significant risk, creating a barrier within a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not adequately assess the long-term implications of sustained mortality in this corridor or the potential impacts on species with small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold required to conclude no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and modelling limitations, means 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.

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

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

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 assessment of social impacts, health, and wellbeing related to the proposal is insufficient and lacks necessary transparency. While the developer conducted a Social Impact Assessment, including focus groups with local residents, the complete report has not been made public. This results in a significant evidential gap, hindering both public understanding and the competent authority's ability to evaluate the full extent of social risks identified by the developer's research.

Available summaries suggest that residents are already facing measurable stress, anxiety, and concern due to the proposal's scale and proximity. These impacts arise from direct engagement with the community and are not merely speculative. However, without disclosing the complete assessment, proper scrutiny of the findings is not possible, which limits the capacity to assess their significance in the decision-making process.

Moreover, there is evidence indicating that the proposal threatens community identity and cohesion, with “cultural loss” noted in the developer's findings. Unfortunately, these effects have not been fully considered in the main application or given the appropriate weight they deserve. The decision to withhold the full Social Impact

Assessment obscures the actual human and social costs associated with the development.

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

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4 concerning health and wellbeing. Developments should promote positive health outcomes and avoid causing harm, but the available evidence reveals adverse effects that have not been fully disclosed. Without the complete assessment, demonstrating compliance with this policy is impossible.

The implications of these procedural shortcomings are serious. The competent authority cannot conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This omission represents a material failure within the application and does not meet the evidential requirements set by the Environmental Impact Assessment regime.

In summary, the failure to disclose the full Social Impact Assessment, alongside evidence of existing adverse effects, renders the assessment inadequate and unreliable. This lack of comprehensive information hinders a lawful determination, reinforcing the conclusion that the application does not rest on sufficient evidence.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is inadequate and does not sufficiently capture the extent of change or the sensitivity of the environment involved. The character of the West Lewis coastline is shaped by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. The proposed large-scale turbines, positioned close to the shoreline, would establish an industrial presence that is continuous and dominant, fundamentally transforming this character and leading to a permanent and irreversible alteration of the landscape.

Moreover, the application fails to represent the scale of visual change accurately. The size and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, thereby directly impacting visual amenity and diminishing the essential qualities of naturalness and remoteness. This level of impact and its significance in the context of such a sensitive landscape has not been properly conveyed.

Concerns also arise regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that the viewpoints chosen may not adequately depict the most sensitive receptors or the worst-case scenarios, particularly concerning key

cultural heritage sites and valued landscapes. This deficiency introduces a risk that the magnitude of visual impact has been understated, thereby calling into question the reliability of the assessment.

Another significant shortcoming is the lack of evaluation of 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, linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these heritage assets as isolated, failing to acknowledge their interdependence, which results in an incomplete understanding of the impacts on their settings 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 constitutes a visual impact but also entails broader cultural and spatial harm that has not been adequately addressed in the application.

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

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 overwhelmingly dominant and unavoidable. Consequently, the resulting change is fundamental and permanent, incapable of being reduced to an acceptable level through mitigation.

In conclusion, the assessment inadequately represents the magnitude of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These deficiencies hinder a reliable evaluation and bolster the argument that the proposal is incompatible with the protection of this valuable landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment regarding construction and pollution risks is inadequate, lacking the necessary detail to evaluate the potential environmental effects associated with the proposal. This initiative entails significant seabed preparation and installation activities within a high-energy Atlantic environment, yet it does not present fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it leans on mitigation and contingency measures that would only be formulated after consent has been granted, thereby obstructing any meaningful assessment of their adequacy or effectiveness.

This reliance on unspecified future measures raises serious concerns, particularly considering the sensitivity of the receiving environment. The coastline of West Lewis 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 potential chemical or oil spills, it fails to provide adequate details on 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. In the absence of robust modelling and well-defined management strategies, determining the extent, duration, or ecological consequences of these impacts is unfeasible. This uncertainty also applies to potential effects on marine species and habitats already identified as sensitive within the broader assessment.

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

From a regulatory standpoint, deferring critical environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. Significant likely effects and mitigation strategies must be evaluated prior to granting consent, and without this information, a lawful determination cannot be achieved. The application also fails to illustrate compliance with policy requirements regarding environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The proposal's assessment of marine life and fisheries is inadequate, failing to provide a thorough evaluation of both ecological and socio-economic effects. The coastal waters of West Lewis are home to a rich marine ecosystem and an active fishing industry, yet the application does not sufficiently demonstrate that these habitats and uses can be protected or sustained without major disruption.

One of the critical concerns is the assumption that fishing activities can be displaced without significant repercussions. The application lacks evidence that there are alternative fishing grounds which are accessible and can handle additional fishing pressure. This gap is particularly important, as the potential for displacement could lead to overfishing in other areas, with broader economic implications for the local fishing fleet. Without a comprehensive and evidence-based analysis, the impacts on fisheries and the livelihoods that depend on them remain unclear.

Furthermore, the proposal poses considerable risks to marine species, especially due to the underwater noise generated during construction. The use of high-energy hammer piling over extended periods is expected to cause disturbances across large distances, impacting species such as dolphins. The anticipated disturbance to a substantial portion of the local bottlenose dolphin population raises significant concerns; however, the application downplays these effects without providing adequate supporting evidence.

There exists an apparent contradiction within the application, where the necessity for licenses to allow harm to European Protected Species is acknowledged, yet the impacts are simultaneously characterised as negligible. This inconsistency undermines the credibility of the assessment and raises serious questions regarding compliance with the Habitats Regulations, particularly when harm is expected to a degree that necessitates legal approval.

Moreover, the assessment neglects to address 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 to determine the overall impact on marine ecosystems and socio-economic conditions.

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

In summary, the deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions render the assessment both incomplete and unreliable. These shortcomings hinder a robust evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is fundamentally incomplete, failing to recognise the full extent of impacts associated with what constitutes a single integrated project. The connection between the offshore turbines and onshore works is inherent, yet they are analysed separately, leading to a disjointed evaluation that conceals the real scale of environmental and socio-economic consequences.

Key onshore elements involve cabling that crosses protected moorland, the construction of a substation in proximity to Stornoway, and the associated infrastructure necessary for access through sensitive landscapes. These activities necessitate excavation in areas of deep peat, notably within Barvas Moor, an important carbon store and ecologically valuable habitat. The application lacks a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By omitting or postponing the evaluation of onshore impacts, the application obstructs a proper assessment of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered in unison; however, the division of offshore and onshore elements obscures the comprehensive impacts on peatlands, habitats, and local communities.

There exist significant risks to sensitive habitats, including machair systems and peatland environments, which are protected by policy. The application does not show that the impacts on these habitats have been thoroughly evaluated or that adequate avoidance measures have been implemented, resulting in a marked evidential gap concerning biodiversity protection.

Concerns are also raised regarding carbon balance. Disturbing peatland releases stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy initiatives. The application fails to adequately tackle this concern or illustrate that the overall carbon balance is advantageous.

Additionally, routing infrastructure through active croft land presents potential conflicts with existing land use and legal rights. The application does not provide proof that the requisite consents or processes have commenced, thus casting doubt on deliverability and lawful execution.

From a policy standpoint, the inability to assess the project comprehensively and to demonstrate the protection of peatlands, habitats, and land use interests stands in conflict with the National Marine Plan and National Planning Framework 4. The failure 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 regarding environmental and land use impacts render this segment of the application incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The omission of an assessment concerning dark skies and nocturnal wildlife within the Environmental Impact Assessment is a significant oversight. The West Lewis coastline is distinguished by its exceptionally dark skies, which are integral to environmental quality, cultural identity, and the tourism sector. The proposal includes the installation of permanent red aviation lighting that would be visible over considerable distances, resulting in a continuous and intrusive “wall of light” across the western horizon, thereby fundamentally altering the night-time environment.

Furthermore, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of residents and visitors. This gap is particularly notable given the critical role dark skies play in the area's identity and in emerging sectors such as astro-tourism. The lack of consideration for these impacts reveals a clear deficiency in the landscape and environmental evaluation.

Equally concerning is the absence of an assessment regarding the effects on nocturnal wildlife. Species including the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting, which can cause disorientation and an increased risk of collision. The application does not provide any analysis of the lighting's impact or a study on phototaxis, failing to assess how aviation lighting might affect these species and potentially elevate mortality rates.

This issue is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not take into account nocturnal activity or associated risks. Additionally, species such as Kittiwakes, which may forage or migrate at night, are at risk of disorientation due to artificial lighting; yet, this risk remains unassessed. The lack of site-specific night-time data represents a critical void in understanding the ecological impacts.

In the absence of a nocturnal impact assessment, 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 satisfied, thus invoking the precautionary principle and obstructing a lawful determination.

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

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

TOURISM

The evaluation of tourism impacts within the application is severely lacking and does not adequately assess the economic and social repercussions 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 the sense of remoteness they provide. While the application notes that 86% of visitors are attracted by the scenery, it fails to deliver a quantified analysis of how large-scale offshore infrastructure could influence visitor numbers, behaviour, or the overall economic contribution of tourism.

The tourism sector has experienced considerable growth, with revenue rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and comprising up to 16% of the island's economy. Nonetheless, the proposal does not consider how the industrialisation of the seascape and degradation of environmental quality may affect Tourism Gross Value Added or the broader economic resilience of the area.

Without such modelling, it is impossible to ascertain whether the development would provide a net economic benefit or adversely impact a well-established and expanding sector.

Furthermore, the assessment neglects to examine the significance of environmental quality for tourism, particularly regarding the value of unspoiled landscapes and dark skies to the visitor experience. This is especially relevant for growing sectors such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, resulting in a considerable shortfall in understanding the implications for an acknowledged and emerging facet of the local economy.

Considering that the island community possesses limited economic diversity, the oversight in assessing tourism impacts carries broader consequences 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 properly evaluated as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly regarding economic impact and the necessity to illustrate net benefit. It also contradicts strategic objectives that highlight tourism as a priority growth sector and fails to present sufficient evidence for the competent authority to analyse the economic ramifications of the proposal.

In summary, the collective shortcomings in quantifying tourism impacts, evaluating environmental factors influencing visitor behaviour, and acknowledging the island's economic dependency create a significant evidential gap. This inhibits a comprehensive assessment of economic effects and leads to the conclusion that the application remains incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the standards of sustainable development as required by statutory duties, national policy, and evidential standards. This application 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. It is presented now under a supposedly stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are substantial deficiencies in the evidential basis for this proposal. Critical gaps in baseline data exist, along with the use of an undefined design envelope. The reliance on unspecified mitigation measures is troubling, and significant impact pathways, such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism effects, have been omitted. Consequently, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of likely significant effects and residual impacts.

Procedural failures are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory duty under the Islands (Scotland) Act 2018, while the non-disclosure of the full Social Impact Assessment constitutes a significant omission. These shortcomings impede the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

In addition, the proposal contradicts the National Planning Framework 4, failing to demonstrate the protection of biodiversity, natural places, and cultural heritage. It does not adequately show that health and wellbeing impacts are acceptable nor does it provide evidence of a net economic benefit, lacking tourism impact modelling. The cumulative impacts of both offshore and onshore elements have not been properly assessed, which obscures 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 inconsistent in certain areas. The evidential threshold required to exclude adverse effects beyond reasonable scientific doubt has not been achieved, necessitating the application of the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

When considering these points, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, alongside policy conflicts and unresolved environmental risks, preclude a lawful and evidence-based decision. The competent authority must refuse consent based on these grounds or invoke the relevant regulatory provisions to require the submission of the missing information.

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

Additional Comments

This is a plan to destroy my home to fill the pockets of people who never planned to live here. How anyone can let this go ahead is beyond me. There’s more to this world than money and the sooner these people see that the better for everyone who shares this planet.

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: 3D726E79

Member of the public 1122

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

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and transparency regarding the environmental effects of the proposal. The use of a flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations for turbines, introduces considerable uncertainty. This uncertainty hampers the assessment's integrity, making it difficult for both the public and competent authority to grasp the full extent of the environmental impacts.

The application depends heavily on mitigation measures, monitoring strategies, and management plans that are not yet defined. Consent is requested on the premise that any environmental harm will be managed later, hindering a meaningful evaluation of the effectiveness of these measures and the assessment of residual impacts. This postponement of crucial information to post-consent stages is procedurally unacceptable and goes against the intent of the Environmental Impact Assessment regime, which necessitates that significant effects and mitigation are clearly established prior to decision-making.

There are also significant gaps in baseline data, limitations in the methodology, and reliance on assumptions instead of site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, particularly where negligible or non-significant effects are concluded without adequate supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts and introduces a level of scientific uncertainty that cannot align with statutory requirements.

As a result, the application does not meet the evidential standard required under the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate adherence to National Planning Framework 4, particularly in relation to biodiversity protection and environmental integrity, as it has not been shown that impacts have been thoroughly assessed or that suitable safeguards are in place.

In summary, the combination of an undefined design envelope, lack of specified mitigation, and gaps in baseline data makes the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings prevent a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make an informed decision based on the provided information.

ASSESSMENT OF ALTERNATIVES

The proposed application does not adequately assess alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of providing a structured comparison of realistic alternatives based on their environmental effects, the application offers a narrative of project development. This method does not adequately show that less harmful options have been properly identified and assessed in preference to more damaging solutions.

There is a lack of transparent and evidence-based comparisons of offshore locations, development scales, and design configurations. Notably, the application does not indicate that the developer has seriously considered placing turbines further offshore, which could potentially reduce visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline and the significant role that proximity to shore plays in determining impact, the failure to conduct such an analysis prevents any conclusion that the proposed siting is the least damaging option available.

The shortcomings also apply to the assessment of cable routing and landfall, where there is insufficient evidence indicating that alternative routes have been properly examined to avoid or minimise impacts on sensitive receptors. This includes important cultural and spiritual sites such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis shows that there has been no application of mitigation by design, relying instead on post-design mitigation measures.

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

From a policy standpoint, this inadequacy jeopardises 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 leads to the conclusion that the application has not been sufficiently evaluated and cannot support a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development has not adequately addressed the cultural heritage and community identity associated with the West Lewis coastline, which serves as a living cultural landscape where environment, language, tradition, and community are deeply interconnected. The assessment reduces heritage to isolated, static assets and fails to recognise their ongoing social, cultural, and spiritual significance within the community.

A notable shortcoming is the treatment of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active burial sites and places for spiritual practice; however, they are mischaracterised as static features in the assessment. This oversight neglects their continued use and meaning, as well as the potential impacts of development on their setting, leading to an incomplete evaluation of cultural effects and overlooking their importance in community life.

Moreover, the assessment does not consider intangible cultural heritage, such as the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These elements are vital to the area's identity

but are entirely omitted from the evaluation, creating a significant gap in understanding the cultural implications of the development.

There are additional concerns related to community rights and engagement. The Gaelic-speaking population holds a unique cultural identity that aligns with characteristics of an Indigenous People. Nevertheless, there has been no process of Free, Prior and Informed Consent, which undermines the credibility of the assessment and fails to adhere to established principles of participation in decisions impacting cultural and environmental interests.

A critical procedural oversight 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 that the competent authority cannot legally fulfil its duty to evaluate the social, cultural, and economic effects on the island community, preventing a lawful determination of the proposal.

From a policy standpoint, these deficiencies place the application 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 and the failure to recognise living cultural practices represent a clear violation of policy requirements.

Overall, the failure to evaluate living heritage, intangible cultural value, community rights, and compliance with statutory obligations leads to a significant evidential gap. The cultural impacts of the development have not been adequately assessed, leaving the application without a sufficient basis to evaluate the true cultural cost of 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 assessment regarding construction and pollution risks is lacking in completeness and fails to provide the necessary detail to evaluate potential environmental effects adequately. The proposal entails extensive seabed preparation and installation operations within a high-energy Atlantic setting, yet it lacks 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, which hinders any thorough evaluation of their sufficiency or effectiveness.

This dependence on unspecified future actions raises significant concerns, particularly given the delicate nature of the receiving environment. The West Lewis coastline is

home to clean coastal waters and critical habitats that are susceptible to disturbances from sediment and contamination. Although the application does acknowledge risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it falls short in detailing how these risks will be prevented, managed, or monitored.

There is also ambiguity regarding the scale and behaviour of sediment plumes that may result from seabed disturbances and cable installations. In the absence of reliable modelling and clearly defined management approaches, it remains impossible to ascertain the extent, duration, or ecological repercussions of these impacts. This uncertainty also extends to potential effects on 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 until after consent is granted, the application obstructs the evaluation of whether suitable safeguards are in place to address pollution incidents. This creates procedural risks and diminishes the ability of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory viewpoint, the postponement of essential environmental safeguards is at odds with the stipulations of the Environmental Impact Assessment framework. Significant effects and mitigation must be evaluated before consent is issued, and without this critical information, a lawful determination cannot occur. Furthermore, the application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the deficiencies in defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts collectively render the assessment materially inadequate. These weaknesses obstruct a thorough evaluation of construction and pollution risks, further reinforcing the conclusion that the application is incomplete.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

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

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

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

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

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

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development when evaluated against statutory obligations, national policy, and evidential standards. The application mirrors the main concerns that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Despite being presented under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, it does not sufficiently address these critical issues.

There are significant gaps in the baseline data provided, and the application relies on an undefined design envelope. Furthermore, it depends on unspecified mitigation

measures and fails to include essential impact pathways, such as those affecting nocturnal wildlife, the complete onshore infrastructure, and tourism consequences. Consequently, the Environmental Impact Assessment is lacking, which hinders a full understanding of potential significant effects or residual impacts.

Procedural shortcomings are also evident, particularly with the absence of a compliant Island Communities Impact Assessment, which breaches statutory requirements under the Islands (Scotland) Act 2018. Additionally, the failure to present a complete Social Impact Assessment is a substantial omission. These shortcomings hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal contradicts National Planning Framework 4 as it does not demonstrate sufficient protection for 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, especially due to the absence of tourism impact modelling. 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.

The environmental risks associated with the proposal remain uncertain and potentially severe. Assessments pertaining to marine ecology, seabirds, protected species, and marine mammals are incomplete and occasionally inconsistent. The evidence required to demonstrate the absence of adverse effects beyond reasonable scientific doubt has not been achieved, thus invoking the precautionary principle and preventing a lawful determination of acceptable impacts.

Moreover, the proposal would lead to significant and irreversible alterations to a landscape that is highly sensitive. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruptions to 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 scale of deficiencies in information, alongside conflicts with policy and unresolved environmental risks, obstructs a lawful and evidence-based decision. It is imperative that the competent authority either denies consent based on these grounds or invokes the relevant regulatory provisions to require 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.

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: D932894A

Member of the public 1123

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. A thorough review of the Environmental Impact Assessment Report and associated documentation reveals several material deficiencies concerning planning, environmental impacts, cultural considerations, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and a strong sense of cultural identity. Concerns arise from the proposal's scale, proximity, and design, which fundamentally question its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks an adequate evidential basis necessary for a lawful determination. There is a notable absence of critical environmental data, limited and inconsistent baseline information, and key elements of the proposal remain undefined. Furthermore, the flexible design framework employed hinders a clear understanding of potential significant effects, and reliance on unspecified mitigation measures means that their effectiveness cannot be properly evaluated. Consequently, the documentation fails to facilitate a full or informed understanding of environmental, cultural, or community impacts, and claims regarding negligible or non-significant effects lack robust supporting evidence.

Substantive policy conflicts are evident throughout the proposal. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These conflicts directly impact the statutory tests necessary for consent and weaken the ability of the competent authority to determine the proposal's acceptability in policy terms.

The unprecedented scale of the proposal, with large turbines positioned close to the shoreline, raises significant concerns about landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, dependence on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance illustrates that the application is incomplete and unable to support a lawful determination. Under these circumstances, the precautionary principle must be applied.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed development presents significant concerns regarding its impact on marine ecology and protected species. The assessment conducted does not provide a complete or reliable understanding of the ecological receptors within the West Lewis coastal environment, which is a highly sensitive and biologically active marine system. Incomplete baseline data and inadequate methodologies have failed to capture vital information regarding species presence, behaviour, and habitat use. Consequently, this assessment lacks a sound evidential basis for evaluating potential impacts.

Particularly concerning is the omission of otters, 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. Such deficiencies undermine any conclusions regarding the absence of significant effects on the species.

Similarly, the assessment of basking sharks suffers from reliance on aerial surveys, which introduce significant detection bias in Atlantic conditions. This methodology is likely to underestimate their presence, especially when compared with established land-based observations that indicate frequent use of these waters. The failure to incorporate or properly consider these data leads to an incomplete baseline and further weakens the reliability of the conclusions drawn.

These methodological flaws result in conclusions regarding negligible or non-significant effects being based on assumptions rather than robust evidence. The absence of sufficient baseline data also obstructs meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises serious questions about the true scale of risk to marine species and habitats.

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

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These shortcomings hinder a robust evaluation of impacts on marine ecology and protected species and lead to the conclusion that the application is lacking a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents a fundamentally unreliable ornithological assessment, marked by significant gaps in evidence and contradictions that call its conclusions into question. It is situated within key foraging areas and migratory pathways on the west coast of the Isle of Lewis, where internationally important seabird populations, already

in decline, reside. Despite this, the assessment fails to demonstrate convincingly that these species will not suffer adverse effects. The implications of displacement, collision risk, or habitat loss have not been adequately evaluated.

There is a crucial inconsistency within the application itself. While the developer concludes that there are no significant adverse effects, they simultaneously propose a Habitats Regulations derogation case, which only arises when significant harm is anticipated. This contradiction further undermines the reliability of the assessment and indicates that the conclusions drawn lack support from the underlying evidence.

Moreover, the assessment does not adequately substantiate that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds has not been fully considered, and the reliance on modelling methodologies introduces substantial uncertainty, particularly concerning species in severe decline like Kittiwakes and Fulmars. It is likely that mortality rates are underestimated due to incomplete baseline data and an insufficient understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor poses an additional significant risk, effectively creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term effects of sustained mortality within this corridor are not adequately assessed, raising concerns for species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to ascertain no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This situation invokes the precautionary principle and precludes a lawful conclusion in support of consent.

Additionally, the identified deficiencies contravene National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected creates a direct conflict with national policy.

In summary, the assessment is rendered unreliable by internal inconsistencies, methodological weaknesses, and a lack of sufficient evidence. These deficiencies hinder a robust evaluation of potential impacts and support the conclusion that the application fails to meet the statutory requirements necessary for determination.

FISHERIES AND MARINE LIFE

The proposal presents significant risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over an extended period is likely to cause disturbances across large distances, which could adversely affect species such as dolphins. The potential impact on a significant

proportion of the local bottlenose dolphin population is concerning; however, the application underplays the importance of these effects without adequate supporting evidence.

Furthermore, the assessment of fisheries and marine life fails to provide a thorough evaluation of the ecological and socio-economic impacts involved. The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry, yet the application does not convincingly demonstrate how these habitats and uses can be protected or maintained without considerable disruption.

A critical flaw in the application is the assumption that fishing activity can be relocated without repercussions. There is no evidence provided to indicate that alternative fishing grounds are available, accessible, or able to support the additional pressure that may arise from displacement. This oversight is crucial, as such displacement poses risks of overfishing in other areas and could have broader economic implications for the local fishing fleet. Without a well-founded assessment, the impacts on fisheries and local livelihoods remain inadequately understood.

Inconsistencies within the application further raise concerns, particularly regarding the need for licences to permit harm to European Protected Species, which are acknowledged while simultaneously described as having negligible impacts. This contradiction undermines the credibility of the assessment and raises significant issues related to compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

The assessment also neglects to take into account the cumulative impacts from multiple pressures, such as habitat disturbance, noise, and the displacement of fishing activity. 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 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 obstructs any conclusion that the proposal signifies sustainable development.

Ultimately, the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and internal inconsistencies compromise the reliability and completeness of the assessment. These deficiencies hinder a robust evaluation of the impacts on marine life and fisheries.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are integral to the region's environmental quality, cultural identity, and tourism potential. The proposal introduces permanent red aviation lighting that would be visible across long distances, resulting in a continuous and intrusive effect on the western horizon,

fundamentally altering the night-time environment.

The Environmental Impact Assessment fails to evaluate the consequences of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This oversight is particularly significant due to the importance of dark skies to the area's identity and the growing tourism sector, including astro-tourism. The lack of consideration for these impacts creates a clear deficiency in the overall landscape and environmental assessment.

Moreover, there is no analysis of the effects of artificial lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to such lighting, which can lead to disorientation and an increased risk of collision. The application does not include any impact assessment regarding this lighting or a phototaxis study, thus failing to evaluate the potential effects on these species or the risk of increased mortality.

Additionally, the reliance on daytime survey data in the ornithological assessment fails to capture the nocturnal activities or associated risks. Species like Kittiwakes, which might forage or migrate during the night, are also vulnerable to disorientation from artificial lighting, yet this risk has not been evaluated. The absence of specific night-time data creates a critical gap in understanding the ecological impacts.

Without an assessment of nocturnal effects, it remains uncertain whether protected species or designated sites would face adverse impacts. The necessary evidential standard to exclude adverse effects beyond reasonable scientific doubt is not achieved, which engages the precautionary principle and obstructs lawful determination.

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

In summary, the lack of any assessment regarding 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 economic impacts related to tourism is significantly lacking, failing to address the economic and social ramifications for a vital sector of the Isle of Lewis economy. With tourism reliant on the area's scenic coastline, largely untouched landscapes, dark skies, and perception of remoteness, the application recognises that 86% of visitors are attracted by the scenery. However, it does not provide a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers,

behaviours, or the overall economic contribution of this sector.

Tourism has experienced notable growth, rising from £65 million in 2017 to over £81.5 million, generating more than 1,000 jobs and comprising up to 16% of the island's economy. Despite this growth, the application neglects to model the potential impacts of seascape industrialisation and declining environmental quality on Tourism Gross Value Added or the broader economic resilience. Without such analysis, it remains unclear whether the proposed development would offer a net economic benefit or pose a threat to an established and expanding sector.

Furthermore, the assessment overlooks the significance of environmental quality in sustaining tourism, particularly the value of unspoiled landscapes and dark skies to visitor experiences, as well as their relevance to emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, creating a substantial void in understanding the effects on a recognised and expanding part of the local economy.

In an island community with limited economic diversification, the failure to evaluate tourism impacts has broader implications for employment, local enterprises, and community sustainability. The absence of an adequate Island Communities Impact Assessment signifies that these economic vulnerabilities have not been duly considered 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 contradicts strategic objectives that prioritise tourism as a growth sector and lacks sufficient evidence to enable the competent authority to appraise the economic consequences of the proposal.

Collectively, the failure to quantify tourism impacts, assess environmental factors influencing visitor behaviour, and acknowledge the economic dependence of the island culminates in a significant evidential gap. This inadequacy 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 demonstrates significant shortcomings in meeting the principles of sustainable development as outlined by statutory duties and national policy. This application mirrors the key concerns that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. It is now being put forward under a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

A reliable evidential foundation for this application is notably absent. There are serious deficiencies in baseline data, the use of an undefined design envelope, unspecified

mitigation measures, and the exclusion of critical impact pathways. These include nocturnal wildlife, comprehensive onshore infrastructure, and the implications for tourism. Consequently, the Environmental Impact Assessment is inadequate and fails to provide a full understanding of potential significant effects or residual impacts.

Procedural inadequacies are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the failure to share the complete Social Impact Assessment is a material omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Moreover, the proposal contradicts the National Planning Framework 4. It does not adequately protect biodiversity, natural landscapes, or cultural heritage, fails to demonstrate that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit, particularly due to the absence of tourism impact modelling. The overall assessment of cumulative impacts from both offshore and onshore elements is insufficient, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

The environmental risks associated with this proposal remain uncertain and potentially severe. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and exhibit inconsistencies. The requisite evidential standard needed to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and precluding a lawful conclusion regarding acceptable impacts.

The proposed development would lead to considerable and irreversible alterations to a sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual connections, and the adverse effects on tourism constitute permanent impacts that cannot be mitigated to an acceptable degree.

In light of these factors, the application is fundamentally and procedurally unsuitable for determination. The vast information gaps, along with policy inconsistencies and unresolved environmental risks, obstruct a lawful and evidence-based decision. The competent authority should therefore refuse consent on these bases or invoke relevant regulatory provisions to necessitate the submission of the missing information.

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

Additional Comments

I'm am extremely saddened that the Government has plough ahead for its aim.of net zero without consideration of the impact on the landscape and the seabirds / other ocean creatures that make their homes around Scotland. We are so lucky to have these

on our doorstep and yet appear to be the generation that doesn't care and will lead to the extinction of these creatures. So called green energy should not come at a cost to other living creatures / human impact and with the loss of these creatures the loss of accompanying tourism. It needs to be re- thought.

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: CA2BBD62

Member of the public 1124

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 marine licensing and Environmental Impact Assessment regimes. An analysis of the Environmental Impact Assessment Report and accompanying documents has revealed significant deficiencies related to planning, environmental considerations, cultural aspects, and procedural adherence. The proposed development is situated off the west coast of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, largely untouched environment, and robust cultural identity. The proposal's scale, design, and proximity to the shoreline raise serious questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks an adequate evidential foundation necessary for a lawful decision. There are substantial gaps in critical environmental data, and the available baseline information is both limited and inconsistent. Additionally, several key components of the proposal remain undefined. The employment of a flexible design framework hinders a comprehensive understanding of the potential significant effects, and the reliance on unspecified mitigation measures means their effectiveness cannot be evaluated. Consequently, the provided documentation fails to facilitate a complete understanding of the environmental, cultural, or community impacts, while claims of negligible or non-significant effects are not substantiated by robust evidence.

Substantial policy conflicts are evident in this case. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not adequately demonstrate adherence to national obligations for the protection of biodiversity, climate interests, and environmental integrity. These conflicts directly challenge the statutory tests necessary for granting consent and hinder the competent authority's ability to ascertain the development's acceptability from a policy perspective.

The unprecedented scale of the proposal, characterised by large turbines situated near the shoreline, introduces considerable concerns regarding landscape capacity, visual dominance, and environmental impact. Collectively, the lack of sufficient information, dependence on undefined mitigation, evidential shortcomings, and clear non-compliance with policy illustrate that the application is incomplete and unable to support a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

MARINE ECOLOGY AND PROTECTED SPECIES

The coastal environment of West Lewis is a biologically active marine system that requires thorough ecological assessment. However, the assessment of marine ecology and protected species presented in the application is significantly lacking. It fails to provide a reliable understanding of ecological receptors in this sensitive area due to incomplete baseline data and methodologies that do not adequately capture the presence, behaviour, and habitat use of various species. Consequently, this deficiency compromises the evaluation of potential impacts on the ecosystem.

Specifically, otters, classified as a European Protected Species, have not been properly recognised within the assessment. The application overlooks their active use of coastal regions for foraging and movement, leading to an inadequate analysis of how construction disturbance, noise, and increased activity could affect these animals. This failure to assess their core foraging range and behavioural patterns casts doubt on the conclusions regarding the absence of significant effects on otters.

Additionally, the assessment of basking sharks suffers from methodological flaws. It relies heavily on aerial surveys, which introduce a notable detection bias, particularly under Atlantic conditions. This reliance risks underestimating the presence of basking sharks, especially when compared to established land-based observations that demonstrate frequent use of these waters. Neglecting to incorporate or adequately consider such data results in an incomplete baseline, which further undermines the reliability of the conclusions drawn.

Due to these methodological limitations, the assessment's findings of negligible or non-significant effects are based more on assumptions than on solid evidence. The lack of comprehensive baseline data hinders any meaningful assessment of cumulative and indirect impacts, including those related to seasonal variations and broader ecosystem interactions. This raises uncertainties about the actual risks facing 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 has failed to identify or assess protected species appropriately. This uncertainty prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Given these circumstances, it follows that consent cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions results in an unreliable assessment. These deficiencies obstruct a comprehensive evaluation of impacts on marine ecology and protected species and highlight the overarching issue that the application lacks a sufficient 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 assessment of cultural heritage and community identity is seriously lacking. It does not acknowledge the West Lewis coastline as a living cultural landscape where environment, language, tradition, and community are closely interconnected. Instead, the application simplifies heritage, viewing it as a collection of isolated, unchanging assets. This perspective ignores the ongoing social, cultural, and spiritual functions these elements have within the community.

A significant shortcoming is the handling of culturally significant sites like the cemeteries at Dalmore, Bragar, and Barvas. These places are active sites of burial and spiritual practice; however, the assessment wrongly categorises them as static features. It fails to take into account their continued use and the impact of development on their surroundings. Such mischaracterisation leads to an incomplete understanding of cultural effects and neglects their importance to community life.

Moreover, intangible cultural heritage is overlooked. Elements such as the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment are vital to the area's identity yet are entirely absent from the assessment. This gap means the cultural impact of the proposed development cannot be fully understood.

Community rights and engagement also raise concerns. The Gaelic-speaking population embodies a distinct cultural identity with characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the assessment's validity and disregards established principles of participation in decisions affecting cultural and environmental interests.

Furthermore, there is a critical procedural failure, as a compliant Island Communities Impact Assessment, mandated by the Islands (Scotland) Act 2018, has not been conducted. Without this assessment, the competent authority cannot legally evaluate the social, cultural, and economic impacts on the island community. This omission alone renders any determination of the proposal unlawful.

From a policy standpoint, these failures conflict with National Planning Framework 4, particularly regarding the protection of historic assets and places. The neglect to consider both tangible and intangible heritage and to recognise living cultural practices marks a clear deviation from policy requirements.

When viewed collectively, the shortcomings in assessing living heritage, intangible cultural value, community rights, and statutory obligations create a substantial evidential gap. The cultural impacts of the development remain unassessed, and the application does not offer a solid foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal has raised considerable concerns regarding community identity and cohesion, with findings from the developer indicating a potential “cultural loss.” Despite this acknowledgement, these impacts have not been adequately incorporated into the main application or sufficiently weighted in the assessment process. This omission highlights a significant evidential gap, as the full Social Impact Assessment has not been published. Consequently, both the public and the competent authority are unable to grasp the full extent of the social risks identified by the developer’s own research.

Residents are already reporting measurable levels of stress, anxiety, and concern resulting from the scale and proximity of the proposed development. These impacts stem from direct engagement and should not be regarded as speculative. However, the lack of disclosure surrounding the full assessment limits the capacity for thorough scrutiny of the findings and hinders the determination of their relevance within the decision-making framework.

Furthermore, this lack of transparency compromises the Environmental Impact Assessment process, as a complete understanding of social, economic, and health impacts is crucial for developments of such magnitude. The application fails to present a comprehensive evidential basis for weighing the balance between benefits and harm due to the absence of the complete dataset.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Developments are expected to promote positive health outcomes and mitigate harm, yet the available evidence suggests existing adverse effects have not been fully disclosed. Without access to the full Social Impact Assessment, it cannot be substantiated that the application aligns with this policy.

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

In conclusion, the non-disclosure of the full Social Impact Assessment, alongside evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This deficiency obstructs a lawful determination and underscores the inadequacy of the information supporting the application.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

consent, which obstructs any meaningful evaluation of their adequacy or effectiveness.

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

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

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

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

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the application lacks a thorough evaluation of ecological and socio-economic impacts, raising significant concerns about the potential disruption to these vital resources. A critical issue lies in the assumption that fishing activity can be displaced without consequence, yet there is no evidence provided that alternative fishing grounds are available or capable of supporting the additional pressure this displacement would create. This omission is alarming, as it risks overfishing in other areas and could have broader economic ramifications for the local fishing fleet. Without a detailed assessment grounded in evidence, the

implications for fisheries and local livelihoods remain obscure.

Additionally, the proposal poses considerable risks to marine species, notably due to underwater noise generated during construction. The high-energy hammer piling expected to occur over an extended period is likely to cause disturbances across vast distances, potentially affecting species such as dolphins. The anticipated disruption to a significant portion of the local bottlenose dolphin population raises profound concerns; yet, the application tends to diminish the importance of these effects without adequate supporting evidence.

There exists a troubling inconsistency within the application. While it acknowledges the necessity of licences to permit harm to European Protected Species, it simultaneously characterises the impacts as negligible. This contradiction undermines the credibility of the assessment and prompts concerns regarding adherence to the Habitats Regulations, especially where anticipated harm would necessitate legal authorisation.

Furthermore, the assessment fails to account for cumulative impacts that arise from various pressures, including habitat disturbance, noise, and the displacement of fishing activity. Without an in-depth evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions cannot be accurately gauged.

From a policy standpoint, the application does not demonstrate alignment with the National Planning Framework 4 or the National Marine Plan. It does not sufficiently show that the development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity, obstructing any conclusion that the proposal embodies sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is materially incomplete, failing to account for the full extent of impacts stemming from this single integrated project. The intrinsic link between the offshore turbines and the onshore works is overlooked, leading to a fragmented analysis that obscures the true scale of environmental and socio-economic effects.

Onshore elements encompass cabling across protected moorland, the construction of a substation near Stornoway, and associated access infrastructure traversing sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, thus preventing a complete understanding of the project's overall environmental footprint.

The failure to address or defer the assessment of onshore impacts impedes a proper evaluation of cumulative effects. According to the Environmental Impact Assessment process, all components of a project must be considered collectively; however, the separation of offshore and onshore elements results in a lack of clarity regarding their combined impacts on peatlands, habitats, and communities.

Sensitive habitats, including machair systems and peatland environments that are under policy protection, face significant risks. The application does not provide evidence that impacts on these habitats have been fully assessed or that appropriate avoidance measures have been implemented, highlighting a clear evidential gap concerning biodiversity protection.

Concerns regarding carbon balance also arise from the proposal. Disturbance of peatland leads to the release of stored carbon, which may create a carbon debt that contradicts the goals of renewable energy development. The application falls short of adequately addressing this issue or demonstrating that the overall carbon balance remains beneficial.

Furthermore, the routing of infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. The application does not evidence that the necessary consents or processes have been initiated, raising doubts about deliverability and lawful implementation.

From a policy standpoint, the failure to consider the project as a whole and demonstrate protection of peatlands, habitats, and land use interests conflicts with the National Marine Plan and National Planning Framework 4. The lack of proof 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 segment of the application incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment notably fails to address the crucial elements of dark skies and nocturnal wildlife. The West Lewis coastline is distinguished by its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism potential. The proposal introduces permanent red aviation lighting that would be visible over long distances, resulting in an intrusive “wall of light” effect along the western horizon, thereby fundamentally changing the night-time environment.

The application neglects to evaluate how this lighting would impact visual amenity, landscape character, or the experiences of both residents and visitors. This is particularly significant considering the importance of dark skies to local identity and to

emerging sectors like astro-tourism. Consequently, there is a clear gap in the overall landscape and environmental assessment.

More alarmingly, the proposal does not assess the impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly susceptible to artificial lighting due to phototaxis, which can cause disorientation and increase collision risks. The absence of any lighting impact assessment or phototaxis study means that potential effects of aviation lighting on these species and the associated risk of increased mortality have not been considered.

This shortcoming is further exacerbated by the use of 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 risk has gone unassessed. The lack of site-specific night-time data creates a significant gap in understanding the ecological impacts of the proposal.

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

From a policy viewpoint, this omission contradicts the National Planning Framework 4 concerning the protection of natural environments and quality. Moreover, it undermines the comprehensive assessment of landscape and seascape impacts, as the character of night-time environments is an integral aspect of the ecological setting.

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

TOURISM

The application presents significant deficiencies in its assessment of tourism impacts, neglecting to evaluate both the economic and social consequences for a crucial sector of the Isle of Lewis economy. It is vital to recognise that tourism relies heavily on the region's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness. Although the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide a quantified assessment of how the proposed large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution from tourism.

Tourism on the Isle of Lewis has experienced substantial growth, with its value 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. Despite this positive trend,

the application does not adequately model the potential impact of industrialising the seascape or the loss of environmental quality on Tourism Gross Value Added and overall economic resilience. Without this crucial analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or jeopardise an established and burgeoning sector.

Furthermore, the assessment overlooks the critical role that environmental quality plays in bolstering tourism. It fails to consider the significance of unspoiled landscapes and dark skies for the visitor experience, particularly for emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this inadequacy, leaving a considerable gap in understanding the impact on a recognised and expanding segment of the local economy.

Given the limited economic diversification within the island community, the neglect of tourism impact assessments 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 evaluated as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application fails to demonstrate alignment with the National Planning Framework 4, especially concerning economic impact and the necessity to show net benefits. It contradicts strategic objectives that designate tourism as a priority growth sector and does not furnish adequate evidence for the competent authority to evaluate the economic repercussions of the proposal.

In summary, the deficiencies in quantifying tourism impacts, assessing environmental factors that influence visitor behaviour, and considering the island's economic dependency result in a significant evidential gap. This lack of thorough analysis obstructs a comprehensive 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 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.

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: 9ED017EB

Member of the public 1125

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 in accordance with the relevant marine licensing and Environmental Impact Assessment frameworks. A thorough review of the Environmental Impact Assessment Report and the associated documentation reveals significant deficiencies in planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, a near-pristine environment, and a strong cultural identity.

The application lacks an adequate evidential basis for a lawful determination. It is notable that critical environmental data is absent, baseline information is inconsistent and limited, and essential elements of the proposal remain undefined. The application's flexible design framework obstructs a clear understanding of potential significant effects, while the reliance on unspecified mitigation measures means that their efficacy cannot be evaluated. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, with claims of negligible or non-significant effects not backed by robust evidence.

There are clear and significant conflicts with policy. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements designed to protect biodiversity, climate interests, and environmental integrity. Such conflicts directly impact the statutory tests necessary for consent, ultimately undermining the ability of the competent authority to deem the development acceptable from a policy standpoint.

The scale of the proposed development is unprecedented for this area, with large turbines situated in close proximity to the shoreline, raising considerable concerns about landscape capacity, visual dominance, and environmental impact. When considering the lack of sufficient information, the reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance, it is evident that the application is incomplete and incapable of supporting a lawful determination. In light of these issues, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The proposed development is accompanied by an Environmental Impact Assessment Report that is fundamentally lacking, failing to deliver a comprehensive, transparent, or dependable evaluation of the expected environmental impacts. The flexible Project

Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty and hinders the ability to apply a worst-case scenario consistently. This diminishes the integrity of the assessment, leaving both the public and the competent authority without a clear understanding of the actual environmental effects of the development that may ultimately be constructed.

The application leans heavily on yet-to-be-defined mitigation measures, monitoring strategies, and management plans. Seeking consent under these conditions implies that any environmental damage will be addressed only after approval, inhibiting a meaningful evaluation of their effectiveness or the assessment of residual impacts. This postponement of essential information to stages following consent is not procedurally acceptable and contradicts the aims of the Environmental Impact Assessment framework, which stipulates that likely significant effects and mitigation strategies must be clearly defined before any determination.

Additionally, the application is marred by substantial evidential deficiencies, including missing baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. These shortcomings result in uncertainty concerning the scale and significance of impacts, particularly where claims of negligible or non-significant effects are made without adequate supporting data. The lack of sufficient information obstructs a comprehensive understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be aligned with statutory obligations.

As a result, the application does not satisfy the evidential threshold established under the Habitats Regulations, which requires the exclusion of adverse effects beyond reasonable scientific doubt. This raises concerns under the precautionary principle, especially regarding protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate adherence to the National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it cannot substantiate that impacts have been thoroughly assessed or that appropriate safeguards are in place.

Overall, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data contribute to rendering the Environmental Impact Assessment Report incomplete and unreliable. These deficiencies obstruct a lawful and thorough assessment of environmental impacts and leave the competent authority ill-equipped to make a determination based on the information currently available.

ASSESSMENT OF ALTERNATIVES

The application significantly fails to meet the statutory requirements of the Environmental Impact Assessment regime, particularly regarding the assessment of alternatives. It lacks a structured and reasoned comparison of realistic alternatives based on their environmental effects, instead providing a narrative of project evolution.

This approach does not adequately demonstrate that less harmful options have been properly identified, assessed, and selected over more damaging solutions.

Furthermore, the absence of a transparent, evidence-based comparison of alternative offshore locations, development scales, and design configurations raises serious concerns. Notably, the application does not show that the developer has seriously considered placing turbines further offshore, where potential visual, ecological, and coastal impacts could be mitigated. The West Lewis coastline's sensitivity and the critical role of proximity to shore in assessing impact make this lack of analysis particularly detrimental. Consequently, it is impossible to determine that the proposed siting is indeed the least damaging option available.

The shortcomings also extend to the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly examined to avoid or minimise impacts on sensitive receptors. This includes significant areas of cultural and spiritual importance, such as Barvas Cemetery. The failure to establish a clear avoidance strategy and the absence of comparative analysis indicate a reliance on post-design mitigation measures rather than applying mitigation by design.

As a result, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This is a failure to adhere to the established mitigation hierarchy and leaves the competent authority unable to ascertain whether more appropriate and less harmful alternatives exist. Without a comprehensive alternatives assessment, it cannot be claimed that the proposal is sustainable or compliant with relevant policies.

From a policy standpoint, this inadequacy undermines compliance with National Planning Framework 4, especially in the context of safeguarding natural environments, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment represents a significant omission that further substantiates the conclusion that the application has not been adequately evaluated, thus failing to support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species lacks completeness and reliability, particularly concerning the ecological receptors present in the West Lewis coastal environment. This area is known for its sensitivity and biological activity, yet the baseline data remains inadequate, while the methodologies employed fail to accurately document the presence, behaviour, and habitat utilisation of species. Consequently, the assessment does not offer a reliable evidential basis for evaluating potential impacts.

A significant shortcoming involves the European Protected Species of otters, for which the application does not sufficiently recognise or assess their use of coastal regions for both foraging and movement. The neglect of their core foraging range and behavioural patterns has led to an inadequate evaluation of the potential effects arising from

construction disturbance, noise, and increased activity. This oversight compromises any conclusions drawn regarding the absence of significant effects on this species.

The assessment also encounters shortcomings regarding basking sharks, as it relies heavily on aerial surveys that introduce significant detection bias, particularly in the challenging conditions of the Atlantic. This reliance likely leads to an underestimation of the sharks' presence, especially when contrasted with established land-based observations showing frequent utilisation of these waters. The failure to integrate or properly consider such data contributes to an incomplete baseline, thereby undermining the reliability of the presented conclusions.

These methodological flaws result in findings of negligible or non-significant effects that are based on assumptions rather than substantial evidence. The lack of adequate baseline data obstructs a meaningful evaluation of cumulative and indirect impacts, including those related to seasonal variations and broader ecosystem interactions. Such gaps foster uncertainty about the actual risks posed 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 the National Planning Framework 4, as protected species have not been accurately identified or assessed. The degree of uncertainty introduced obstructs the ability to exclude adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. In light of these circumstances, it is not lawful to grant consent.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, exhibiting significant gaps in evidence and internal contradictions that weaken its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application fails to provide sufficient evidence to demonstrate that these species will not be adversely affected. The development is situated within crucial foraging areas and migratory pathways, yet the assessment does not adequately evaluate the risks associated with displacement, collision, or habitat loss.

A critical inconsistency within the application emerges as the developer asserts that no significant adverse effects are anticipated while simultaneously progressing a Habitats Regulations derogation case, which is only required if significant harm is expected. This contradiction raises doubts about the reliability of the assessment, suggesting that the conclusions drawn are unsupported by the available evidence. Furthermore, the assessment lacks sufficient evidence to ensure that seabirds linked to protected sites,

including the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds has not been thoroughly addressed, and the reliance on modelling methods introduces uncertainty, particularly concerning species in severe decline such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, especially in cases where baseline data is lacking and behavioural responses are not fully understood.

The placement of turbines within a recognised migratory corridor adds another substantial risk, effectively creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The application fails to adequately consider the long-term effects of sustained mortality in this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential standard required to determine that there will be no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, along with data gaps and modelling issues, indicates that the standard of beyond reasonable scientific doubt has not been satisfied. This invokes the precautionary principle and obstructs a lawful conclusion in favour of consent. Moreover, the deficiencies noted 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 opposition to national policy.

In summary, the assessment is unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. These inadequacies hinder a robust evaluation of impacts and reinforce the conclusion that the application fails to meet the statutory requirements necessary for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

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

Moreover, the assessment fails to consider intangible cultural heritage, such as the Gaelic language and traditions, along with the longstanding connection between the community and the coastal environment. These aspects are vital to the identity of the

area, yet they are not included in the assessment, creating a significant gap. Without acknowledging these factors, the true cultural impact of the development remains unclear.

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer commissioned a Social Impact Assessment that involved focus groups with local residents, but the full report has not been made public. This omission creates a significant evidential gap and hinders both public understanding and the competent authority's ability to evaluate social risks identified in the developer's research. Available summaries reveal that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts stem from direct engagement with the community and are not mere speculation. However, the lack of access to the complete assessment limits scrutiny of the findings and affects the evaluation of their significance in the decision-making process.

The proposal has also been perceived as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's own findings. Nevertheless, these impacts have not been adequately incorporated into the main application or given the necessary attention. The failure to disclose the full Social Impact Assessment obscures the true human and social cost associated with the development.

This lack of transparency compromises the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for projects of this magnitude, especially when community character and functioning are at stake. Without the complete dataset, the application does not provide a full evidential basis for weighing benefits against harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Developments must promote positive health outcomes and mitigate harm; however, existing evidence suggests negative effects that have not been fully revealed. Without the complete assessment, it cannot be shown that the application complies with this policy.

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

Overall, the non-disclosure of the full Social Impact Assessment, along with the evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This limits the ability to make a lawful determination and reinforces the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

The proposed development would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and eroding the defining qualities of naturalness and remoteness. Furthermore, there are significant methodological concerns regarding the selection and presentation of visual viewpoints. It appears that the viewpoints chosen may not adequately capture the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the risk of underestimating the magnitude of the visual impact, thereby undermining the assessment's reliability.

Additionally, the assessment neglects to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Significant sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a larger landscape setting, interconnected visually and spatially with the Atlantic horizon. Treating these sites as isolated assets fails to recognise their interdependence and results in an incomplete evaluation of the impacts on their settings and cultural

significance. The industrialisation of the seascape would disrupt these relationships, changing the context in which heritage assets are experienced and severing their connection to the natural horizon. This represents a broader cultural and spatial harm that has not been adequately addressed within the application.

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

Moreover, it is evident that the impacts identified cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable, resulting in a fundamental and permanent change that cannot be reduced to an acceptable level through mitigation efforts. Overall, the assessment does not accurately capture the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings prevent a reliable evaluation and strongly indicate that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal's evaluation of construction and pollution risks lacks comprehensiveness, preventing a thorough assessment of its likely environmental impacts. It entails significant seabed preparation and installation works in a challenging Atlantic environment, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application relies on mitigation and contingency measures that are to be formulated after consent is granted, which hinders any meaningful appraisal of their effectiveness.

This reliance on unspecified future measures raises serious concerns, especially given the sensitivity of the receiving environment. The coastline of West Lewis features clean coastal waters and vital habitats that are susceptible to disturbances from sediment and contamination. While the application acknowledges risks like sediment mobilisation and possible chemical or oil spills, it fails to provide adequate details on prevention, control, or monitoring strategies for these risks.

Additionally, there is uncertainty surrounding the scale and behaviour of sediment plumes that may result from seabed disturbances and cable installations. In the absence of robust modelling and well-defined management strategies, it remains impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty similarly extends to potential repercussions for sensitive marine species and habitats already noted in the broader assessment.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent, the application obstructs the

evaluation of whether suitable measures exist to address pollution incidents. This not only introduces procedural risks but also undermines the competent authority's capacity to evaluate environmental protection measures at the determination stage.

From a regulatory standpoint, deferring critical environmental safeguards contradicts the obligations set forth by the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be evaluated prior to granting consent, and without this essential information, a lawful decision cannot be reached. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the absence of defined mitigation strategies, insufficient detailed management plans, and the uncertainty surrounding potential impacts collectively render the assessment materially deficient. These shortcomings hinder a rigorous evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The evaluation of marine life and fisheries presented in the application is inadequate, lacking a comprehensive analysis of both ecological and socio-economic effects. The waters adjacent to the West Lewis coast host a rich marine ecosystem and a thriving fishing industry. However, the application does not sufficiently demonstrate that these critical habitats and uses can be preserved without significant disruption.

One of the principal concerns is the presumption that fishing activities can be displaced without repercussions. The application fails to provide evidence regarding the availability, accessibility, or capacity of alternative fishing grounds to accommodate the resultant pressure. This critical omission raises substantial concerns, as displacement could lead to overfishing in different areas, which may have broader economic implications for the local fishing fleet. Without a detailed and evidence-based evaluation, the potential consequences for fisheries and local livelihoods remain unclear.

Additionally, the proposal presents considerable risks to marine species, particularly due to the underwater noise generated during construction activities. The prolonged use of high-energy hammer piling is anticipated to disturb marine life over extensive distances, impacting species such as dolphins. Notably, the projected disruption to a significant portion of the local bottlenose dolphin population warrants serious attention, yet the application downplays these impacts, lacking adequate supporting evidence.

There exists a notable inconsistency within the application, where the necessity for licenses to permit harm to European Protected Species is recognised, even while impacts are described as negligible. This contradiction undermines the credibility of the assessment and raises significant compliance issues with the Habitats Regulations, particularly where expected harm requires legal authorisation.

Moreover, the assessment neglects to address cumulative impacts arising from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. Without a holistic evaluation of these interconnected effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

Collectively, the absence of evidence related to fishing displacement, the underestimation of acoustic impacts, and the internal contradictions within the application contribute to an incomplete and unreliable assessment. These shortcomings impede a thorough evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is lacking and does not fully consider the impacts of what constitutes a single integrated project. The offshore turbines and onshore works are closely linked but assessed separately, leading to a fragmented evaluation that masks the true extent of the environmental and socio-economic effects.

Key onshore components include the installation of cabling across protected moorland, the construction of a substation near Stornoway, and the development of access routes through sensitive landscapes. These activities require excavation through areas of deep peat, particularly within Barvas Moor, a significant carbon store and ecologically sensitive habitat. The application fails to offer a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By neglecting to assess the 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 disconnection between offshore and onshore elements leads to an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

Moreover, the proposal presents substantial risks to sensitive habitats, such as machair systems and peatland environments, which benefit from policy protection. The application does not sufficiently demonstrate that impacts on these habitats have been thoroughly evaluated or that suitable avoidance measures have been implemented, creating a significant evidential gap regarding biodiversity protection.

Concerns also arise about carbon balance, as the disturbance of peatland can release stored carbon, potentially leading to a carbon debt that contradicts the goals of renewable energy development. The application does not adequately address this critical issue or prove that the overall carbon balance remains advantageous.

Additionally, 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 initiated, raising serious doubts about deliverability and lawful implementation.

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 both the National Marine Plan and National Planning Framework 4. The inability to prove that impacts can be avoided or mitigated further diminishes the application.

In summary, the disjointed assessment of project components, the lack of a comprehensive evaluation, and insufficient evidence regarding environmental and land use impacts render this segment of the application incomplete and unreliable, thus obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of evaluation regarding dark skies and nocturnal wildlife is a serious deficiency 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 appeal. The proposed development includes the installation of permanent red aviation lighting that would be visible over vast distances. This would create an intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time landscape.

The proposal fails to address how this lighting will impact visual amenity, landscape character, and the experiences of both residents and visitors. This is particularly concerning given the significance of dark skies to local identity and the emerging sector of astro-tourism. The absence of this analysis creates a notable gap in the overall assessment of both landscape and environmental effects.

Moreover, there is a complete lack of evaluation regarding the implications for nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly vulnerable to artificial lighting due to their phototactic responses, which can lead to disorientation and a heightened risk of collision. The application neglects to include any assessment of lighting impacts or a phototaxis study, failing to examine how aviation lighting might impact these species or exacerbate mortality rates.

This oversight is intensified by the reliance on daytime survey data within the ornithological assessment, which does not adequately capture nocturnal activity or the associated risks. For instance, Kittiwakes, which may forage or migrate at night, are

also susceptible to disorientation from artificial lighting, yet this risk has not been evaluated. The lack of site-specific night-time data represents a crucial gap in understanding the ecological impacts of the proposal.

Without a thorough assessment of nocturnal effects, it is impossible to ascertain whether the proposal could negatively impact protected species or designated sites. The necessary evidential standard needed 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, particularly regarding the protection of natural areas and environmental quality. It also diminishes the overall assessment of landscape and seascape impacts, as the character of the night environment is a crucial aspect of the ecosystem.

In summary, 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 unable to support a lawful determination.

TOURISM

The tourism sector on the Isle of Lewis has experienced notable growth, with its value increasing from £65 million in 2017 to over £81.5 million, generating more than 1,000 jobs and contributing up to 16% of the island's economy. However, the planning application lacks a comprehensive assessment of the potential impacts on this vital sector. Despite acknowledging that 86% of visitors are attracted by the area's stunning scenery, the application fails to quantify how large-scale offshore infrastructure might alter visitor numbers, behaviours, or economic contributions.

Tourism relies heavily on the area’s unspoiled coastline, near-pristine landscapes, and dark skies, all of which enhance the visitor experience. The assessment neglects to consider the significance of environmental quality in tourism, including the emerging markets of nature-based and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this oversight, leaving a crucial gap in understanding how the proposed development could impact these growing sectors of the local economy.

In a community with limited economic diversification, the failure to evaluate the effects on tourism has broader implications for employment, local businesses, and the sustainability of the community. The omission of a compliant Island Communities Impact Assessment means that the economic vulnerabilities inherent in this situation have not been properly examined, as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly concerning economic impacts and the need to show a net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector, lacking the necessary evidence for the competent authority to evaluate

the economic consequences of the proposal.

Collectively, the deficiencies in quantifying tourism impacts, understanding the environmental drivers influencing visitor behaviour, and considering the island's economic reliance culminate in a significant evidential void. This absence hinders 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 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

Lewis is ruggered and beautiful - these would be a carbuncle on the 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: 0DDD6E6F

Member of the public 1126

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The concerns raised stem from a thorough examination of the Environmental Impact Assessment Report and associated documents, highlighting significant planning, environmental, cultural, and procedural shortcomings. The proposed development is situated off the west side of the Isle of Lewis, a region known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The size, location, and design of the project raise critical questions about its alignment with statutory obligations, national policy, and the principles of sustainable development.

The application is lacking in sufficient evidential support for a lawful determination. Essential environmental data is absent, baseline information is sparse and inconsistent, and key components of the proposal are not clearly defined. The flexible design framework used inhibits a proper understanding of potential significant effects, and the reliance on unspecified mitigation measures prevents any assessment of their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community effects, and assertions of negligible or insignificant impacts are not backed by solid evidence.

There are evident and serious conflicts with policy. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially regarding biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests necessary for consent and compromise the ability of the competent authority to conclude that the development is acceptable according to policy.

The unprecedented scale of the project raises significant issues, with large turbines proposed in close proximity to the shoreline, which could have substantial implications for landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicates that the application is incomplete and unable to support a lawful determination. Under these conditions, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is insufficient and fails to deliver a comprehensive, transparent, or reliable overview of the anticipated environmental consequences of the proposal. The introduction of a flexible Project Design Envelope, lacking definitive commitments to specific turbine dimensions, layouts, or configurations, creates substantial uncertainty. This uncertainty hampers a consistent application of a worst-case scenario, thereby compromising the integrity of the assessment. As a result, the projected impacts may not accurately represent the development that will ultimately be constructed, which prevents both the public and the competent authority from grasping the true scale of environmental effects.

The application places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. As such, consent is sought with the understanding that any environmental harm will be addressed subsequently. This approach obstructs a meaningful evaluation of the effectiveness of these measures and an assessment of residual impacts. Deferring key information to post-consent stages is procedurally unacceptable and contradicts the aims of the Environmental Impact Assessment regime, which mandates that likely significant effects and their mitigation be clearly established before any determination is made.

Moreover, there are notable evidential deficiencies, such as gaps in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the magnitude and significance of impacts, especially where findings of negligible or non-significant effects are offered without robust supporting data. The lack of adequate information inhibits a clear comprehension of cumulative and worst-case impacts, introducing scientific uncertainty that is incompatible with statutory requirements.

Consequently, the application does not fulfil the evidential threshold mandated by the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate alignment with National Planning Framework 4, especially regarding biodiversity protection and environmental integrity, as it is not evidenced that impacts have been fully assessed or that suitable safeguards are established.

In summary, the reliance on an unspecified design envelope, the absence of defined mitigation measures, and the existing gaps in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These inadequacies hinder a lawful and robust evaluation of environmental effects and leave the competent authority unable to make an informed decision based on the information presented.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives in this application is materially inadequate and does not fulfil the statutory requirements of the Environmental Impact Assessment regime.

Instead of delivering a structured and reasoned comparison of realistic alternatives based on environmental effects, the submission offers a narrative account detailing the project's evolution. This methodology fails to illustrate that less harmful options have been properly identified, assessed, and chosen over more damaging solutions.

There is a lack of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not provide evidence that the developer has seriously considered positioning turbines further offshore, where visual, ecological, and coastal impacts would likely be lessened. Considering the sensitivity of the West Lewis coastline and the crucial role of proximity to shore in assessing impact, the absence of this analysis hinders any conclusion that the proposed siting is the least damaging option.

These deficiencies also extend to the assessment of cable routing and landfall, with insufficient evidence demonstrating 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 and comparative analysis indicates that mitigation by design has not been implemented, relying instead on post-design measures.

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

From a policy standpoint, this shortcoming undermines compliance with National Planning Framework 4, particularly in relation to the protection of natural places, 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 been adequately evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

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

A significant oversight in the assessment pertains to otters, which are classified as a European Protected Species. The application does not adequately recognise or assess their active utilisation of coastal areas for foraging and movement. This neglect extends

to their core foraging range and behavioural patterns, resulting in an inadequate evaluation of the potential effects related to construction disturbance, noise, and increased activity. Such oversights compromise the conclusions drawn regarding the absence of significant effects on this species.

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development raises serious concerns regarding the adequacy of the ornithological assessment, which is fundamentally flawed, revealing substantial gaps in evidence and internal inconsistencies that compromise its conclusions. The site is situated on the west coast of the Isle of Lewis, an area that supports internationally important seabird populations, many of which are already in decline. However, the application does not adequately demonstrate that these species will not be adversely affected, as required by the evidential standard.

Within the assessment, there exists a significant contradiction. The developer asserts that there will be no significant adverse effects while simultaneously presenting a Habitats Regulations derogation case, which should only be necessary if significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment and indicates that the conclusions drawn are not substantiated by the available

evidence. Furthermore, the assessment fails to sufficiently demonstrate that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will be unaffected. The critical nature of these feeding grounds is insufficiently acknowledged, and the reliance on modelling approaches introduces a degree of uncertainty, particularly for species facing severe decline, including Kittiwakes and Fulmars. The methodologies utilised may underestimate mortality rates, particularly in situations where baseline data is lacking and the behavioural responses of the species are not comprehensively understood.

The placement of turbines within a designated migratory corridor presents an additional risk, as it effectively creates a barrier along a primary flight path utilised by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor have not been adequately assessed, nor have the potential impacts on species that possess relatively small global populations been considered.

From a regulatory standpoint, the application does not fulfil the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, together with data deficiencies and limitations inherent in the modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, hindering the ability to lawfully support a conclusion in favour of consent.

Moreover, the identified deficiencies represent a breach of the requirements set forth in 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 puts the proposal in direct opposition to national policy.

In summary, the assessment is unreliable owing to its internal inconsistencies, methodological shortcomings, and insufficient evidence. These failings hinder a thorough evaluation of the potential impacts and lead to the conclusion that the application does not satisfy the statutory requirements needed to support a determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity is severely lacking, particularly in its treatment of the West Lewis coastline as a living cultural landscape. This area, where environment, language, tradition, and community intertwine, is not adequately acknowledged. Instead, the application adopts a narrow perspective, viewing heritage merely as a collection of static assets while overlooking their dynamic social, cultural, and spiritual significance within the community.

Among the key shortcomings is the inadequate treatment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet the assessment reduces them to mere static

features. It fails to appreciate their ongoing use and the implications of development on their surroundings. This mischaracterisation leads to an incomplete cultural evaluation and neglects their vital role in community life.

Moreover, the assessment overlooks the importance of intangible cultural heritage, such as the Gaelic language and local traditions, which are essential to the identity of the area. The absence of these elements from the assessment represents a critical gap. Without acknowledging these factors, the true cultural impact of the development remains obscure.

Concerns extend to community rights and engagement, particularly regarding the Gaelic-speaking population, which embodies a distinct cultural identity recognised as Indigenous People. However, there has been no process of Free, Prior and Informed Consent, compromising the credibility of the assessment and failing to adhere to established principles of participation in matters that affect cultural and environmental interests.

A significant procedural failing is the lack of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. The absence of this assessment impedes the competent authority's ability to legally evaluate the social, cultural, and economic impacts on the island community, rendering a lawful determination impossible.

From a policy standpoint, these deficiencies position the proposal in direct opposition to National Planning Framework 4, particularly concerning the safeguarding of historic assets and sites. The neglect to consider both tangible and intangible heritage, as well as the living cultural practices, indicates a notable divergence from policy standards.

In summary, the failure to address living heritage, intangible cultural values, community rights, and adherence to statutory obligations results in a significant evidential void. The cultural effects of the proposed development have not been adequately assessed, leaving the application without a robust foundation for understanding the true cultural ramifications.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The non-disclosure of the full Social Impact Assessment represents a significant evidential gap that undermines the evaluation of the proposed development. The developer engaged local residents through focus groups, yet the complete report remains unpublished. This lack of transparency obstructs both public understanding and the competent authority's ability to fully grasp the social risks highlighted in the developer’s own research.

Residents are already reporting measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts stem from direct engagement and are not speculative. However, without access to the full assessment, there is inadequate scrutiny of the findings, which limits the assessment of their significance in

the decision-making process.

Moreover, the proposal is viewed as a direct threat to community identity and cohesion, with findings indicating potential “cultural loss” that have not been adequately considered in the main application. The failure to fully integrate these impacts diminishes the acknowledgment of the true human and social costs associated with the development.

The withholding of the full Social Impact Assessment compromises the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health implications is crucial for developments of this magnitude, particularly when they may impact community character and functioning. By not providing the entire dataset, the application lacks a complete evidential basis for balancing benefits against potential harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Development should foster positive health outcomes and mitigate harm; however, existing adverse effects, which have not been fully disclosed, suggest a failure to meet this requirement. Without the complete assessment, adherence to this policy cannot be validated.

The procedural implications of this situation are profound. The competent authority cannot conduct a thorough socio-economic and health evaluation in the absence of the full Social Impact Assessment. This omission is a significant shortfall within the application and fails to satisfy the evidential demands of the Environmental Impact Assessment regime.

Collectively, the non-disclosure of the complete Social Impact Assessment, alongside evidence of current adverse impacts, renders the assessment incomplete and unreliable. This situation obstructs a lawful determination and reinforces the assertion that the application lacks sufficient information to be supported.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of impacts on seascape, landscape, and visual aspects is significantly lacking and does not appropriately capture the extent of change or the sensitivity of the environment. The coastline of West Lewis features an open Atlantic horizon, an undeveloped character, and a pronounced sense of remoteness. The introduction of large turbines close to the shore would create a persistent industrial presence, fundamentally changing this character and resulting in an irreversible transformation of the landscape.

The visual change has not been adequately represented in the application. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, which would diminish visual amenity and compromise the qualities of naturalness and remoteness. The assessment does not adequately convey the level of impact or its significance within such a sensitive

landscape context.

Concerns arise regarding the selection and presentation of visual viewpoints. Evidence indicates that some viewpoints may fail to represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and valued landscapes. This raises the possibility that the visual impact magnitude has been underestimated, compromising the assessment's reliability.

There is also a failure to evaluate the interconnected nature of landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape context linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as separate entities rather than acknowledging their interdependence, resulting in an incomplete understanding of impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and their connection to the natural horizon. This signifies not just a visual impact but also a more extensive cultural and spatial detriment that has not been adequately assessed in the application.

From a policy viewpoint, the proposal directly contradicts National Planning Framework 4 regarding the safeguarding of natural areas and historic assets. The proposed changes are incompatible with the requirement to protect landscape character, visual amenity, and the settings of culturally significant sites. Additionally, the lack of a thorough worst-case assessment further weakens any assertion of policy adherence.

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

Overall, the assessment does not accurately represent the magnitude of impact, the sensitivity of the environment, or the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and support the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is lacking in necessary detail for evaluating environmental effects. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans for the substantial seabed preparation and installation works proposed in a high-energy Atlantic environment. Instead, the application relies on future mitigation and contingency measures that will be prepared after consent, which obstructs a meaningful evaluation of their adequacy or effectiveness.

This reliance on undefined future measures raises significant concerns, especially

considering the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks like sediment mobilisation and accidental chemical or oil spills, it fails to provide sufficient detail on how these issues will be prevented, controlled, or monitored.

There is uncertainty surrounding 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 effects of these impacts. This uncertainty also pertains to potential effects on marine species and habitats that have already been identified as sensitive.

Furthermore, the lack of detailed emergency response procedures exacerbates these issues. Deferring contingency planning until after consent hampers the ability to evaluate whether adequate safeguards are in place to respond to pollution incidents. This creates procedural risk and diminishes the competence of the authority to assess environmental protection measures at the point of determination.

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

In conclusion, the combination of undefined mitigation measures, inadequate management plans, and uncertainty about potential impacts renders the assessment significantly deficient. These shortcomings obstruct a thorough evaluation of construction and pollution risks, reinforcing the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment regarding fisheries and marine life lacks thoroughness and does not adequately evaluate ecological or socio-economic impacts. The fishing industry is active off the West Lewis coast, which is home to a diverse marine ecosystem. However, the application does not prove that these habitats and uses can be safeguarded or sustained without significant disruption.

A major concern is the assumption that fishing activities can be moved without consequences. The application fails to provide evidence that alternative fishing grounds are available and accessible, or that they can handle additional pressure. This lack of evidence is critical, as displacement could lead to overfishing in other areas and might have broader economic repercussions for the local fishing fleet. The consequences for fisheries and livelihoods cannot be comprehensively understood without a clear and evidence-based assessment.

Moreover, the proposal poses significant risks to marine species, particularly due to the underwater noise produced during construction. The use of high-energy hammer piling over an extended period is likely to disturb marine life across considerable distances, impacting species such as dolphins. The potential disturbance to a notable portion of the local bottlenose dolphin population raises serious concerns, yet the application minimizes these effects without sufficient evidence to support such claims.

There is also a notable inconsistency in the application, as it acknowledges the need for licenses to allow harm to European Protected Species, while simultaneously stating that the impacts are negligible. This contradiction weakens the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially where harm is expected to occur at levels requiring legal authorisation.

Additionally, the assessment neglects to address cumulative impacts that arise from various pressures, including habitat disturbance, noise, and the displacement of fishing activity. A comprehensive evaluation of these combined effects is necessary to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It fails to establish that the development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity, hindering any conclusion that the proposal constitutes sustainable development.

In summary, the insufficiency of evidence regarding fishing displacement, the minimization of acoustic impacts, and the internal contradictions indicate that the assessment is incomplete and unreliable. These shortcomings hinder a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application fails to provide a complete assessment of onshore infrastructure, which is critical for understanding the full impacts of this integrated project. The offshore turbines and onshore works are connected, yet they have been assessed separately. This fragmented approach obscures the true 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 involve excavation in areas of deep peat, particularly in Barvas Moor, a significant carbon store and ecologically sensitive habitat. The lack of a comprehensive assessment of these impacts limits the understanding of the project's overall environmental footprint.

By deferring the assessment of onshore impacts, the application fails to allow for a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered together, but the

separate assessments of offshore and onshore elements mean that the combined impacts on peatlands, habitats, and communities are not fully recognised.

There are considerable risks to sensitive habitats, including machair systems and peatland environments, which are afforded policy protection. The application does not show that it has fully assessed the impacts on these habitats or that it has applied appropriate avoidance measures, leading to a significant evidential gap concerning biodiversity protection.

Concerns also arise regarding carbon balance. Disturbance of peatland can release stored carbon, potentially leading to a carbon debt that contradicts the goals of renewable energy development. The application does not sufficiently address this issue or demonstrate that the overall carbon balance is advantageous.

Routing infrastructure through active croft land presents potential conflicts with existing land use and legal rights. The application does not provide evidence that the necessary consents or processes have been initiated, raising doubts about deliverability and legal implementation.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment concerning dark skies and nocturnal wildlife represents a significant omission in the Environmental Impact Assessment. The West Lewis coastline features exceptionally dark skies, which are vital to the environmental quality, cultural identity, and tourism value of the area. The proposed project includes permanent red aviation lighting that will be visible over considerable distances, resulting in a continuous and intrusive “wall of light” effect across the western horizon, which would fundamentally alter the night-time environment.

Furthermore, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, and the experience of both residents and visitors. This is particularly concerning given the critical role that dark skies play in the area's identity and the burgeoning sector of astro-tourism. The absence of such evaluations reveals a significant gap in the overall landscape and environmental assessment.

Equally important is the lack of analysis regarding the impacts on nocturnal wildlife. Certain species, including Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel, are especially sensitive to artificial lighting due to phototaxis, which can

result in disorientation and increased risks of collision. The application does not contain a lighting impact assessment or a phototaxis study, thus neglecting to consider how aviation lighting could impact these species or heighten mortality rates.

This deficiency is exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal activity or related risks. Species such as Kittiwakes, which may engage in foraging or migration at night, are also at risk of disorientation from artificial lighting; however, this risk remains unassessed. The absence of site-specific data related to night-time activity creates a substantial gap in understanding the ecological impacts.

In the absence of an evaluation of nocturnal impacts, it becomes impossible to ascertain whether protected species or designated sites could be adversely affected. The necessary evidential standard to rule out adverse effects beyond reasonable scientific doubt cannot be satisfied, which invokes the precautionary principle and hinders a lawful determination.

From a policy standpoint, these omissions are in conflict with National Planning Framework 4, particularly regarding the protection of natural places and environmental quality. Additionally, it undermines the comprehensive assessment of landscape and seascape impacts, as the character of night-time environments is an integral element of the overall environment.

In summary, the complete lack of assessment pertaining to dark skies and nocturnal wildlife constitutes 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 application presents a materially deficient assessment of tourism impacts, neglecting to evaluate the economic and social consequences for a critical sector of the Isle of Lewis economy. The area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness are fundamental to tourism, which has expanded significantly, rising from £65 million in 2017 to over £81.5 million, supporting over 1,000 jobs and representing up to 16% of the island's economy. Despite acknowledging that 86% of visitors are attracted by scenery, the application fails to provide a quantified analysis of how large-scale offshore infrastructure would influence visitor numbers, behaviours, or the overall economic contribution of tourism.

Moreover, the assessment overlooks the essential role of environmental quality in sustaining tourism. The importance of unspoiled landscapes and dark skies is crucial for enhancing visitor experiences and tapping into emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this deficiency, leaving a significant void in understanding the implications for a recognised and growing segment of the local economy.

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

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

The combined shortcomings in quantifying tourism impacts, assessing environmental drivers of visitor behaviour, and recognising island economic dependency culminate in a significant evidential gap. This undermines a robust evaluation of economic effects and reinforces the conclusion that the application remains incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm indicates a significant shortfall in meeting the principles of sustainable development as outlined by statutory duties and national policy. It echoes the key issues that led to the rejection of the Lewis Wind Power proposal in 2008, wherein the level of industrialisation was deemed unacceptable. This current application is presented under a more robust policy framework that emphasises biodiversity, peatland conservation, landscape integrity, and community wellbeing.

There are substantial gaps in the evidential basis provided for the proposal. Notably, there is a reliance on an undefined design envelope, incomplete baseline data, unspecified mitigation measures, and key impact pathways that have been overlooked, such as those concerning nocturnal wildlife, the entirety of the onshore infrastructure, and the effects on tourism. This leads to an Environmental Impact Assessment that is insufficient, failing to offer a comprehensive understanding of the potential significant effects or residual impacts.

Furthermore, the proposal displays evident procedural shortcomings. The lack of a compliant Island Communities Impact Assessment violates statutory obligations set forth by the Islands (Scotland) Act 2018. Additionally, the omission of a complete Social Impact Assessment is a significant deficiency. These shortcomings hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, thereby rendering the application unsuitable for determination.

The proposal is at odds with the National Planning Framework 4, as it does not adequately demonstrate the protection of biodiversity, natural habitats, and cultural heritage. It fails to establish that the health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, particularly due to the absence of tourism

impact analysis. Furthermore, the cumulative effects of both offshore and onshore components have not been thoroughly evaluated, which clouds the understanding of impacts on peatlands, carbon balance, habitats, and agricultural land.

Uncertainties surrounding environmental risks remain, with incomplete assessments regarding marine ecology, seabirds, protected species, and marine mammals, which in some aspects are inconsistent with each other. The evidence threshold necessary to discount adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and precluding a lawful determination that the impacts are acceptable.

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

In summary, the application is both procedurally and substantively unfit for determination. The multitude of information deficiencies, coupled with conflicts with policy and unresolved environmental concerns, obstruct a lawful and evidence-based decision-making process. Therefore, it is requested that consent for the Spiorad na Mara Offshore Wind Farm be denied in its entirety.

Additional Comments

I object the plan for a huge variety of reasons.
Part of our island identity is based on its beauty and how special the views are all around Lewis. For generations those views have remained unchanged and what a wonderful thing - change is not always a positive thing. This proposal will ruin the landscape forever.
The tourism industry depends on people coming to see our island and its uniqueness, at how much it differs to the rest of Scotland and the world. It is without question one of the most special places on earth.
This proposal will have a negative impact across the island as a whole.
The size and scale of the project is beyond comprehension. Our children and young people, my two young sons included, are horrified at this proposal-they do not want it and we should listen to them, they are the future. They are aware of the negative impact it will have on marine life and bird life. They appreciate, like we do, how fortunate we are to see uninterrupted dark skies in the winter months - this would be gone forever if the project goes ahead.
I object to this project for many reasons, along with everyone else I know. It would be interesting to get clarification on which communities are on board with the proposal as it is hard to believe that the majority of our small island would welcome some of the largest turbines in the world onto our island. If there are any who would, they are surely in the minority.
The island does not have a suitable infrastructure to facilitate this project. The island does not want this project to go ahead. The island has spoken and the people should be listened to.

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: 1ECF0A4B

Member of the public 1127

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

Dear Sir/Madam

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

The application lacks an adequate evidential basis necessary for a lawful determination. Essential environmental data is missing, with baseline information being limited and inconsistent, leaving key elements of the proposal undefined. The flexible design framework impedes a clear understanding of potential significant effects, while the reliance on unspecified mitigation measures hampers the assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, undermining the claims of negligible or non-significant effects, which are unsupported by robust evidence.

There are substantial policy conflicts evident 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 does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests required for consent, hindering the competent authority's ability to deem the development acceptable from a policy standpoint.

The unprecedented scale of the proposal, featuring large turbines situated in close proximity to the shoreline, raises significant concerns about landscape capacity, visual dominance, and overall environmental impact. Collectively, the lack of sufficient information, the reliance on undefined mitigation, the evidential weaknesses, and the clear policy non-compliance highlight that the application is incomplete and incapable of supporting a lawful determination. Under these conditions, the precautionary principle must apply.

ASSESSMENT OF ALTERNATIVES

The proposed application fails to meet the statutory requirements of the Environmental Impact Assessment regime, particularly in its assessment of alternatives. Instead of offering a structured and reasoned comparison of feasible alternatives based on their environmental effects, the application presents a narrative of the project's evolution. This method does not adequately demonstrate that less harmful options have been identified, evaluated, and chosen over more damaging solutions.

Moreover, there is a lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Notably, the developer has not shown that placing turbines further offshore has been seriously considered, despite the likelihood that such a move would reduce visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline and the critical significance of proximity to shore in assessing impact make this omission particularly concerning. Without such analysis, it is impossible to assert that the proposed siting is the least damaging option.

The deficiencies also extend to the assessment of cable routing and landfall. There is insufficient evidence indicating that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors, including areas of cultural and spiritual significance such as Barvas Cemetery. The lack of a clear avoidance strategy, coupled with the absence of comparative analysis, suggests that the principles of mitigation by design have not been employed, with an overreliance on post-design mitigation measures instead.

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

From a policy standpoint, these deficiencies undermine adherence to National Planning Framework 4, especially concerning 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 properly evaluated and cannot be lawfully determined.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed application fails to adequately assess the cultural heritage and community identity of the West Lewis coastline. This area is a living cultural landscape where environment, language, tradition, and community are interconnected. However, the assessment adopts a reductive perspective, viewing heritage merely as isolated, static assets rather than recognising their ongoing social, cultural, and spiritual functions within the community.

One major oversight is the treatment of culturally significant sites, including the

cemeteries at Dalmore, Bragar, and Barvas. These locations are active places for burial and spiritual practice, yet they are mischaracterised as static features, neglecting their continued use and significance. This lack of understanding diminishes the evaluation of cultural effects and overlooks their integral role in community life.

Moreover, the assessment disregards intangible cultural heritage, such as the Gaelic language, local traditions, and the historical relationship between the community and the coastal environment. These elements are fundamental to the area's identity but have been completely omitted, which is a considerable shortcoming. The absence of these factors leads to an incomplete understanding of the cultural impacts of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, recognised as Indigenous People, has a unique cultural identity. Yet, no process of Free, Prior and Informed Consent has been implemented, which undermines the assessment's legitimacy and fails to adhere to established participation principles regarding decisions that affect cultural and environmental interests.

Additionally, a critical procedural gap exists due to the lack of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot fulfil its legal obligations to evaluate the social, cultural, and economic impacts on the island community, resulting in an unlawful determination.

From a policy standpoint, these shortcomings place the proposal in direct contradiction to National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to consider both tangible and intangible heritage and to acknowledge living cultural practices constitutes a significant departure from policy requirements.

In summary, the neglect of living heritage, intangible cultural value, community rights, and statutory obligations creates a substantial evidential gap. The cultural impacts of the development have not been sufficiently assessed, and the application lacks a solid foundation for understanding the true cultural cost of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal involves the introduction of large-scale turbines near the West Lewis coastline, which is characterised by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. This development would create a continuous industrial presence that fundamentally alters the existing landscape, resulting in a permanent and irreversible transformation. The application fails to accurately represent the magnitude of visual change that would result from the turbines, which would dominate views from residential areas, historic sites, and popular coastal locations, thereby impacting visual amenity and eroding the qualities of naturalness and remoteness.

Additionally, there are methodological issues concerning the selection and presentation of visual viewpoints within the assessment. It appears that some viewpoints do not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This oversight introduces the risk of understating the visual impact, which ultimately undermines the reliability of the entire assessment.

Another significant shortcoming is the lack of consideration for the interconnected relationship between landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape that is visually and spatially linked to the Atlantic horizon. By treating these sites as isolated rather than recognising their interdependence, the assessment results in an incomplete evaluation of the impacts on their setting and cultural significance. The proposed industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are perceived and severing their relationship with the natural horizon. This effect represents not only a visual impact but also a broader cultural and spatial harm that the application fails to adequately assess.

From a policy standpoint, the proposal conflicts with National Planning Framework 4, particularly regarding the protection of natural places and historic assets. The scale of change is at odds with the obligation to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further detracts from any claims of policy compliance.

Moreover, the impacts identified cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. Thus, the resulting change is fundamental and permanent, rather than something that can be reduced to an acceptable level through mitigation measures.

In summary, the assessment does not accurately reflect the scale of impact, the sensitivity of the environment, or the interconnected nature of landscape and heritage. These deficiencies hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of the landscape in question.

CONSTRUCTION AND POLLUTION RISKS

The application lacks a comprehensive assessment of construction and pollution risks, failing to provide the necessary detail for evaluating potential environmental effects. Given the high-energy Atlantic environment, substantial seabed preparation and installation works are proposed, yet there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included. Instead, the application relies on mitigation and contingency measures that would only be prepared after consent, hindering any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures raises serious concerns due to 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. Although the application acknowledges risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it lacks sufficient detail on prevention, control, and monitoring strategies.

Moreover, there is considerable uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also pertains to potential effects on marine species and habitats that are already recognised as sensitive in the broader assessment.

The concerns are further exacerbated by the absence 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 to manage pollution events. This approach introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures at the point of determination.

From a regulatory standpoint, deferring critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and necessary mitigation measures must be evaluated prior to consent, and the lack of such 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 absence of defined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts create a materially deficient assessment. These deficiencies obstruct a robust evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry. However, the assessment of fisheries and marine life in the application is insufficient and fails to provide a robust evaluation of ecological or socio-economic impacts. It does not convincingly demonstrate that these essential uses and habitats can be preserved without significant disruption.

One major concern is the flawed assumption that fishing activity can be displaced without adverse consequences. The application lacks evidence to support the availability or accessibility of alternative fishing grounds capable of accommodating the additional pressure. This significant omission raises the risk of overfishing in different areas, potentially leading to wider economic repercussions for the local fishing fleet. Without a comprehensive and evidence-based assessment, the impacts on fisheries and the livelihoods they support cannot be accurately understood.

The proposal also presents considerable risks to marine species, particularly due to the underwater noise generated during construction. The high-energy hammer piling that would take place over an extended period is likely to disturb marine life across vast distances, with potential effects on species such as dolphins. The predicted disturbance to a large portion of the local bottlenose dolphin population is alarming, yet the application diminishes the significance of these effects without adequate supporting evidence.

There is a contradiction within the application itself, where the necessity for licences to permit harm to European Protected Species is acknowledged while simultaneously describing the impacts as negligible. This inconsistency undermines the credibility of the assessment and raises serious concerns about compliance with the Habitats Regulations, especially when harm is anticipated at a level that requires legal authorisation.

Moreover, the assessment neglects to consider cumulative impacts arising from multiple pressures, including habitat disturbance, noise pollution, and the displacement of fishing activity. Without a thorough evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate compliance with 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, thus preventing any conclusion that the proposal signifies sustainable development.

In summary, the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies render the assessment incomplete and unreliable. These shortcomings hinder a robust evaluation of impacts on marine life and fisheries, necessitating immediate and decisive action to address these critical issues.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The failure to assess the project as a whole raises significant concerns regarding the impacts on land use and legal rights. The routing of infrastructure through active croft land introduces potential conflicts, and the application lacks evidence that necessary consents or processes have been initiated. This absence of documentation leads to questions about the deliverability and lawful implementation of the project.

Furthermore, the assessment of onshore infrastructure is materially incomplete, which obscures the true scale of environmental and socio-economic effects. The offshore turbines and onshore works are intrinsically linked, yet they are assessed separately, resulting in a fragmented approach that fails to consider the cumulative effects of the project. By excluding or deferring the assessment of onshore impacts, a proper evaluation of cumulative effects on peatlands, habitats, and communities cannot be

achieved.

The onshore elements involve construction activities such as cabling across protected moorland and the establishment of a substation near Stornoway. These works require excavation across deep peat areas, particularly within Barvas Moor, which is both a significant carbon store and an ecologically sensitive habitat. The application does not provide a comprehensive assessment of these impacts, preventing a full understanding of the project's overall environmental footprint.

There are also considerable risks to sensitive habitats, including machair systems and peatland environments, which are subject to policy protection. The application fails to demonstrate that impacts on these habitats have been fully assessed or that appropriate avoidance measures have been applied, creating a clear evidential gap regarding biodiversity protection.

Additionally, the proposal raises concerns about carbon balance. Disturbance of peatland releases stored carbon, potentially creating a carbon debt that contradicts the objectives of renewable energy development. The application does not adequately address this issue or demonstrate that the overall carbon balance remains beneficial.

From a policy perspective, the separation of project components and the inability to demonstrate protection of peatlands, habitats, and land use interests conflict with the National Marine Plan and National Planning Framework 4. The lack of evidence to show that impacts can be avoided or mitigated undermines the application and highlights its incompleteness and unreliability, ultimately preventing a lawful determination.

TOURISM

The application for the proposed development presents a significant deficiency in its assessment of tourism impacts, neglecting to evaluate the economic and social consequences on a vital sector of the Isle of Lewis economy. Tourism is intrinsically linked to the region's wild coastline, nearly untouched landscapes, dark skies, and overall sense of remoteness. Although the application notes that 86% of visitors are motivated by the scenery, it fails to provide a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contributions of tourism.

Tourism in the area has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, and currently supports more than 1,000 jobs, comprising up to 16% of the island's economy. Nevertheless, the application does not explore how the anticipated industrialisation of the seascape and a decline in environmental quality may affect Tourism Gross Value Added or broader economic resilience. This lack of analysis inhibits the ability to ascertain whether the development would yield a net economic benefit or jeopardise an established and expanding sector.

Furthermore, the application fails to adequately consider the significance of environmental quality in fostering tourism. This includes the essential role of unspoiled

landscapes and dark skies in enhancing visitor experiences, as well as the rising demand for nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment only exacerbates this shortcoming, resulting in a critical gap in understanding the potential impacts on this recognised and growing segment of the local economy.

For an island community with limited economic diversification, the insufficient evaluation of tourism impacts bears broader implications for employment, local businesses, and community sustainability. The lack of a compliant Island Communities Impact Assessment means that these economic vulnerabilities remain unexamined, as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, especially concerning economic impact and the need to illustrate net benefit. It contradicts strategic objectives that designate tourism as a priority growth sector and fails to furnish adequate evidence for the competent authority to evaluate the economic repercussions of the proposal.

Collectively, these shortcomings—including the failure to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and consider the economic dependency of the island—culminate in a significant evidential gap. This gap hampers a thorough assessment of economic effects and leads to the conclusion that the application remains incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally unfit for determination due to significant procedural and substantive shortcomings. There is a clear lack of a comprehensive evidential basis, marked by critical gaps in baseline data and the continued use of an undefined design envelope. The reliance on unspecified mitigation measures, along with the omission of vital impact pathways such as those affecting nocturnal wildlife, onshore infrastructure, and tourism, renders the Environmental Impact Assessment incomplete. This absence of reliable information does not allow for a proper understanding of the likely significant effects or residual impacts.

Moreover, the absence of a compliant Island Communities Impact Assessment breaches statutory duties as outlined in the Islands (Scotland) Act 2018, while the failure to disclose the full Social Impact Assessment constitutes a serious omission. These deficiencies prevent the competent authority from adequately assessing the impacts on community wellbeing, cultural identity, and economic resilience, further underscoring the application’s inadequacies.

The proposal stands in direct opposition to National Planning Framework 4, failing to demonstrate sufficient protection of biodiversity, natural places, and cultural heritage. It does not substantiate that health and wellbeing impacts are acceptable, nor does it provide evidence of a net economic benefit, largely due to the lack of tourism impact

modelling. Additionally, the cumulative impacts of both offshore and onshore elements have not been assessed appropriately, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and could be significant. Incomplete assessments regarding marine ecology, seabirds, protected species, and marine mammals lead to inconsistencies that have not met the evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, preventing any lawful conclusion that impacts may be acceptable.

The proposal would lead to substantial and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, loss of dark skies, and disruption of cultural and visual relationships would result in permanent effects that cannot be mitigated to an acceptable level.

In summary, the extensive deficiencies in information, combined with policy conflicts and unresolved environmental risks, make the application untenable. The competent authority must either refuse consent on these grounds or invoke the 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 be refused in its entirety.

Additional Comments

I object to the constructions of the offshore windfarms

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: 00CEF40B

Member of the public 1128

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

Dear Sir/Madam

This representation serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The objection arises from a detailed examination of the Environmental Impact Assessment Report and accompanying documents, which reveal significant deficiencies in planning, environmental considerations, cultural aspects, and procedural compliance. Situated off the west coast of the Isle of Lewis, an area characterised by its Atlantic-facing coastline and strong cultural heritage, the proposed development raises critical issues regarding its alignment with statutory obligations, national policy, and the fundamental principles of sustainable development.

The application does not present an adequate evidential foundation for a lawful determination. There is a notable absence of essential environmental data, and the baseline information provided is both limited and inconsistent. Several key elements of the proposal remain undefined. Furthermore, the adoption of a flexible design framework obstructs a clear comprehension of the likely significant effects, while the reliance on unspecified mitigation measures precludes an assessment of their potential effectiveness. Consequently, the documentation fails to facilitate a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidential support.

There are pronounced and substantive 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 habitats, cultural heritage, and overall health and wellbeing. It does not adequately demonstrate compliance with national obligations to preserve biodiversity, address climate considerations, and uphold environmental integrity. These discrepancies directly challenge the statutory criteria necessary for consent and hinder the competent authority's capacity to determine the acceptability of the development from a policy perspective.

The unprecedented scale of the proposal, characterised by large turbines positioned in close proximity to the shore, raises substantial concerns about landscape capacity, visual impact, and broader environmental consequences. Collectively, the lack of sufficient information, the reliance on undefined mitigation strategies, the evidential inadequacies, and the clear policy non-compliance indicate that the application is incomplete and unable to support a lawful determination. Under these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The deficiencies within the Environmental Impact Assessment Report are substantial and undermine its reliability, as it fails to provide a full and transparent account of the potential environmental effects associated with the proposal. The introduction of a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations, leads to considerable uncertainty. This uncertainty hinders the application of a worst-case scenario analysis, thereby compromising the integrity of the assessment. As a result, the impacts detailed may not accurately reflect the actual development constructed, limiting both public understanding and the competent authority's ability to grasp the true extent of environmental effects.

Furthermore, the application is heavily dependent on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under these conditions implies that environmental harm will be addressed subsequently, which obstructs meaningful evaluation of the effectiveness of these measures and precludes proper assessment of 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 likely significant effects and mitigation strategies be clearly established before any determination is made.

Additionally, the report is marred by significant evidential deficiencies, including incomplete baseline data, methodological limitations, and reliance on assumptions rather than site-specific evidence. These shortcomings generate uncertainty regarding the scale and significance of impacts, especially in instances where negligible or non-significant effects are posited without adequate supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that is incompatible with statutory requirements.

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

In summary, the combination of an undefined design envelope, the absence of specific mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies hinder a lawful and robust evaluation of environmental effects, placing the competent authority in a position where it cannot make an informed determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The proposal under consideration presents significant shortcomings in the assessment of alternatives, failing to satisfy the statutory obligations of the Environmental Impact Assessment regime. Instead of offering a systematic and reasoned evaluation of realistic alternatives based on their environmental effects, the application merely recounts the project's evolution. This narrative fails to substantiate that less harmful options have been thoroughly identified, evaluated, and chosen over more damaging alternatives.

There is a conspicuous lack of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not illustrate that the developer has genuinely contemplated positioning the turbines further offshore, an action that could potentially mitigate visual, ecological, and coastal impacts. The West Lewis coastline is sensitive, and the critical significance of proximity to the shore in assessing impact underscores the necessity of such analysis. Without it, it is impossible to assert that the proposed siting is the least damaging option available.

Moreover, this inadequacy extends to the routing of cables and the assessment of landfall, where there is insufficient evidence to demonstrate that alternative routes have been adequately investigated to avoid or minimise harm to sensitive receptors, including culturally and spiritually significant locations like Barvas Cemetery. The absence of a clear avoidance strategy alongside a lack of comparative analysis suggests that the principle of mitigation by design has not been appropriately applied, leading to a reliance on post-design mitigation measures instead.

Consequently, the application does not convincingly establish that environmental harm has been minimised through effective site selection, layout, and infrastructure routing. This represents a failure to adhere to the established mitigation hierarchy, hindering the competent authority's ability to determine whether less harmful and more suitable alternatives exist. In the absence of a thorough assessment of alternatives, it cannot be affirmed that the proposal constitutes a sustainable or policy-compliant solution.

From a policy standpoint, these deficiencies seriously undermine adherence to National Planning Framework 4, particularly concerning the safeguarding of natural environments, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment is a significant omission that leads to the conclusion that the application has not been sufficiently assessed and cannot be lawfully approved.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species has significant deficiencies that compromise its reliability and completeness. The West Lewis coastal environment is biologically active and sensitive, yet the baseline data collected is insufficient. The methodologies used do not adequately capture the presence, behaviour, and habitat usage of various species, leading to a lack of sound evidence for assessing potential impacts.

One major oversight is the treatment of otters, which are recognised as a European Protected Species. The application does not properly acknowledge their active use of coastal areas for foraging and movement. Ignoring their core foraging range and behavioural habits means that the assessment fails to evaluate the impacts of construction disturbance, noise, and increased human activity on these animals. This gap undermines any conclusions drawn about the absence of significant effects on otters.

There are also substantial weaknesses in the assessment of basking sharks, where reliance on aerial surveys can lead to significant detection bias, particularly under Atlantic conditions. This methodology likely underrepresents the presence of basking sharks, especially when compared to established land-based observations that indicate frequent utilisation of these waters. The failure to integrate or adequately consider such crucial data further contributes to an incomplete baseline and diminishes the reliability of the conclusions reached.

These methodological flaws result in conclusions regarding negligible or non-significant effects being based on assumptions rather than solid evidence. The lack of adequate baseline data obstructs a proper evaluation of cumulative and indirect impacts, seasonal variations, and the interactions within the wider ecosystem. This adds uncertainty concerning the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to accurately identify and assess protected species. The uncertainty introduced by these deficiencies precludes the possibility of confidently excluding adverse effects, thus invoking the precautionary principle. In light of these issues, granting consent would not be lawful.

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

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

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

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The 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 proposal lacks a comprehensive assessment of social impacts, health, and wellbeing, which is crucial for a lawful evaluation. Despite the developer commissioning a Social Impact Assessment that involved local residents in focus groups, the full report has not been published. This creates a significant evidential gap, hindering both public understanding and the competent authority's ability to grasp the full extent of social risks highlighted by the developer’s own research.

Summaries indicate that residents are facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement and are not speculative in nature. However, the absence of the full assessment limits scrutiny of the findings and constrains the determination of their significance in the decision-making process.

Evidence suggests that the proposal poses a direct threat to community identity and cohesion, with “cultural loss” noted in the developer's findings. Nonetheless, these impacts have not been adequately incorporated into the main application or afforded appropriate consideration. The non-disclosure of the complete Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency directly undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is critical for developments of this magnitude, especially when community character and functioning may be at risk. The failure to provide the full dataset means that the application does not present a complete evidential basis for weighing benefits against harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Development should facilitate positive health outcomes and avoid harm. However, the evidence available indicates existing adverse effects that have not been fully disclosed. Without the complete assessment, compliance with this policy remains unproven.

The procedural implications are significant, as the competent authority cannot 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 regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, seascape, and landscape is significantly flawed and does not reflect the true scale of change or the sensitivity of the environment. The coastline of West Lewis features an open Atlantic horizon and an undeveloped character, contributing to a strong sense of remoteness. The introduction of large-scale turbines near the shoreline would create a continuous industrial presence, fundamentally altering this character and leading to a permanent and irreversible transformation of the landscape.

The application fails to adequately convey the magnitude of this visual change. Due to the scale and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations. This would directly affect visual amenity and undermine the naturalness and remoteness that define the area. The assessment does not accurately reflect this level of impact or its significance within such a sensitive landscape.

There are methodological issues concerning the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly regarding key cultural heritage sites and high-value landscapes. This raises concerns that the visual impact may be understated, thus compromising the reliability of the assessment.

Another critical deficiency is the lack of evaluation regarding the interconnected relationship between landscape, seascape, and cultural heritage. Significant sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape interconnected by visual and spatial relationships with the Atlantic horizon. The assessment treats these as isolated features, failing to acknowledge their interdependence, which leads to an incomplete evaluation of impacts on their setting and cultural significance.

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

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

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

In summary, the assessment does not accurately depict the scale of impact, the sensitivity of the environment, or the interconnected nature of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline is known for its clean coastal waters and significant habitats, both of which are susceptible to disturbance and contamination. The proposal for

substantial seabed preparation and installation works within this high-energy Atlantic environment raises serious concerns, particularly as the assessment of construction and pollution risks is incomplete. The application lacks fully developed Construction Environmental Management Plans and Pollution Prevention Plans, relying instead on undefined mitigation and contingency measures that would be formulated after consent has been granted. This approach hinders any meaningful evaluation of their adequacy or effectiveness.

There is a troubling reliance on future measures that are not yet defined, especially given the sensitivity of the receiving environment. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate details on prevention, control, or monitoring strategies. Additionally, there is uncertainty surrounding the scale and behaviour of sediment plumes that may result 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, leaving potential effects on marine species and habitats inadequately addressed.

The absence of detailed emergency response procedures exacerbates these issues. Deferring contingency planning to a post-consent stage obstructs the assessment of whether sufficient safeguards are in place to handle pollution events. This not only introduces procedural risk but also compromises the ability of the competent authority to evaluate environmental protection measures at the point of determination.

From a regulatory standpoint, the lack of critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. The assessment of likely significant effects and necessary mitigation must occur prior to granting consent, and the absence of such information renders a lawful determination unachievable. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the deficiencies in defined mitigation measures, detailed management plans, and clarity regarding potential impacts contribute to a materially deficient assessment. These shortcomings further underscore the conclusion that the application is incomplete and cannot be appropriately evaluated for construction and pollution risks.

FISHERIES AND MARINE LIFE

The application presents significant deficiencies in its assessment of fisheries and marine life, failing to provide a reliable evaluation of ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and a thriving fishing industry, yet the proposal does not adequately demonstrate that these vital habitats can be preserved without considerable disruption.

One major concern is the unsubstantiated assumption that fishing activity can be displaced without adverse effects. There is no evidence provided to indicate that alternative fishing grounds exist, are accessible, or are capable of accommodating

increased pressure from displaced fishing efforts. This oversight is critical, as the potential for overfishing in other areas poses economic risks for the local fishing fleet. The absence of a thorough, evidence-based assessment means that the implications for fisheries and local livelihoods remain unclear.

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

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

The assessment also overlooks the cumulative impacts resulting from various pressures, such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without a comprehensive evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is fundamentally lacking and does not account for the full range of impacts that arise from this single integrated project. The offshore turbines and the onshore works are inherently connected; however, they are evaluated separately, leading to a disjointed approach that obscures the true scale of environmental and socio-economic consequences.

Included in the onshore elements are cabling that crosses protected moorland, the construction of a substation in proximity to Stornoway, and the necessary access

infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, especially within Barvas Moor, a vital carbon store and ecologically delicate habitat. The application fails to deliver a thorough assessment of these impacts, thus hindering a complete understanding of the project's overall environmental footprint.

By omitting or postponing the assessment of onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively; nevertheless, the division between offshore and onshore elements results in an incomplete understanding of the combined effects on peatlands, habitats, and local communities.

There are significant risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application does not convincingly show that the impacts on these habitats have been fully evaluated or that suitable avoidance measures have been implemented. This presents a distinct evidential gap concerning biodiversity protection.

Furthermore, the routing of infrastructure across active croft land raises concerns about potential conflicts with existing land use and legal rights. The application does not supply evidence that the necessary consents or procedures have been initiated, which casts doubt on the deliverability and lawful implementation of the project.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

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

The tourism sector is fundamentally reliant on the natural assets of the area, including its wild coastline, near-pristine landscape, dark skies, and sense of remoteness. While the application acknowledges that 86% of visitors are attracted by scenery, it fails to

consider the potential impact of industrialising the seascape and the associated loss of environmental quality on Tourism Gross Value Added and the wider economic resilience of the community. Without such critical analysis, it remains unclear whether the proposed development would yield a net economic benefit or harm an already established and growing sector.

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

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

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

In summary, the combined failures to quantify tourism impacts, assess environmental influences on visitor behaviour, and recognise the island's economic dependency culminate in a significant shortfall in the analysis, undermining the robustness of the evaluation of economic effects and leading to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. This application echoes the primary issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was identified. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application does not furnish a complete or reliable evidential basis for determination.

There are significant gaps in baseline data, and the continued use of an undefined design envelope raises concerns. The reliance on unspecified mitigation measures and the omission of critical impact pathways, particularly concerning nocturnal wildlife, full onshore infrastructure, and tourism effects, further undermine the application. As such, the Environmental Impact Assessment is incomplete and fails to provide a

comprehensive understanding of the likely significant effects or residual impacts.

Procedural deficiencies are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory duties under the Islands (Scotland) Act 2018. Additionally, the non-disclosure of the complete Social Impact Assessment represents a material omission, hindering the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience. These shortcomings are substantial enough to render the application unfit for determination.

The proposal conflicts with National Planning Framework 4, failing to protect biodiversity, natural places, and cultural heritage. It does not adequately demonstrate acceptable health and wellbeing impacts or provide evidence of a net economic benefit, particularly due to the absence of tourism impact modelling. The cumulative impacts of both offshore and onshore elements have not been properly evaluated, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also inconsistently presented. The evidential threshold necessary to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and thereby preventing 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, the loss of dark skies, disruption of cultural and visual relationships, and negative impacts on tourism represent permanent effects that cannot be adequately mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The considerable information deficiencies, alongside policy conflicts and unresolved environmental risks, inhibit a lawful and evidence-based decision. Therefore, the competent authority should refuse consent on these grounds or activate the relevant regulatory provisions to mandate the submission of the missing information.

A formal request is therefore made for the refusal of the application for the Spiorad na Mara Offshore Wind Farm in its entirety.

Additional Comments

I am a very frequent visitor to the Isle of Lewis. I am married to a man who grew up in Barvas and we have plans to return. I am very concerned about the impact of this wind farm on the Island. It appears that the assessments and planning are deeply flawed and inadequate in many areas which concerns me greatly for a project of this scale. Cultural heritage, social impacts, ecological, environmental and tourism must be more greatly considered. As we can see from the images provided, these turbines will be an eyesore on the beautiful ocean views. I believe they must be lit at night for

safety. This will impact the dark skies. We have always enjoyed stargazing on clear nights in Lewis, having clear views of the Milky Way and, on occasion, the aurora borealis. With the turbines lit at night that joy will be gone. If wind turbines are a must then they need to go so far off shore that they will not be visible and their impact minimal

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: 6A81009E

Member of the public 1129

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The objection is based on a review of the Environmental Impact Assessment Report and related documents, highlighting various deficiencies in planning, environmental, cultural, and procedural aspects. The development is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise regarding the proposal's compatibility with statutory requirements, national policy, and the principles of sustainable development due to its scale, proximity, and design.

The application lacks an adequate evidential basis for a lawful determination. There is missing critical environmental data, and the baseline information presented is limited and inconsistent. Moreover, key aspects of the proposal remain undefined. The flexible design framework used impedes a clear understanding of likely significant effects. Additionally, reliance on unspecified mitigation measures prevents assessment of their effectiveness. Consequently, the documentation fails to provide a full understanding of environmental, cultural, or community impacts, and assertions of negligible or non-significant effects are not substantiated by robust evidence.

Substantial policy conflicts are evident. The proposal 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. It does not demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. These conflicts directly challenge the statutory tests needed for consent and weaken the ability of the competent authority to conclude that the development meets policy acceptability.

The unprecedented scale of the proposal raises significant concerns, especially with large turbines positioned close to the shoreline, which impacts landscape capacity, visual dominance, and environmental consequences. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. Therefore, the precautionary principle must be applied in these circumstances.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate and does not offer a comprehensive or dependable account of the potential environmental effects associated with the proposal. The application's reliance on a flexible Project Design Envelope, which lacks specific commitments to turbine dimensions, layouts, or configurations, introduces significant uncertainty. This ambiguity undermines the assessment's integrity and may lead to a misrepresentation of the actual impacts of the development, thereby hindering both public understanding and the competent authority's ability to gauge the true extent of the environmental consequences.

Furthermore, the application places considerable emphasis on unestablished mitigation measures, monitoring strategies, and management plans. Seeking consent under the assumption that environmental harm will be resolved later obstructs meaningful evaluation of these measures' effectiveness and the assessment of residual impacts. This deferral of crucial information to post-consent stages contravenes the intended purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies are clearly delineated before any determination is made.

Additionally, the report exhibits serious evidential shortcomings, including insufficient 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 the impacts, particularly where negligible or non-significant effects are asserted without robust supporting evidence. The lack of adequate information hampers a thorough understanding of cumulative and worst-case impacts, generating scientific uncertainty that fails to align with statutory requirements.

Consequently, the application does not satisfy the evidential threshold mandated by the Habitats Regulations, as it does not eliminate adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. The proposal also does not demonstrate adherence to National Planning Framework 4, including standards related to biodiversity protection and environmental integrity, since it cannot prove that impacts have been comprehensively assessed or that suitable safeguards are in place.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The application presents a severely inadequate assessment of marine ecology and protected species within the West Lewis coastal environment, which is both highly sensitive and biologically active. The baseline data provided is incomplete, and the methodologies employed do not effectively capture the presence, behaviour, and

habitat use of key species. Consequently, there is a lack of a reliable evidential basis to evaluate potential impacts.

One significant oversight is the treatment of otters, classified as a European Protected Species. The application does not appropriately recognise their use of coastal areas for foraging and movement. By neglecting to consider their core foraging range and behavioural patterns, it fails to properly assess the potential impacts from construction disturbances, noise, and increased activity. This oversight undermines the conclusions drawn regarding the lack of significant effects on this species.

Additional concerns arise with the assessment of basking sharks. The reliance on aerial surveys introduces a considerable detection bias, particularly under Atlantic conditions. This method is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that show frequent use of these waters. The exclusion or inadequate consideration of such vital data leads to an incomplete baseline, further weakening the reliability of the conclusions made.

These methodological flaws mean that the assertions of negligible or non-significant effects are founded on assumptions rather than solid evidence. The lack of adequate baseline data also hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty about the actual risks to marine species and their habitats.

From a regulatory standpoint, the application does not satisfy the criteria outlined in the Environmental Impact Assessment regime or the National Planning Framework 4, as the identification and assessment of protected species have not been conducted properly. The level of uncertainty involved precludes the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, granting consent would not be lawful.

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

ORNITHOLOGY AND SEABIRD IMPACTS

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

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

The siting of turbines within a recognised migratory corridor poses an additional significant risk, as it effectively creates a barrier in a primary flight path used by birds migrating between the United Kingdom and Iceland. There is an insufficient evaluation of the long-term consequences of sustained mortality in this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, alongside data deficiencies and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This engages the precautionary principle, thwarting a lawful conclusion in favour of consent.

Moreover, the identified deficiencies indicate a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to prove that internationally important seabird populations will not be adversely affected places the proposal in direct contradiction to national policy. Collectively, these weaknesses render the assessment unreliable due to its internal inconsistencies, methodological flaws, and insufficient evidence. These issues obstruct a thorough evaluation of impacts and contribute to the overarching conclusion that the application does not fulfil the statutory requirements necessary for determination.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the assessment of social impacts, health, and wellbeing is a significant concern and undermines the integrity of the evaluation process. The developer commissioned a Social Impact Assessment that involved focus groups with local residents; however, the full report has not been made publicly available. This omission creates a substantial evidential gap, hindering both public understanding and the competent authority's ability to assess the full range of social risks identified through the developer’s own research.

Residents are reportedly experiencing tangible stress, anxiety, and concerns regarding the scale and proximity of the proposal. These impacts are based on direct engagement with the community and are not merely speculative. Nevertheless, the lack of access to

the complete assessment limits the scrutiny of these findings and hampers the ability to gauge their significance in the decision-making process.

Additionally, there is evidence suggesting that the proposal is seen as a threat to community identity and cohesion, with “cultural loss” highlighted in the developer’s own findings. Despite this recognition, these impacts have not been adequately incorporated into the main application or afforded appropriate consideration. The failure to release the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

This lack of transparency further undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially in contexts where community character and function may be at stake. By not providing the complete dataset, the application fails to establish a thorough evidential basis for evaluating the balance of benefits and harms.

From a policy standpoint, the application does not adequately demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Developments are expected to promote positive health outcomes and mitigate harm; however, the evidence currently available points to existing adverse effects that have not been fully disclosed. Without the full assessment, compliance with this policy remains unproven.

The procedural implications of these issues are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a material deficiency in the application and a failure to meet the evidential standards required by the Environmental Impact Assessment framework.

In summary, the non-disclosure of the full Social Impact Assessment, in conjunction with evidence of existing negative impacts, renders the assessment incomplete and unreliable. This situation prevents a lawful determination and reinforces the assertion that the application lacks sufficient information to warrant support.

CONSTRUCTION AND POLLUTION RISKS

The proposal entails significant seabed preparation and installation works within a high-energy Atlantic environment. However, the assessment of construction and pollution risks is incomplete, lacking 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 post-consent, which hinders any meaningful assessment of their adequacy or effectiveness.

This approach is particularly alarming given the sensitivity of the receiving environment along the West Lewis coastline, which is home to clean coastal waters and vital habitats that are vulnerable to sediment disturbance and contamination. Although the

application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide sufficient detail on how these risks will be prevented, controlled, or monitored.

Additionally, uncertainty remains regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also extends to potential effects on sensitive marine species and habitats that have already been identified in the wider 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 adequate safeguards are in place for responding to pollution events. This introduces procedural risks and undermines the ability of the competent authority to assess environmental protection measures at the point of determination.

From a regulatory standpoint, deferring essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be assessed before consent, and the absence of such information makes lawful determination impossible. Furthermore, the application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the shortcomings of undefined mitigation measures, the lack of detailed management plans, and the uncertainty regarding potential impacts result in a materially deficient assessment. These inadequacies prevent a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal presents significant concerns regarding the assessment of fisheries and marine life, which is insufficient and lacks a robust evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the application does not adequately demonstrate how these uses and habitats can be protected or maintained without causing substantial disruption.

A critical issue arises from the assumption that fishing activity can be displaced without consequence. The application fails to provide any evidence that alternative fishing grounds are available, accessible, or capable of accommodating increased pressure. This omission is particularly concerning, as displacement may lead to overfishing in other areas and could have wider economic ramifications for the local fishing fleet. Without a clear and evidence-based assessment, it is impossible to fully understand the impacts on fisheries and livelihoods.

Furthermore, the proposal poses considerable risks to marine species, primarily due to the underwater noise generated during construction. The anticipated high-energy hammer piling, which would occur over an extended period, is likely to cause disturbances over large distances, potentially impacting species like dolphins. The predicted disturbance to a significant proportion of the local bottlenose dolphin population raises serious concerns, yet the application tends to downplay the importance of these effects without sufficient supporting evidence.

There is also an evident inconsistency within the application, acknowledging 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 alarm about compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

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

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

In summary, the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and internal inconsistencies render the assessment incomplete and unreliable. These deficiencies obstruct a comprehensive evaluation of impacts on marine life and fisheries.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which play a crucial role in the area's environmental quality, cultural identity, and tourism value. The proposed development would introduce permanent red aviation lighting that is visible over long distances, creating a continuous and intrusive "wall of light" effect across the western horizon. This alteration would fundamentally change the night-time environment.

There is no assessment of the impact this lighting would have on visual amenity, landscape character, or the experiences of residents and visitors. Such an omission is particularly significant given the importance of dark skies to the identity of the area and to emerging sectors like astro-tourism. The failure to consider these impacts reveals a clear gap in the overall landscape and environmental assessment.

Equally concerning is the lack of evaluation regarding the impacts on nocturnal wildlife.

Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are highly sensitive to artificial lighting due to phototaxis, which can result in disorientation and increased collision risks. The application lacks a lighting impact assessment or phototaxis study and thus fails to evaluate how the proposed aviation lighting may affect these species or raise mortality rates.

Furthermore, the reliance on daytime survey data in the ornithological assessment neglects nocturnal activity and associated risks. For instance, species like 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 of the proposal.

Without an assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would suffer adverse effects. The evidential standard necessary to rule out adverse effects beyond reasonable scientific doubt cannot be achieved, thus invoking the precautionary principle and preventing 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 undermines the wider assessment of landscape and seascape impacts, as night-time character is an integral aspect of the environment.

Overall, the lack of any 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 assessment of tourism impacts lacks essential evaluation, overlooking the economic and social ramifications for a crucial sector of the Isle of Lewis economy. The tourism industry relies heavily on the area's unspoilt landscapes, wild coastline, dark skies, and overall sense of remoteness. Although the application states that 86% of visitors are attracted by the scenery, it fails to provide a quantified analysis of how large-scale offshore infrastructure might alter visitor numbers, behaviour, or their overall economic contribution.

Since 2017, tourism has seen notable growth, rising from £65 million to over £81.5 million and supporting more than 1,000 jobs while constituting up to 16% of the island's economy. However, the application does not assess how the industrialisation of the seascape and the subsequent loss of environmental quality would impact Tourism Gross Value Added or the broader economic resilience of the area. Without this critical analysis, it remains unclear whether the proposed development would yield a net economic benefit or jeopardise a vital and expanding sector.

Moreover, the assessment neglects to consider the significance of environmental quality in attracting tourists, including the role of unspoiled landscapes and dark skies in enhancing visitor experiences. This is particularly relevant for emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this oversight, creating a significant gap in understanding the effects on a recognised and developing facet of the local economy.

Given the context of an island community with limited economic diversification, the neglect to evaluate tourism impacts carries broader implications for employment opportunities, local businesses, and community sustainability. The absence of a proper Island Communities Impact Assessment means these economic vulnerabilities have not been examined as stipulated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not adequately illustrate compliance with National Planning Framework 4, especially concerning economic impact 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 to enable the competent authority to assess the economic ramifications of the proposal.

In summary, the cumulative failure to quantify tourism impacts, evaluate the environmental factors that influence visitor behaviour, and acknowledge the island's economic reliance culminates in a substantial evidential gap. This deficiency hampers a thorough evaluation of the economic effects and leads to the conclusion that the application remains 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

I have relatives in Braga who will be able to see and hear these wind turbines once functioning and as a result their quality of life will be directly affected. An area of great natural beauty will be blighted. Sea birds will be decimated.Pollution to the environment is inevitable.

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: FDF15C1A

Member of the public 1130

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

Dear Sir/Madam

This objection serves as a formal challenge to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. A thorough examination of the Environmental Impact Assessment Report and accompanying documents reveals significant deficiencies across planning, environmental, cultural, and procedural dimensions. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, relatively untouched environment, and robust cultural identity. There are fundamental concerns regarding the proposal's alignment with statutory obligations, national policy, and the principles underpinning sustainable development, particularly due to its unprecedented scale, proximity to the shore, and design.

The application is deficient in providing a sound evidential basis necessary for a lawful determination. It lacks critical environmental data, offers limited and inconsistent baseline information, and leaves essential elements of the proposal undefined. The flexible design framework employed does not facilitate a clear assessment of potential significant effects, while the reliance on unspecified mitigation measures raises questions about their effectiveness. Consequently, the documentation does not furnish a comprehensive understanding of the potential impacts on the environment, culture, or community, and claims of negligible or non-significant effects lack robust support.

There are substantive conflicts with established policy frameworks. 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 habitats, cultural heritage, and health and wellbeing. It fails to demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These discrepancies are critical as they directly relate to the statutory tests required for consent and hinder the competent authority’s ability to determine the proposal's acceptability in policy terms.

The unprecedented scale of the proposal, particularly the positioning of large turbines in close proximity to the coastline, raises significant concerns about landscape capacity, visual impact, and overall environmental effects. Taken together, the lack of adequate information, dependence on undefined mitigation measures, evidential shortcomings, and clear non-compliance with policy indicate that the application is incomplete and cannot support a lawful determination. Therefore, it is imperative that the precautionary principle is invoked in this context.

MARINE ECOLOGY AND PROTECTED SPECIES

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

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

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

The methodological flaws result in conclusions of negligible or non-significant effects being based on assumptions rather than solid evidence. The lack of adequate baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This leads to uncertainty regarding the actual risks to marine species and habitats.

From a regulatory standpoint, the application does not comply with the Environmental Impact Assessment requirements or the National Planning Framework 4, as it has not properly identified or assessed protected species. The uncertainty introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt and necessitates the application of the precautionary principle. In light of this, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development raises serious concerns due to its fundamental contradictions and methodological weaknesses. It fails to provide adequate evidence regarding the impact on internationally important seabird populations found along the west coast of the Isle of Lewis, many of which are already experiencing decline. The application does not convincingly demonstrate that these

species will remain unaffected, particularly given the site's location within key foraging areas and migratory pathways.

There is a significant lack of robust evaluation concerning crucial issues such as displacement, collision risk, and habitat loss. Moreover, the developer's assertion of no significant adverse effects contradicts the simultaneous argument for a Habitats Regulations derogation case, which is only warranted if significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment and suggests that its conclusions are unsupported by sound evidence.

The methodologies utilised in the assessment appear to underestimate potential mortality rates, especially for species like Kittiwakes and Fulmars that are already in severe decline. The assessment also fails to appropriately consider the implications of placing turbines in a recognised migratory corridor, effectively creating barriers for species that migrate between the United Kingdom and Iceland. The long-term consequences of sustained mortality in this corridor, particularly for species with relatively small global populations, have not been adequately addressed.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to assert that there will be no adverse effect on the integrity of protected sites. Data gaps, contradictory conclusions, and limitations in the modelling approach indicate that the standard of beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and hindering a lawful conclusion in favour of consent.

These deficiencies also represent a failure to comply with National Planning Framework 4, particularly regarding biodiversity protection and the safeguarding of natural assets. The inability to show that internationally significant seabird populations will not be adversely affected places the proposal in direct conflict with national policy. Overall, the assessment is unreliable, marked by internal inconsistencies and a lack of sufficient evidence, which undermines the ability to accurately evaluate impacts and concludes that the application does not meet the statutory requirements needed for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development presents significant shortcomings in its assessment of cultural heritage and community identity, particularly regarding the West Lewis coastline, which should be viewed as a living cultural landscape intertwined with environment, language, tradition, and community. The application adopts a narrow perspective, treating heritage as disconnected, static elements rather than recognising their dynamic social, cultural, and spiritual roles in the community.

A notable oversight is the categorisation of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active burial and spiritual spaces, yet they are considered static features in the assessment. This approach neglects their ongoing use, significance, and the implications of development

on their surroundings. Consequently, this mischaracterisation leads to an inadequate evaluation of cultural impacts and dismisses their importance in community life.

Furthermore, the assessment lacks attention to intangible cultural heritage, including the Gaelic language, local traditions, and the enduring connection between the community and the coastal environment. These aspects are vital to the area's identity, yet they are wholly absent from the evaluation, resulting in a substantial omission. The absence of these considerations hinders a comprehensive understanding of the cultural impact associated with the development.

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

Moreover, there is a critical procedural failure due to the omission of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community, rendering the determination unlawful.

These deficiencies also conflict with policy frameworks, particularly National Planning Framework 4, which emphasises the protection of historic assets and places. The failure to consider both tangible and intangible heritage and to acknowledge ongoing cultural practices signifies a clear deviation from policy requirements.

Collectively, the neglect to assess living heritage, intangible cultural values, community rights, and compliance with statutory obligations results in a substantial evidential gap. The cultural impacts of the proposed development have not been adequately addressed, and the application does not furnish a sufficient foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's commissioning of a Social Impact Assessment, which included focus groups with local residents, has resulted in a significant evidential gap due to the non-publication of the full report. This lack of transparency impedes both public understanding and the competent authority's ability to assess the social risks highlighted in the developer's own research. Available summaries indicate that local residents are already experiencing measurable stress, anxiety, and concern related to the scale and proximity of the proposal. These impacts stem from direct engagement with the community and should not be considered speculative. However, the omission of the complete assessment restricts scrutiny of the findings and diminishes the capacity to evaluate their significance in the decision-making process.

Moreover, the proposal appears to pose a direct threat to community identity and cohesion, as evidenced by the developer's acknowledgment of "cultural loss." Despite this recognition, these social impacts have not been adequately incorporated into the main application or given sufficient weight. The failure to disclose the full Social Impact Assessment obscures the true human and social costs associated with the development. This lack of transparency compromises the Environmental Impact Assessment process, as a comprehensive understanding of social, economic, and health impacts is crucial for projects of this scale, particularly those that may affect community character and functioning.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 regarding health and wellbeing. It is essential that developments support positive health outcomes and mitigate harm. However, the existing evidence indicates adverse effects that have not been fully communicated. Without access to the complete assessment, it is impossible to ascertain compliance with this policy.

The implications of these procedural oversights are substantial. The competent authority is unable to conduct 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 requirements set forth by the Environmental Impact Assessment regime. Collectively, the non-disclosure of the full Social Impact Assessment, alongside documented existing adverse impacts, leads to an incomplete and unreliable assessment. This situation hinders lawful determination and underscores the inadequacy of the information supporting the application.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. The introduction of large-scale turbines in close proximity to the shoreline would result in a continuous and dominant industrial presence, fundamentally altering this character and leading to a permanent and irreversible transformation of the landscape. The assessment of seascape, landscape, and visual impacts is materially deficient, failing to adequately reflect the scale of change or the sensitivity of the receiving environment.

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

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

visual impact has been understated, undermining the assessment's reliability.

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

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal involves substantial seabed preparation and installation works within a high-energy Atlantic environment, yet the assessment of construction and pollution risks is incomplete. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application relies on mitigation and contingency measures that are to be prepared post-consent, which prevents any meaningful assessment of their adequacy or effectiveness.

The absence of detailed emergency response procedures exacerbates these concerns. By deferring contingency planning to a post-consent stage, the application obstructs 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.

The application acknowledges risks such as sediment mobilisation and accidental

chemical or oil spills, yet it does not provide sufficient detail on how these will be prevented, controlled, or monitored. There is uncertainty regarding the scale and behaviour of sediment plumes arising 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 extends to potential effects on marine species and habitats that have already been identified as sensitive within the wider assessment.

The 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. Taken together, the absence of defined mitigation measures, the lack of detailed management plans, and the uncertainty regarding potential impacts render the assessment materially deficient. These shortcomings prevent a robust evaluation of construction and pollution risks and further support the conclusion that the application is incomplete.

From a regulatory perspective, the deferral of critical environmental safeguards conflicts with the requirements of the Environmental Impact Assessment regime. Likely significant effects and mitigation must be assessed prior to consent, and where such information is missing, a lawful determination cannot be made. The application also fails to demonstrate compliance with policy requirements relating to environmental protection and water quality.

FISHERIES AND MARINE LIFE

The proposal presents significant shortcomings in its assessment of marine life and fisheries, leading to an incomplete understanding of ecological and socio-economic implications. The waters off the West Lewis coast are known for both their rich marine ecosystem and an active fishing industry. However, the application fails to adequately demonstrate that these essential uses and habitats will be safeguarded against substantial disruption.

A critical concern arises from the unfounded assumption that fishing activities can be relocated without adverse effects. There is no evidence provided that alternative fishing grounds exist or can support the increased pressure that displacement would entail. This lack of information is crucial, as such displacement poses a risk of overfishing in other areas and could have broader economic repercussions for the local fishing fleet. Without a thorough, evidence-based assessment, the potential impacts on fisheries and local livelihoods remain unclear.

Moreover, the proposal poses significant risks to marine species, particularly due to the underwater noise produced during construction. The high-energy hammer piling expected over an extended period is likely to disturb a wide area, negatively affecting species such as dolphins. The anticipated disturbance to a considerable portion of the local bottlenose dolphin population raises substantial concerns, yet the application seems to minimise these impacts without adequate supporting data.

Additionally, the application demonstrates a notable inconsistency in its acknowledgment of the need for licences to permit harm to European Protected Species while simultaneously claiming that these impacts are negligible. This contradiction undermines the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially in situations where harm is expected to necessitate legal authorisation.

The failure to consider cumulative impacts from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities, further complicates the assessment. Without a thorough evaluation of these interconnected effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not satisfy the requirements set forth in the National Planning Framework 4 or the National Marine Plan. It does not establish that the development can coexist with current marine users or avert unacceptable impacts on marine biodiversity, hindering any conclusion that the proposal aligns with sustainable development principles.

In summary, the deficiencies in the evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal contradictions within the application render the assessment incomplete and unreliable. These issues obstruct a comprehensive evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal includes significant infrastructure developments such as cabling across protected moorland and the construction of a substation near Stornoway, with access routes traversing sensitive landscapes. These operations involve excavation in areas of deep peat, particularly within Barvas Moor, which is an important carbon store and ecologically delicate habitat. However, the application fails to provide a comprehensive assessment of the impacts on these crucial environments, limiting our understanding of the project's overall environmental footprint.

The separation of the offshore turbines and onshore works is a critical flaw, as these components are intrinsically linked yet assessed independently. This fragmented approach obscures the true scale of the environmental and socio-economic effects that arise from the project, preventing a thorough evaluation of cumulative impacts. The Environmental Impact Assessment process mandates that all elements of a project be considered collectively, but this is not the case here. Consequently, the combined impacts on peatlands, habitats, and local communities are inadequately understood.

In addition to this, the application does not convincingly demonstrate that the impacts on sensitive habitats, including machair systems and peatland environments that are subject to policy protection, have been thoroughly assessed. It raises evident gaps in relation to biodiversity protection, indicating a lack of appropriate avoidance measures.

Concerns also arise regarding the carbon balance due to the disturbance of peatland, which can release stored carbon and create a carbon debt, contradicting the objectives of renewable energy development. Unfortunately, the application does not sufficiently address this matter or prove that the overall carbon balance remains beneficial.

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

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

Taken as a whole, the separation of project components, the lack of a comprehensive assessment, and the insufficient evidence regarding environmental and land use impacts result in an incomplete and unreliable application, thereby hindering 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 fundamentally inadequate and does not address the economic and social ramifications for a vital sector of the Isle of Lewis economy. This sector relies heavily on the region's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness. While the application acknowledges that 86% of visitors are attracted by scenery, it does not provide any quantitative assessment regarding how large-scale offshore infrastructure might influence visitor numbers, behaviours, or overall economic contributions.

Tourism has experienced considerable growth, escalating from £65 million in 2017 to over £81.5 million, and it now supports more than 1,000 jobs, accounting for up to 16% of the island's economy. However, the application fails to model the potential effects of seascape industrialisation and the degradation of environmental quality on Tourism Gross Value Added or broader economic resilience. Without this critical analysis, it remains uncertain whether the development would yield a net economic advantage or detract from a well-established and expanding sector.

Moreover, the assessment neglects to consider the significance of environmental quality in bolstering tourism, particularly regarding the vital role of unspoiled landscapes and dark skies in enhancing visitor experiences and fostering emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortcoming, creating a considerable gap in understanding the impacts on an acknowledged and burgeoning segment of the local economy.

In an island community with limited economic diversification, the oversight in evaluating tourism impacts has broader consequences for employment, local businesses, and community sustainability. The lack of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been adequately examined as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, particularly regarding economic impact and the necessity to illustrate net benefits. It is also at odds with strategic objectives that recognise tourism as a priority growth sector and fails to provide sufficient evidence for the competent authority to assess the economic implications of the proposal.

In summary, the failure to quantify tourism impacts, evaluate environmental factors influencing visitor behaviour, and consider the economic dependence of the island leads to a significant evidential gap. This gap hinders a thorough assessment of economic effects and contributes to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements for sustainable development when examined against statutory duties, national policy, and evidential standards. This application revisits the core issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. The current application, despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, still falls short.

Critical gaps in baseline data render the evidential basis for determination incomplete and unreliable. The application relies on an undefined design envelope and unspecified mitigation measures, and it fails to address key impact pathways, including those related to nocturnal wildlife, full onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment lacks completeness and does not facilitate a comprehensive understanding of likely significant effects or residual impacts.

Moreover, there are evident procedural shortcomings. The lack of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty as outlined in the Islands (Scotland) Act 2018. Additionally, the failure to disclose the 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, making the application unfit for determination.

The proposal is in direct conflict with National Planning Framework 4, as it fails to protect 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 lack of tourism impact modelling.

Furthermore, the cumulative impact of both offshore and onshore elements has not been properly evaluated, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainty surrounds environmental risks, which could be significant. Incomplete assessments concerning marine ecology, seabirds, protected species, and marine mammals reveal internal inconsistencies. The evidential threshold required to exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and obstructing a lawful conclusion regarding acceptable impacts.

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

Collectively, these factors indicate that the application is procedurally and substantively unfit for determination. The extensive deficiencies in information, in conjunction with policy conflicts and unresolved environmental risks, impede a lawful and evidence-based decision. The competent authority should refuse consent based on these grounds or utilise the relevant regulatory provisions to mandate the submission of the missing information.

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

Additional Comments

It is unbelievable that the proposal of such a blot on our landscape could have ever reached this point, with those in power of such decisions ignoring the colossal impact on the island.

I was born and brought up on Lewis and still choose to spend most of my holidays with my family there. One of the main draws is always the big skies and forever horizons around the island. It is heartbreaking to think that these precious places of such rugged, undisturbed beauty that have been the backdrop to island life for centuries, could be treated with such disregard.

Please consider this from the perspective of those living there, as well as the many tourists who flock to the islands for a taste of a different way of life.

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: 7EB173FA

Member of the public 1131

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. A thorough examination of the Environmental Impact Assessment Report and its supporting documents has revealed significant deficiencies in planning, environmental considerations, cultural impacts, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its stunning Atlantic-facing coastline, near-pristine surroundings, and rich cultural heritage. The design, scale, and proximity of the wind farm raise profound questions about its alignment with statutory obligations, national policy, and the principles governing sustainable development.

Fundamentally, the application lacks a sufficient evidential foundation for a lawful decision. Key environmental data is notably absent, and the baseline information provided is limited and inconsistent. Moreover, crucial elements of the proposal remain undefined. The flexible design framework employed hinders a clear assessment of potential significant effects, and the reliance on unspecified mitigation measures prevents a proper evaluation of their effectiveness. Consequently, the documentation fails to offer a comprehensive understanding of the environmental, cultural, or community implications, leaving claims of negligible or non-significant effects unsupported by solid evidence.

There are evident and serious conflicts with established policies. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment requirements, or National Planning Framework 4, especially concerning biodiversity, natural habitats, cultural heritage, and public health and wellbeing. It does not prove that it can meet national obligations to safeguard biodiversity, address climate issues, and maintain environmental integrity. These discrepancies directly challenge the statutory requirements for consent and weaken the authority's capacity to deem the development acceptable from a policy perspective.

The unprecedented scale of this proposal raises additional concerns, particularly with the large turbines being sited in close proximity to the shoreline. This introduces significant worries about landscape capacity, visual impact, and broader environmental ramifications. Collectively, the insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy violations illustrate that the application is incomplete and unable to support a lawful decision. In light of these circumstances, it is imperative that the precautionary principle is invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and does not give a complete or clear account of the likely environmental effects of the proposed development. The use of a flexible Project Design Envelope, which lacks specific details on turbine dimensions, layouts, or configurations, creates substantial uncertainty. This situation undermines the assessment's credibility and leads to a failure in accurately presenting the impacts, preventing both the public and the competent authority from grasping the true environmental consequences.

The application places heavy reliance on mitigation measures, monitoring strategies, and management plans that are not yet defined. Seeking consent on the premise that environmental harm will be managed later hinders any substantial evaluation of effectiveness or understanding of residual impacts. This approach of deferring critical information to post-consent stages is procedurally unacceptable and contradicts the aims of the Environmental Impact Assessment regime, which demands that significant effects and mitigation are clearly identified prior to determination.

Significant evidential gaps are present, such as missing baseline data, limitations in methodology, and the use of assumptions instead of site-specific evidence. These issues lead to uncertainty regarding the extent and significance of impacts, especially where conclusions regarding negligible or non-significant effects are made without adequate supporting data. The lack of sufficient information obstructs a clear comprehension of cumulative and worst-case impacts, introducing scientific uncertainty that conflicts with statutory requirements.

Consequently, the application does not meet the evidential standard required under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal fails to comply with National Planning Framework 4, including obligations relating to 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, a lack of specified mitigation, and gaps in baseline data makes the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies hinder a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make an informed decision based on the available information.

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 evaluation of marine ecology and protected species is fundamentally inadequate, failing to provide a thorough and reliable understanding of ecological receptors in the West Lewis coastal area. This marine environment is both sensitive and biologically vibrant, yet the baseline data is incomplete. The methodologies employed do not effectively capture the presence, behaviour, and habitat utilisation of species. Consequently, the assessment does not establish a robust evidential basis for assessing potential impacts.

One significant oversight pertains to otters, a species protected under European law. The application does not appropriately acknowledge or assess their active utilisation of coastal regions for foraging and movement. The absence of an evaluation of their core foraging range and behavioural patterns indicates that the potential impacts of construction disturbance, noise, and increased activity have not been sufficiently analysed. This gap undermines any assertions regarding the absence of significant effects on the otter population.

Deficiencies also arise in the assessment of basking sharks. The reliance on aerial surveys introduces a considerable detection bias, particularly under Atlantic conditions. This methodology is likely to underestimate their presence, especially when compared to established land-based observations that indicate frequent activity in these waters. The failure to incorporate or adequately consider such data contributes

to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological flaws result in conclusions of negligible or non-significant effects being based on assumptions rather than solid evidence. Furthermore, the lack of adequate baseline data inhibits a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This introduces uncertainty regarding the actual level of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the stipulations of the Environmental Impact Assessment regime and National Planning Framework 4, as the identification and assessment of protected species have not been conducted thoroughly. The level of uncertainty presented hampers the exclusion of adverse effects beyond reasonable scientific doubt, thereby 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 unfounded conclusions undermines the reliability of the assessment. These deficiencies obstruct a comprehensive 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 is fraught with significant flaws regarding its ornithological assessment, which is riddled with gaps in evidence and internal inconsistencies that undermine its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already experiencing decline. However, the application does not demonstrate to the required evidential standard that these species will not suffer adverse effects. Key foraging areas and migratory pathways are within the development's location, yet the assessment fails to thoroughly evaluate the implications of displacement, collision risk, or habitat loss.

A notable contradiction arises within the application, where the developer claims there are no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only necessitated where significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment and suggests that the conclusions drawn are unsupported by the underlying evidence. Additionally, the assessment lacks sufficient evidence that seabirds associated with protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. The critical nature of these feeding grounds is not fully recognised, and the reliance on modelling approaches introduces uncertainty, particularly concerning species like Kittiwakes and Fulmars, which are in severe decline. The methodologies employed likely underestimate mortality rates, particularly when baseline data is incomplete and behavioural responses are not adequately understood.

The placement of turbines within a recognised migratory corridor adds another layer of

significant risk, effectively creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not adequately assess the long-term consequences of sustained mortality in this corridor or the potential effects on species with relatively small global populations.

From a regulatory standpoint, the application does not fulfil the evidential threshold required to conclude no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and precludes a lawful conclusion in favour of consent. Furthermore, the identified deficiencies signify non-compliance with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to prove that internationally important seabird populations will not be adversely affected places the proposal at odds with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The 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 proposal currently under consideration demonstrates significant deficiencies in the assessment of social impacts, health, and wellbeing. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents. However, the absence of the full report is a major evidential gap that hinders both public understanding and the authority's ability to grasp the extent of social risks identified by the developer’s own research.

Residents have reported experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal, as shown through direct engagement. The lack of access to the complete assessment obstructs proper scrutiny of these findings, thus limiting the capacity to ascertain their importance in the decision-making process. Furthermore, the proposal is perceived as a threat to community identity and cohesion, with indications of “cultural loss” emerging from the developer's findings. Despite this, such impacts have not been adequately considered in the main application or given the necessary weight. The failure to release the full Social Impact Assessment conceals the actual human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health impacts is critical for developments of this magnitude, particularly when community character and functionality may be at risk. By withholding the complete dataset, the application does not provide a comprehensive evidential basis necessary for weighing benefits against harm.

From a policy standpoint, the application falls short of demonstrating adherence to National Planning Framework 4 concerning health and wellbeing. Developments are

expected to promote positive health outcomes and prevent harm, yet the evidence available reveals existing adverse effects that remain undisclosed. Without the full assessment, it is impossible to affirm compliance with this policy.

The procedural ramifications are considerable. The competent authority is unable to carry out a robust socio-economic and health evaluation due to the lack of access to the complete Social Impact Assessment. This represents a material omission within the application and fails to satisfy the evidential requirements set forth by the Environmental Impact Assessment regime.

Overall, the non-disclosure of the full Social Impact Assessment, along with the evidence of existing adverse impacts, results in an incomplete and unreliable evaluation. This situation obstructs a lawful determination and reinforces the conclusion that the application is not backed by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. The proposed large-scale turbines would be situated in close proximity to the shoreline, introducing a continuous industrial presence that would fundamentally alter this character. This change would result in a permanent and irreversible transformation of the landscape.

The application fails to properly assess 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 diminishing the natural and remote qualities of the area. The assessment does not adequately convey the significance of these impacts on such a sensitive landscape.

There are also concerns regarding the methods used to select and present visual viewpoints. Evidence indicates that these viewpoints may not fully capture the most sensitive receptors or the worst-case scenarios, particularly regarding important cultural heritage sites and high-value landscapes. This may lead to an understatement of the visual impact, calling into question the reliability of the assessment.

Moreover, the assessment neglects to consider the interconnected relationship between landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape that is visually and spatially linked to the Atlantic horizon. By treating these assets as isolated, the assessment fails to recognise their interdependence, resulting in an incomplete evaluation of their cultural significance and setting.

The proposed industrialisation of the seascape would sever these vital connections, altering how heritage assets are experienced and disrupting their relationship with the natural horizon. This would not only create a visual impact but also a broader cultural and spatial harm that has not been sufficiently evaluated in the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, which aims to protect natural places and historic assets. The scale of change proposed is incompatible with safeguarding the landscape character, visual amenity, and the setting of culturally significant sites. The lack of a comprehensive worst-case assessment further undermines any claims of policy compliance.

Additionally, the identified impacts cannot be effectively mitigated. Given the size, height, and proximity of the turbines, their presence would be dominant and unavoidable. This change is fundamental and permanent, and cannot be reduced to an acceptable level through mitigation efforts.

In summary, the assessment does not accurately reflect the scale of the impact, the sensitivity of the environment, or the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and support the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal entails extensive seabed preparation and installation works in a high-energy Atlantic environment, yet it lacks comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. This deficiency is alarming, particularly given that the application depends on future mitigation and contingency measures, which are to be formulated post-consent. Such an approach does not allow for a thorough assessment of their adequacy or effectiveness.

The environmental context is crucial; the West Lewis coastline is home to clean coastal waters and significant habitats that are sensitive to sediment disturbance and contamination. Although the application acknowledges risks like sediment mobilisation and the possibility of accidental chemical or oil spills, it fails to provide adequate details on how these issues will be prevented, controlled, or monitored effectively.

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 raises concerns about potential effects on marine species and habitats that have already been identified as vulnerable in the wider assessment.

The situation is further exacerbated by the lack of detailed emergency response procedures. By postponing contingency planning until after consent has been granted, the application obstructs the evaluation of whether suitable safeguards are in place 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, 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 strategies be assessed prior to consent, as the absence of such information renders a lawful determination unfeasible. The application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the combination of undefined mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts significantly undermines the 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 application presents a concerning lack of evidence regarding the potential displacement of fishing activity. It assumes that such displacement can occur without negative consequences, yet it fails to establish whether alternative fishing grounds are available, accessible, or capable of accommodating the increased pressure. This oversight is critical, as the risk of overfishing in other areas poses a threat not only to marine life but also to the economic stability of the local fishing fleet. The implications for fisheries and livelihoods remain inadequately addressed, leaving serious questions about the long-term sustainability of these practices.

Moreover, the risks posed to marine species, particularly from underwater noise during construction, are alarmingly understated. The use of high-energy hammer piling is anticipated to generate disturbances over considerable distances, which may adversely affect species such as dolphins. The anticipated impact on a significant portion of the local bottlenose dolphin population raises profound concerns, yet the application minimizes these effects without providing compelling supporting evidence.

There is a notable inconsistency within the application itself, where it acknowledges the need for licences to permit harm to European Protected Species, while simultaneously asserting that the impacts are negligible. This contradiction not only undermines the credibility of the assessment but also raises significant doubts about compliance with the Habitats Regulations, particularly in scenarios where anticipated harm would necessitate legal authorisation.

Additionally, the assessment does not adequately address the cumulative impacts arising from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these interconnected effects, it is impossible to gauge the overall impact on marine ecosystems and socio-economic conditions effectively.

From a policy standpoint, the application fails to demonstrate alignment with the National Planning Framework 4 or the National Marine Plan. It does not provide sufficient evidence that the development can coexist harmoniously with current marine users or that it can avert unacceptable impacts on marine biodiversity, which are essential for concluding that the proposal aligns with the principles of sustainable

development.

In summary, the glaring deficiencies regarding fishing displacement, the minimisation of acoustic impacts, and the internal contradictions within the application render the assessment both incomplete and unreliable. These issues critically hinder any reliable evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is incomplete and fails to address the full extent of impacts from what constitutes a single integrated project. The offshore turbines and the onshore works are intrinsically linked; however, they are assessed separately, leading to a fragmented approach that obscures the true scale of environmental and socio-economic effects.

The onshore components involve cabling across protected moorland, the construction of a substation near Stornoway, and the associated access infrastructure traversing sensitive landscapes. This construction includes excavation in areas of deep peat, especially within Barvas Moor, which serves as a significant carbon store and ecologically sensitive habitat. The application does not present a comprehensive assessment of these impacts, which hinders the understanding of the project's overall environmental footprint.

By not adequately assessing onshore impacts, the application fails to allow for a proper evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all aspects of a project must be considered collectively. Nonetheless, the separation of offshore and onshore components means the combined impacts on peatlands, habitats, and communities remain poorly understood.

Furthermore, there are significant risks posed to sensitive habitats, such as machair systems and peatland environments, which benefit from policy protection. The application does not prove that these habitat impacts have been thoroughly assessed or that appropriate avoidance measures have been implemented, creating a clear evidential gap regarding biodiversity protection.

Concerns also arise regarding the carbon balance, as the disturbance of peatland can release stored carbon, potentially creating a carbon debt that contradicts the goals of renewable energy development. The application fails to sufficiently address this matter or to show that the overall carbon balance is advantageous.

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

From a policy perspective, the inability to assess the project as a whole and demonstrate the protection of peatlands, habitats, and land use interests conflicts 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.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding dark skies and nocturnal wildlife stands out as a critical shortfall in the Environmental Impact Assessment. The West Lewis coastline boasts exceptionally dark skies, which play a vital role in defining the area's environmental quality, cultural identity, and tourism potential. The proposal's introduction of permanent red aviation lighting, which would be visible over extensive distances, threatens to create an intrusive “wall of light” effect across the western horizon, fundamentally changing the night-time landscape.

Moreover, the application fails to consider how this lighting will impact visual amenity, landscape character, and the overall experience of both residents and visitors. This oversight is particularly concerning given the significance of dark skies for the region’s identity and the emerging tourism sector focused on astro-tourism. As a result, the assessment presents a stark gap in the overall evaluation of the landscape and environmental effects.

The lack of evaluation extends to nocturnal wildlife, with no assessment provided for species such as the Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel, all of which are highly sensitive to artificial lighting. This failure to address the potential risks, including disorientation and increased mortality due to collision, is troubling. Furthermore, the ornithological assessment's dependence on daytime survey data fails to account for nocturnal activities and the associated dangers. Species like Kittiwakes, which may forage or migrate at night, remain vulnerable to disorientation from artificial lighting, yet this risk has gone unexamined. The absence of site-specific night-time data leaves a critical void in understanding the ecological implications.

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

From a policy standpoint, these omissions clash with National Planning Framework 4, particularly concerning the safeguarding of natural areas and the quality of the environment. Additionally, this neglect undermines the broader analysis of landscape and seascape impacts, as the character of the night-time environment is integral to the overall ecosystem.

Collectively, the absence of any evaluation related to dark skies and nocturnal wildlife signifies a substantial evidential gap. The lack of baseline data, impact modelling, and species-specific analysis renders the application incomplete and unfit for supporting a lawful determination.

TOURISM

The proposal fails to adequately assess the impacts on tourism, a vital component of the Isle of Lewis economy. Tourism, which has seen a substantial increase from £65 million in 2017 to over £81.5 million, supports more than 1,000 jobs and constitutes up to 16% of the island's economy. The application acknowledges that 86% of visitors are attracted to the scenery yet does not provide a quantified evaluation of how large-scale offshore infrastructure could influence visitor numbers, behaviour, or economic contributions.

Furthermore, there is a notable deficiency in understanding the significance of environmental quality in supporting tourism, particularly the value of unspoiled landscapes and dark skies. These elements are crucial for enhancing visitor experiences and have relevance for emerging markets such as nature-based tourism and astro-tourism. The omission of a Dark Skies Assessment deepens this gap, leaving key impacts on a recognised and growing segment of the local economy unexamined.

The implications of failing to assess tourism impacts extend beyond the economic sphere, affecting employment opportunities, local businesses, and community sustainability in an island community with limited economic diversification. The lack of a compliant Island Communities Impact Assessment means that these vulnerabilities have not been addressed 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 impacts and the necessity to illustrate net benefit. Additionally, it contradicts strategic goals that prioritise tourism as a growth sector and fails to provide sufficient evidence for the competent authority to evaluate the economic consequences of the proposal.

Overall, the combination of unquantified tourism impacts, inadequate assessment of environmental influences on visitor behaviour, and a disregard for the island's economic dependencies creates a significant evidential gap. This gap obstructs a thorough evaluation of economic effects and leads to the conclusion that the application remains incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm raises serious concerns regarding its compliance with sustainable development principles when evaluated against statutory obligations, national policy, and evidential requirements. It mirrors the fundamental issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was identified. This current

proposal, despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, fails to adequately address these critical issues.

There are significant shortcomings in the evidential basis for the application. It lacks comprehensive baseline data, utilises an undefined design envelope, and relies on unspecified mitigation measures. Key impact pathways, particularly regarding nocturnal wildlife, the entirety of onshore infrastructure, and tourism effects, have been overlooked. As a result, the Environmental Impact Assessment is incomplete, failing to provide a thorough understanding of the likely significant effects or residual impacts.

Furthermore, there are evident procedural deficiencies. The absence of a compliant Island Communities Impact Assessment contravenes the statutory duties outlined in the Islands (Scotland) Act 2018, while the omission of the full Social Impact Assessment represents a material oversight. These gaps 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 sufficiently demonstrate the protection of biodiversity, natural habitats, or cultural heritage. Additionally, it fails to illustrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. Moreover, the cumulative impacts of offshore and onshore elements have not been adequately assessed, clouding the understanding of effects on peatlands, carbon balance, habitats, and crofting land.

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

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

In summary, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, coupled with conflicts with policy and unresolved environmental risks, hinder the ability to make a lawful and evidence-based decision. It is imperative that the competent authority either refuse consent based on these grounds or invoke the necessary regulatory provisions to mandate the submission of the required information.

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

Additional Comments

This could be detrimental to our children's children and to the whole culture and ethos of the 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: F2B8A544