Member of the public 1190

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

Dear Sir/Madam

This representation constitutes a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The development is situated off the west side of the Isle of Lewis, an area renowned 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 the principles of sustainable development are fundamental, given the scale, proximity, and design of the project.

Critical environmental data is missing, and baseline information is limited and inconsistent, leading to significant deficiencies in the Environmental Impact Assessment Report and supporting documentation. The application fails to provide a robust evidential basis for a lawful determination, as key aspects of the proposal remain undefined. The flexible design framework employed prevents a clear understanding of likely significant effects, and reliance on unspecified mitigation measures makes it impossible to evaluate their effectiveness. Consequently, the documentation does not facilitate a full or informed understanding of environmental, cultural, or community impacts, undermining claims of negligible or non-significant effects.

There are clear and substantive policy conflicts, with the proposal appearing inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This is particularly evident in relation to biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate the capability to meet national requirements for protecting biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests required for consent and compromise the competent authority's ability to determine that the development is acceptable in policy terms.

The unprecedented scale of the proposal introduces significant concerns regarding landscape capacity, visual dominance, and environmental impact, as large turbines are positioned in close proximity to the shoreline. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicates that the application is incomplete and incapable of supporting a lawful determination. In light of these factors, the precautionary principle must apply.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and does not reliably account for the potential environmental effects of the proposal. A flexible

Project Design Envelope is employed without any commitment to specific turbine dimensions or layouts, creating significant uncertainty. This uncertainty hinders a proper application of a worst-case scenario analysis. As a result, the assessment's integrity is compromised, leading to impacts that may not accurately represent the development that will ultimately be constructed. This lack of clarity prevents both the public and the competent authority from grasping the true extent of environmental effects.

Moreover, the application depends on mitigation measures, monitoring strategies, and management plans that are not yet defined. Seeking consent on the basis that environmental harm will be addressed later undermines any meaningful evaluation of effectiveness and leaves residual impacts unassessed. Deferring essential information to post-consent stages is not acceptable and contradicts the purpose of the Environmental Impact Assessment regime, which requires that likely significant effects and mitigation be clearly established before a determination is made.

There are notable gaps in the evidence presented, including insufficient baseline data and methodological limitations. The application also relies on assumptions rather than site-specific evidence. This introduces uncertainty about the scale and significance of impacts, especially when negligible or non-significant effects are concluded without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, resulting in scientific uncertainty that does not align with statutory requirements.

Consequently, the application does not meet the evidential threshold mandated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly regarding protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, as it fails to show that impacts have been thoroughly assessed or that appropriate safeguards are established for biodiversity protection and environmental integrity.

Overall, the combination of an undefined design envelope, unspecified mitigation measures, and significant gaps in baseline data leads to an Environmental Impact Assessment Report that is unreliable and incomplete. These shortcomings hinder a lawful and rigorous assessment of environmental effects and leave the competent authority unable to make a determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives is inadequate and does not fulfil the requirements of the Environmental Impact Assessment regime. The application fails to provide a structured comparison of realistic alternatives based on their environmental effects. Instead, it offers a narrative of project evolution, which does not adequately demonstrate that less harmful options have been properly identified and selected over more damaging solutions.

There is a lack of transparent and evidence-based comparison regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not show that the developer has genuinely considered placing turbines further offshore, where the impacts on visual aesthetics, ecology, and the coast would likely be lessened. Given the sensitivity of the West Lewis coastline and the significance of proximity to shore in assessing impact, the omission of this analysis prevents any conclusion that the proposed siting is the least damaging option available.

These shortcomings also extend to the assessment of cable routing and landfall, with insufficient evidence that alternative routes have been adequately explored to avoid or minimise impacts on sensitive areas. This includes significant locations such as Barvas Cemetery, which holds cultural and spiritual importance. The absence of a clear strategy for avoidance and a lack of comparative analysis indicate that mitigation through design has not been implemented, resulting in an over-reliance on post-design mitigation measures.

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

From a policy standpoint, this deficiency compromises compliance with National Planning Framework 4, particularly concerning the protection of natural places, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a significant oversight, contributing 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 associated with the application is critically flawed and fails to deliver a comprehensive understanding of the ecological receptors in the West Lewis coastal environment. This area is a biologically active marine system, yet the baseline data presented is incomplete, and the methodologies employed do not sufficiently capture the presence, behaviour, and habitat use of the species within it. Consequently, the assessment lacks a solid evidential basis for impact evaluation.

A significant oversight is the inadequate recognition of otters, which are a European Protected Species, as the application does not properly evaluate their use of coastal areas for foraging and movement. The failure to assess their core foraging range and behavioural patterns means that the potential impacts of construction disturbance, noise, and increased activity remain unexamined. This oversight undermines any conclusions drawn regarding the absence of significant effects on this species.

Moreover, there are further shortcomings in the evaluation of basking sharks, where reliance on aerial surveys leads to considerable detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence, especially when compared to established land-based observations that indicate frequent utilisation of these waters. The omission of such relevant data contributes to an incomplete baseline, thereby undermining the reliability of the conclusions reached.

These methodological flaws mean that claims of negligible or non-significant effects are based on assumptions rather than sound evidence. The lack of sufficient baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty regarding the actual scale of risk to marine species and habitats necessitates immediate attention.

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 the identification and assessment of protected species are inadequate. The degree of uncertainty introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these circumstances, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, presenting significant gaps in evidence and internal inconsistencies that compromise its conclusions. The presence of internationally important seabird populations on the west coast of the Isle of Lewis, many of which are already experiencing decline, raises serious concerns. Despite this, the application does not adequately demonstrate that these species will not suffer adverse effects. Key foraging areas and migratory pathways are directly impacted by the development, yet the assessment fails to thoroughly evaluate the potential risks of displacement, collision, and habitat loss.

A notable contradiction arises within the application itself, as the developer asserts that there will be no significant adverse effects while also advancing a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This contradiction undermines the credibility of the assessment and suggests that the conclusions drawn are not substantiated by the evidence provided. Furthermore, the assessment does not convincingly show that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these vital feeding grounds is not adequately considered, and the reliance on modelling approaches introduces a degree of uncertainty, particularly concerning severely declining species like Kittiwakes and Fulmars. The methodologies employed are likely

to underestimate mortality rates, especially in instances where baseline data is lacking and the behavioural responses of the species are not fully understood.

Moreover, the placement of turbines within a designated migratory corridor significantly heightens the risk to avian populations, effectively creating a barrier along a primary flight path that species use while migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term repercussions of sustained mortality in this corridor, nor does it consider the implications for species with relatively small global populations.

From a regulatory standpoint, the application falls short of the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory findings, alongside data gaps and limitations in modelling, indicates that the standard of proof beyond reasonable scientific doubt has not been met. This invokes the precautionary principle, thereby hindering a lawful conclusion in favour of consent. Additionally, the identified deficiencies reflect a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally significant seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

In summary, the assessment lacks reliability due to its internal inconsistencies, methodological shortcomings, and inadequate evidence. These issues preclude a comprehensive evaluation of impacts and support the overall conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity is severely lacking, as it fails to acknowledge the West Lewis coastline as a vibrant cultural landscape where the environment, language, tradition, and community are interconnected. The application adopts a simplistic viewpoint, perceiving heritage merely as a collection of static, isolated assets without recognising their ongoing social, cultural, and spiritual relevance within the community.

Significant shortcomings are evident in how culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are treated. These sites serve as active burial places and centres of spiritual practice, yet they are erroneously classified as static features. This oversight neglects their current use, significance, and the potential impact of development on their surroundings. Such mischaracterisation leads to an incomplete assessment of cultural effects, disregarding their importance within community life.

Moreover, the assessment overlooks intangible cultural heritage, including the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These aspects are fundamental to the area's identity but are entirely omitted from the evaluation, leading to a substantial gap in understanding the

cultural ramifications of the development.

Concerns are further compounded by issues relating to community rights and participation. The Gaelic-speaking population embodies a distinct cultural identity with attributes recognised as characteristic of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the validity of the assessment and fails to adhere to established principles of participation in decisions that impact cultural and environmental interests.

Additionally, a crucial procedural error is the absence of a proper Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot meet its legal obligation to appraise the social, cultural, and economic impacts on the island community. This omission alone obstructs a lawful decision-making process.

From a policy standpoint, these shortcomings place the proposal in direct opposition to National Planning Framework 4, especially regarding the safeguarding of historic assets and locations. The neglect to consider both tangible and intangible heritage, alongside failing to recognise living cultural practices, constitutes a clear deviation from policy stipulations.

In summary, the inadequacies in assessing living heritage, intangible cultural significance, community rights, and statutory requirements culminate in a substantial evidential void. The cultural impacts of the development have not been adequately evaluated, and the application fails to offer a robust foundation for gauging the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

Residents have reported experiencing stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement with the community and are not speculative in nature. However, the non-disclosure of the full assessment limits proper scrutiny of these findings, affecting the ability to assess their significance in the decision-making process.

The proposal is viewed as a threat to community identity and cohesion, with “cultural loss” noted in the developer's findings. Yet, these impacts have not been adequately reflected in the main application or given the necessary consideration. The absence of the full Social Impact Assessment clouds the actual human and social costs associated with the development.

This lack of transparency compromises the Environmental Impact Assessment process. Understanding social, economic, and health impacts is crucial for developments of this magnitude, especially when community character may be at risk. The failure to provide the full dataset means the application does not offer a complete evidential basis for evaluating the balance between benefits and harms.

From a policy viewpoint, the application does not show compliance with National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and mitigate harm; however, the current evidence reveals existing negative effects that have not been fully disclosed. Without the complete assessment, it is impossible to demonstrate compliance with this policy.

The procedural consequences are serious. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the entire Social Impact Assessment. This represents a significant omission in the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment framework.

Overall, the failure to disclose the complete Social Impact Assessment, in conjunction with evidence of existing adverse impacts, results in an incomplete and unreliable assessment. This situation obstructs a lawful determination and underscores the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The current application presents significant shortcomings in its assessment of seascape, landscape, and visual impacts. It inadequately captures the scale of change and overlooks the sensitivity of the environment in question. The West Lewis coastline, characterised by its expansive Atlantic horizon and undeveloped landscape, possesses a profound sense of remoteness. Introducing large-scale turbines near the shore would result in a continuous industrial presence, fundamentally altering this cherished character and leading to a permanent transformation of the landscape.

The visual changes projected are not sufficiently articulated in the application. The sheer scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and compromising the intrinsic qualities of naturalness and remoteness. The assessment fails to communicate the extent of this impact and its significance within such a sensitive landscape context.

There are also notable methodological issues regarding the chosen visual viewpoints. Evidence indicates that these viewpoints may not adequately capture the perspectives of the most sensitive receptors or represent worst-case scenarios, particularly concerning culturally significant heritage sites and valuable landscapes. This raises concerns that the assessment may downplay the true magnitude of the visual impact, casting doubt on its reliability.

Moreover, the assessment neglects to explore the interconnectedness of landscape, seascape, and cultural heritage. Significant sites, such as the Calanais Standing Stones and other Scheduled Monuments, exist within a broader landscape context, linked to the Atlantic horizon through visual and spatial relationships. By treating these sites as isolated entities, the assessment misses the crucial interdependence that informs their cultural significance, leading to an incomplete evaluation of impacts on their settings.

The industrialisation of the seascape poses a threat to these relationships, fundamentally altering how heritage assets are perceived and disconnecting them from their natural horizon. This situation represents more than just a visual impact; it inflicts a cultural and spatial harm that has not been sufficiently assessed.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, particularly regarding the preservation of natural places and historic assets. The magnitude of the proposed change is at odds with the imperative 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 policy compliance.

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

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

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is deficient, lacking the necessary detail to evaluate potential environmental impacts adequately. The proposal entails significant seabed preparation and installation activities within the dynamic Atlantic environment, yet it does not present fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are to be formulated after consent, which hampers any meaningful assessment of their sufficiency or effectiveness.

This dependency on unspecified future measures raises particular alarm given the sensitivity of the surrounding environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are at risk from sediment disruption and contamination. Although the application recognises risks such as sediment mobilisation and the possibility of chemical or oil spills, it fails to detail how these incidents will be prevented, managed, or monitored.

There remains uncertainty regarding the scale and dynamics of sediment plumes that could result from seabed disruption and cable installation. In the absence of comprehensive modelling and clearly articulated management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also pertains to the potential effects on marine species and habitats that have already been identified as sensitive within the broader assessment.

Furthermore, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application obstructs the evaluation of whether adequate measures are established to respond to pollution incidents. This creates procedural risks and diminishes the ability of the competent authority to properly assess environmental protection measures at the determination stage.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements established by the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation measures be evaluated prior to consent, and the absence of such information renders a lawful determination impossible. The application also does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

Overall, the failure to provide defined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts lead to an assessment that is materially inadequate. These deficiencies inhibit a thorough evaluation of construction and pollution risks and further substantiate the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application provides an inadequate assessment of fisheries and marine life, lacking a thorough evaluation of both ecological and socio-economic impacts. Off the West Lewis coast, there exists a vibrant marine ecosystem and an active fishing industry. However, the proposal does not convincingly show that these habitats and uses can be safeguarded without significant disturbance.

A critical flaw is the assumption that fishing activities can be moved without any negative effects. The application fails to provide proof that alternative fishing grounds are not only available but also accessible and capable of handling the additional strain. This gap is crucial, as displacing fishing could lead to overfishing in other areas and might have broader economic repercussions for the local fleet. Without a solid, evidence-based assessment, the repercussions for fisheries and local livelihoods remain unclear.

Moreover, the proposed project poses significant risks to marine species, especially due to underwater noise produced during construction. Prolonged high-energy hammer piling is expected to disturb marine life over large distances, impacting species like dolphins. There are serious concerns regarding the projected disturbance to a notable

portion of the local bottlenose dolphin population. Yet, the application minimizes the importance of these impacts without adequate supporting evidence.

Furthermore, the application contains contradictions, as it acknowledges the necessity of licences to allow harm to European Protected Species while simultaneously claiming the impacts are negligible. This inconsistency questions the reliability of the assessment and raises issues of compliance with the Habitats Regulations, especially where anticipated harm requires legal authorisation.

The evaluation also neglects to account for cumulative impacts resulting from various pressures such as habitat disruption, noise, and the displacement of fishing activities. Without a thorough examination 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 adherence to the National Planning Framework 4 or the National Marine Plan. It fails to indicate that the development can coexist with current marine users or prevent unacceptable effects on marine biodiversity, thus hindering any conclusion that the proposal is sustainable.

In summary, the deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies compromise the assessment, rendering it incomplete and unreliable. These shortcomings obstruct a comprehensive evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The current application regarding the project presents a significantly incomplete assessment of the onshore infrastructure, failing to fully address the impacts associated with what should be considered as a single integrated project. The offshore turbines and the corresponding onshore works are inherently interconnected; however, their separate evaluations lead to a disjointed analysis that obscures the actual extent of environmental and socio-economic consequences.

Among the onshore components, the proposed installation of cabling through protected moorland, the construction of a substation in proximity to Stornoway, and the establishment of access routes through delicate landscapes are notable. These activities entail excavation in areas of deep peat, particularly within Barvas Moor, which is an ecologically sensitive habitat and a crucial carbon store. The application fails to deliver a thorough assessment of these impacts, hindering a complete understanding of the overall environmental footprint of the project.

Moreover, the omission or delay in assessing onshore impacts obstructs a comprehensive evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all aspects of a project must be examined collectively; yet, the delineation between offshore and onshore components results in an inadequate understanding of the combined effects on peatlands, habitats, and local communities.

There are considerable risks to sensitive habitats, such as machair systems and peatland environments, which have policy protection in place. The application does not provide sufficient evidence that these habitats' impacts have been thoroughly evaluated or that suitable avoidance strategies have been implemented, leading to an evident gap in biodiversity protection.

Furthermore, the routing of the proposed infrastructure through active croft land poses possible conflicts with existing land use and legal rights. The application does not demonstrate that the requisite consents or processes have been commenced, casting doubt on the project's feasibility and lawful execution.

From a policy standpoint, the disjunction in assessing the project holistically and demonstrating the safeguarding of peatlands, habitats, and land use interests stands in contradiction to both the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be effectively avoided or mitigated further weakens the application.

In conclusion, the separation of project components, the lack of a comprehensive assessment, and the absence of substantial evidence concerning environmental and land use impacts culminate in an incomplete and unreliable submission, thus obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

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

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

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

This shortfall is exacerbated by the reliance on daytime survey data within the

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

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

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

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

TOURISM

The application does not adequately assess the potential impacts on tourism, a vital sector for the Isle of Lewis economy. With tourism reliant on the area's stunning coastline, unspoiled landscapes, dark skies, and sense of remoteness, the omission of a thorough evaluation of how large-scale offshore infrastructure could affect visitor numbers, behaviours, and the overall economic contribution is concerning. Although it is acknowledged that 86% of visitors are attracted by the scenery, there is no quantified analysis provided.

Tourism on the Isle of Lewis has seen substantial growth, increasing from £65 million in 2017 to over £81.5 million, providing more than 1,000 jobs and constituting up to 16% of the island’s economy. Despite this impressive growth, the application does not explore how the industrialisation of the seascape and the degradation of environmental quality may impact the Tourism Gross Value Added or the resilience of the broader economy. Such an analysis is crucial to ascertain whether the proposed development would yield a net economic benefit or potentially jeopardise this established sector.

Furthermore, the application overlooks the critical role environmental quality plays in supporting tourism. The significance of unspoiled landscapes and dark skies to the visitor experience, as well as the emerging markets of nature-based tourism and astro-tourism, are inadequately addressed. The lack of a Dark Skies Assessment exacerbates this gap, failing to provide a comprehensive understanding of the implications for a recognised and growing segment of the local economy.

In an island community where economic diversification is limited, the failure to properly evaluate 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 considered, contravening the requirements set out under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, particularly concerning economic impacts and the necessity of showing a net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector, lacking the necessary evidence for the competent authority to thoroughly assess the economic repercussions of the proposal.

Overall, the failure to quantify tourism impacts, examine the environmental factors influencing visitor behaviour, and recognise the island's economic reliance culminates in a significant evidential gap. This hinders a robust evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. This application echoes the significant issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Currently, it is being submitted under a policy framework that emphasizes biodiversity, peatland conservation, landscape integrity, and community wellbeing more strongly.

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

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

Furthermore, the proposal contradicts the National Planning Framework 4, as it does not demonstrate adequate protection of biodiversity, natural environments, and cultural heritage. It fails to show that health and wellbeing impacts are acceptable, and

it cannot substantiate a net economic benefit due to the lack of tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been properly evaluated, clouding the assessment of impacts on peatlands, carbon balance, habitats, and crofting land.

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

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

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

Additional Comments

I STRONGLY object, and sent personal long objection letters.

Yours faithfully,

[Redacted]

Member of the public 1191

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

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The deficiencies within the Environmental Impact Assessment Report are substantial and render it fundamentally unreliable. The absence of specific turbine dimensions, layouts, or configurations due to the use of a flexible Project Design Envelope introduces a significant level of uncertainty. This lack of commitment prevents the application of a worst-case scenario consistently, which compromises the integrity of the assessment. Consequently, the impacts described may not accurately represent the final development, hindering both public comprehension and the ability of the competent authority to gauge the true environmental effects.

Moreover, the application hinges on mitigation measures, monitoring strategies, and management plans that have not yet been established. Seeking consent based on the promise of addressing environmental harm at a later date impedes any meaningful evaluation of the effectiveness of these measures or the assessment of residual impacts. This postponement of critical information to post-consent stages is procedurally unacceptable and contradicts the fundamental purpose of the Environmental Impact Assessment process, which mandates that significant effects and necessary mitigations be clearly identified before any determination is made.

Additionally, the report suffers from evidential shortcomings, which include gaps in baseline data and methodological limitations. The reliance on assumptions instead of site-specific evidence creates uncertainty surrounding the scale and significance of impacts. This is particularly concerning where conclusions of negligible or non-significant effects are drawn without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that cannot align with statutory requirements.

Due to these shortcomings, the application does not meet the evidential threshold established under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This raises concerns about the precautionary principle, especially regarding protected species and sensitive habitats. Furthermore, the proposal fails to comply with the requirements outlined in National Planning Framework 4, particularly those related to biodiversity protection and environmental integrity, as it cannot be demonstrated that impacts have been comprehensively assessed or that appropriate safeguards are in place.

In summary, the reliance on an undefined design envelope, the lack of specified mitigation measures, and the gaps in baseline data collectively undermine the reliability and completeness of the Environmental Impact Assessment Report. These critical deficiencies mean that a lawful and thorough assessment of environmental effects cannot be conducted, leaving the competent authority unable to make an informed decision 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 assessment of marine ecology and protected species is fundamentally inadequate, failing to offer a thorough and dependable understanding of the ecological receptors present in the West Lewis coastal environment. This region is a sensitive and biologically vibrant marine system, yet the methodologies used are insufficient to accurately capture species presence, behaviour, and habitat utilisation. Consequently, the assessment lacks a robust evidential basis for evaluating potential impacts.

A significant oversight pertains to otters, a European Protected Species, as the

application does not adequately recognise or evaluate their active use of coastal areas for foraging and movement. The omission of critical information regarding their core foraging range and behavioural patterns leads to an inadequate assessment of the potential effects of construction disturbance, noise, and increased activity. This gap undermines any conclusions drawn about the absence of significant effects on this species.

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

These methodological shortcomings lead to 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 engenders uncertainty regarding the actual scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been appropriately identified or assessed. The level of uncertainty introduced means that adverse effects cannot be excluded beyond reasonable scientific doubt, thereby 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 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 assessment conducted raises serious concerns regarding its reliability, primarily due to internal inconsistencies and methodological weaknesses. The development is situated within key foraging areas and migratory pathways on the west coast of the Isle of Lewis, which supports internationally important seabird populations that are already in decline. Despite this critical context, the application fails to meet the evidential threshold necessary to demonstrate that these species will not be adversely affected. It does not adequately evaluate the implications of displacement, collision risk, or habitat loss, leaving significant gaps in evidence.

A fundamental contradiction arises within the application itself, as the developer concludes that there are no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case. This case is only necessary when significant

harm is anticipated, thus casting doubt on the validity of the assessment and its conclusions. Moreover, there is insufficient evidence provided that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The critical importance of these feeding grounds is not fully considered, and reliance on modelling approaches contributes to uncertainty, particularly for species like Kittiwakes and Fulmars that are in severe decline. The methodologies employed are likely to underestimate mortality rates, particularly in light of incomplete baseline data and a lack of understanding of behavioural responses.

The positioning of turbines within a recognised migratory corridor presents a further significant risk, effectively creating a barrier along a primary flight path used by migratory species travelling between the United Kingdom and Iceland. The application does not sufficiently address 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 does not fulfil the evidential requirements needed to assert that there will be no adverse effect on the integrity of protected sites. The contradictory conclusions, data gaps, and limitations inherent in the modelling render the standard of beyond reasonable scientific doubt unachievable. This situation invokes the precautionary principle, thereby obstructing a lawful conclusion that would support consent.

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

In summary, the assessment is fundamentally flawed and cannot support the determination of the application due to its internal inconsistencies, methodological shortcomings, and lack of sufficient evidence.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

Particularly concerning is the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for burial and spiritual practices, yet they are categorised merely as static features in the assessment. This neglects their ongoing use and significance, as well as the potential impact of development on their surroundings. Such mischaracterisation leads to an incomplete evaluation of cultural effects and fails to acknowledge their vital role in community life.

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

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed introduction of large-scale turbines near the West Lewis coastline would fundamentally alter the landscape. This area is characterised by its open Atlantic horizon, undeveloped nature, and strong sense of remoteness. The assessment of the potential seascape, landscape, and visual impacts is deficient. It fails to represent the scale of change or the sensitivity of the environment adequately. The turbines would create a continuous industrial presence that would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and eroding the naturalness and remoteness of the region.

Methodological concerns exist regarding the selection and presentation of visual viewpoints. It appears that some viewpoints may not accurately reflect the most sensitive receptors or worst-case scenarios, particularly concerning key cultural

heritage sites and valuable landscapes. This may lead to an understatement of the visual impact, compromising the reliability of the assessment.

Moreover, the assessment overlooks the interconnected relationship between the landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments are linked visually and spatially to the Atlantic horizon. Treating these sites as isolated assets neglects their interdependence and leads to an incomplete evaluation of the impacts on their cultural significance and setting. The proposed industrialisation of the seascape would sever these connections, disrupting how heritage assets are experienced in relation to the natural horizon. This change represents a broader cultural and spatial harm that the application has not adequately addressed.

From a policy standpoint, the proposal conflicts with National Planning Framework 4 regarding the protection of natural areas and historic assets. The magnitude of change is incompatible with requirements to safeguard landscape character and visual amenity as well as the setting of culturally significant sites. The lack of a robust worst-case scenario assessment undermines any claim of compliance with policy.

Additionally, the identified impacts cannot be effectively mitigated. The height, scale, and proximity of the turbines would ensure that their presence is dominant and unavoidable. The resulting changes would be fundamental and permanent, rather than manageable to acceptable levels through mitigation efforts.

Overall, the assessment fails to accurately convey the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings prevent a reliable evaluation, reinforcing the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application does not provide sufficient detail to assess construction and pollution risks, which raises serious concerns. It involves significant seabed preparation and installation in a challenging Atlantic environment. However, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included. Instead, the application depends on mitigation and contingency measures to be created after consent is granted. This approach limits the ability to evaluate their effectiveness or adequacy.

The West Lewis coastline is particularly sensitive, supporting clean coastal waters and vital habitats that may be harmed by sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it lacks adequate detail on prevention, control, or monitoring strategies.

There is also uncertainty about the scale and behaviour of sediment plumes that may result from seabed disturbances and cable installation. Robust modelling and clearly

defined management strategies are necessary to understand the potential extent, duration, and ecological effects of these impacts. This uncertainty encompasses potential effects on marine species and habitats already recognised as sensitive in the broader assessment.

The lack of detailed emergency response procedures further heightens these issues. By postponing contingency planning until after consent, the application obstructs a proper evaluation of whether appropriate safeguards exist to deal with pollution incidents. This not only introduces procedural risk but also hinders the competent authority's ability to assess environmental protection measures before making a decision.

From a regulatory standpoint, deferring crucial environmental safeguards contradicts the Environmental Impact Assessment requirements. Significant effects and necessary mitigation must be evaluated before granting consent, and without this information, a lawful determination cannot occur. The application does not demonstrate compliance with policies related to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The application presents significant deficiencies in its assessment of marine life and fisheries, failing to provide a comprehensive evaluation of ecological or socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and a thriving fishing industry. However, the proposal does not demonstrate that these habitats and uses can be safeguarded from disruption.

One major issue is the assumption that fishing activities can be displaced without adverse effects. The application lacks evidence that alternative fishing grounds exist, are accessible, or can endure additional pressure. This absence of information is crucial, as such displacement could lead to overfishing in other areas and have broader economic implications for the local fishing fleet. Without a thorough and evidence-based assessment, the potential effects on fisheries and local livelihoods remain unclear.

The proposal also poses significant risks to marine species, particularly due to underwater noise from construction activities. Prolonged hammer piling may disturb marine life over large areas, with the local bottlenose dolphin population expected to be significantly affected. The application downplays the seriousness of these impacts without adequate evidence, raising concerns about its reliability.

Moreover, there is a noticeable inconsistency within the application regarding the need for licences to harm European Protected Species, while simultaneously classifying these impacts as negligible. This contradiction questions the credibility of the

assessment and highlights potential issues with compliance under the Habitats Regulations, particularly when harm is expected to a degree that necessitates legal authorisation.

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

From a policy viewpoint, the application fails to demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not show that the proposed development can coexist with current marine users or that it can avoid unacceptable impacts on marine biodiversity. Consequently, it cannot be concluded that the proposal constitutes sustainable development.

In summary, the combination of insufficient evidence regarding fishing displacement, underappreciation of acoustic impacts, and internal inconsistencies renders the assessment unreliable. These shortcomings obstruct a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal raises significant concerns regarding carbon balance, particularly due to the disturbance of peatland, which releases stored carbon and may create a carbon debt that undermines the goals of renewable energy development. The application does not sufficiently address this matter or prove that the overall carbon balance remains advantageous.

Infrastructure routing through active croft land introduces potential conflicts with established land use and legal rights. The application lacks evidence that necessary consents or processes have been initiated, which casts doubt on the feasibility and legality of implementation.

A comprehensive assessment of onshore infrastructure is lacking, leading to an incomplete understanding of the impacts stemming from what is essentially a singular integrated project. Onshore works, which encompass cabling across protected moorland, the construction of a substation near Stornoway, and the requisite access infrastructure througyh sensitive landscapes, are not considered alongside offshore turbines. This disjointed approach obscures the true extent of the environmental and socio-economic consequences.

By not adequately assessing onshore impacts, the application fails to evaluate cumulative effects properly. The Environmental Impact Assessment process mandates that all aspects of a project be considered holistically; however, the separation of offshore and onshore elements limits the understanding of combined impacts on peatlands, habitats, and local communities.

There are also considerable risks to sensitive habitats, such as machair systems and peatland environments, which enjoy policy protection. The application does not show that impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented. This leaves a significant evidential gap regarding biodiversity protection.

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

In summary, the fragmentation of project components, the absence of thorough assessment, and the lack of evidence concerning environmental and land use impacts render this part of the application incomplete and unreliable, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are a vital aspect of the area's environmental quality, cultural identity, and tourism appeal. However, the proposal introduces permanent red aviation lighting that would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment. This significant alteration is not addressed in the application, which fails to evaluate the impact of such lighting on visual amenity, landscape character, or the experiences of residents and visitors. Given the increasing importance of dark skies to the area's identity and to burgeoning sectors like astro-tourism, this omission creates a clear gap in the overall landscape and environmental assessment.

Moreover, there is no consideration of the effects on nocturnal wildlife, which is critical. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly sensitive to artificial lighting due to phototaxis, a phenomenon that can lead to disorientation and heightened collision risks. The absence of a lighting impact assessment or a phototaxis study means the application neglects to evaluate how aviation lighting may affect these species or contribute to their mortality rates. Additionally, the ornithological assessment relies solely on daytime survey data, overlooking nocturnal activity and associated dangers. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this danger has not been examined. The lack of site-specific night-time data results in a critical gap in understanding the ecological impacts of the proposal.

Without a thorough assessment of these nocturnal effects, it is impossible to ascertain whether protected species or designated sites could be adversely impacted. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and hindering a lawful determination. Furthermore, the failure to address these issues conflicts with National Planning Framework 4 regarding the protection of natural places and environmental

quality. It also undermines the overall evaluation of landscape and seascape impacts, as the character of night-time is an integral part of the environment.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm highlights significant shortcomings in sustainable development as required by statutory duties, national policy, and evidential standards. It echoes the fundamental concerns that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This new application, however, emerges under a strengthened policy framework that emphasises biodiversity, peatland protection, landscape integrity, and the wellbeing of the community.

There are critical gaps in the evidential basis provided for decision-making. The application is marred by an undefined design envelope, missing key mitigation measures, and omissions concerning the impacts on nocturnal wildlife, onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment remains incomplete, hindering a comprehensive understanding of significant effects and residual impacts.

Procedural missteps are also evident. The lack of a compliant Island Communities Impact Assessment constitutes a breach of obligations under the Islands (Scotland) Act 2018, while the failure to present the complete Social Impact Assessment represents a significant omission. These inadequacies impede the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unsuitable for determination.

This proposal is fundamentally at odds with the National Planning Framework 4. It fails to ensure the protection of biodiversity and cultural heritage, does not adequately assess health and wellbeing impacts, and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. Furthermore, there has been inadequate assessment of the cumulative impacts of both offshore and onshore elements, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

The environmental risks posed by the proposal are not only uncertain but potentially significant. The evaluations of marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The requisite evidential threshold to dismiss 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.

The proposal also threatens to cause considerable and irreversible alterations to a

highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, loss of dark skies, and disruption to cultural and visual relationships, alongside tourism impacts, will result in permanent effects that cannot be adequately mitigated.

In summary, the application is procedurally and substantively unfit for determination. The extent of information gaps, in conjunction with policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority should refuse consent on these grounds or exercise relevant regulatory provisions to mandate the submission of the outstanding information.

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

Additional Comments

This prò␣gram of construction reends to be reconsidered!!!
There has not been enough research into the long term impact this will have on our environment, both above and below our waters.
Local people's voices have never been taken into consideration. Why are the cables not put underground?
I ask you this.....If these pylons were to be placed in places of natural beauty, environmentally important areas in England-to supply power to Scotland, would they be approved???? I feel NOT.

Yours faithfully,

[Redacted]

Member of the public 1192

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 lacks completeness and does not offer a transparent or reliable account of the potential environmental effects of the proposal. The implementation of a flexible Project Design Envelope, which does not commit to

specific turbine dimensions, layouts, or configurations, creates significant uncertainty. This uncertainty hampers the ability to consistently apply a worst-case scenario, compromising the integrity of the assessment. As a result, the impacts described may not accurately represent the actual development, which hinders both public understanding and the competent authority's evaluation of the true environmental effects.

The application heavily depends on mitigation measures, monitoring strategies, and management plans that are not yet clearly defined. Seeking consent on the premise that environmental harm will be mitigated later prevents a thorough evaluation of effectiveness and residual impacts. Deferring essential information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which requires likely significant effects and mitigation to be established before determination.

There are also substantial evidential gaps, including missing baseline data, limitations in methodology, and reliance on assumptions rather than site-specific evidence. This leads to uncertainty about the scale and significance of impacts, especially where negligible or non-significant effects are asserted without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainties that cannot meet statutory requirements.

Consequently, the application does not satisfy the evidential standards set by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, which includes requirements for biodiversity protection and environmental integrity, as it fails to show that impacts have been fully assessed or that proper safeguards are established.

In summary, the combination of an undefined design envelope, unspecified mitigation measures, and gaps in baseline data results in an unreliable and incomplete Environmental Impact Assessment Report. These issues impede a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make a decision based on the provided information.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment regarding marine ecology and protected species is significantly lacking and fails to offer a complete and reliable understanding of the ecological receptors in the West Lewis coastal environment. This area is known for its biological activity and sensitivity, yet the baseline data provided is incomplete. The methodologies employed do not effectively capture the presence, behaviour, and habitat use of species within this marine system. Consequently, the assessment does not present a robust evidential basis for evaluating potential impacts.

A notable shortcoming involves otters, which are classified as a European Protected Species. The application does not adequately recognise or assess their active utilisation of coastal regions for foraging and movement. The oversight regarding 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 oversight undermines any conclusions made about the absence of significant effects on this species.

Further issues are evident in the evaluation of basking sharks. The reliance on aerial surveys creates significant detection bias, particularly in the Atlantic conditions, likely leading to an underestimation of their presence. This is particularly concerning when compared to established land-based observations that indicate regular use of these waters. The failure to integrate or adequately consider such data culminates in an incomplete baseline, which diminishes the reliability of the conclusions drawn.

These methodological shortcomings result in conclusions of negligible or non-significant effects that are based on assumptions rather than solid evidence. Additionally, the lack of adequate baseline data obstructs any meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation generates uncertainty regarding the actual level of risk 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 has not properly identified or assessed protected species. The degree of uncertainty introduced by these deficiencies precludes the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these circumstances, consent cannot be lawfully granted.

In conclusion, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions ultimately renders the assessment unreliable. These shortcomings inhibit a comprehensive evaluation of impacts on marine ecology and protected species, reinforcing the assertion that the application is lacking a sufficient evidential foundation.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The current assessment of cultural heritage and community identity is deeply flawed, neglecting the West Lewis coastline as a dynamic cultural landscape where the environment, language, tradition, and community are interlinked. Rather than recognising these elements as part of an ongoing cultural narrative, the application reduces heritage to isolated and static assets, overlooking their vital social, cultural, and spiritual roles within the community.

A significant shortcoming lies in the treatment of culturally important locations such as the cemeteries at Dalmore, Bragar, and Barvas. These sites remain active for burial and spiritual practice, yet the assessment inaccurately presents them as static features,

disregarding their current use, significance, and how the proposed development could affect their surroundings. This misinterpretation leads to an incomplete understanding of cultural implications, failing to acknowledge their integral role in community life.

The omission of intangible cultural heritage is another critical issue. Factors such as the Gaelic language, local traditions, and the longstanding bond between the community and the coastal environment are essential to the area's identity but are entirely overlooked in the assessment. The absence of these considerations obstructs a comprehensive understanding of the cultural impact of the proposed development.

Moreover, concerns about community rights and involvement are evident. The Gaelic-speaking population identifies as a distinct cultural group with characteristics of Indigenous Peoples, yet the process of Free, Prior and Informed Consent has not been followed. This lack of meaningful engagement calls into question the validity of the assessment and fails to adhere to established principles regarding participation in decisions that affect cultural and environmental interests.

There is a significant procedural oversight in the absence of a compliant Island Communities Impact Assessment, which is required under the Islands (Scotland) Act 2018. Without this assessment, the responsible authority cannot adequately evaluate the social, cultural, and economic consequences for the island community. This omission alone renders a lawful determination impossible.

From a policy standpoint, these issues place the proposal at odds with the National Planning Framework 4, especially regarding the safeguarding of historic assets and places. The failure to account for both tangible and intangible heritage, as well as the disregard for living cultural practices, constitutes a clear violation of policy requirements.

In summary, the neglect of living heritage, intangible cultural values, community rights, and legal obligations culminates in a substantial evidential void. The cultural impacts of the proposed development have not been adequately examined, and the application falls short in providing a thorough basis for assessing the true cultural costs of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The social impacts, health, and wellbeing assessment associated with the proposed development is significantly lacking in transparency and is inadequate for a lawful evaluation. While the developer commissioned a Social Impact Assessment that included focus groups with local residents, the complete report has not been published. This omission creates a substantial evidential gap that hinders both public understanding and the ability of the competent authority to grasp the full range of social risks uncovered by the developer’s own research.

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

impacts arise from direct engagement with the community and therefore are not mere speculation. However, the lack of disclosure regarding the full assessment limits proper scrutiny of the findings, ultimately restricting 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 references to “cultural loss” identified in the developer’s findings. Despite this recognition, these impacts have not been adequately integrated into the main application nor afforded the necessary consideration. The failure to release the complete Social Impact Assessment obscures the real human and social costs associated with the development.

This lack of transparency adversely affects the Environmental Impact Assessment process. Understanding the social, economic, and health implications is crucial for developments of this magnitude, particularly when they may disrupt community character and functioning. The application, in withholding the full dataset, fails to provide a comprehensive evidential foundation for balancing the proposed benefits against potential harm.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 regarding health and wellbeing. Developments should contribute to positive health outcomes and mitigate harm; however, the evidence available points to existing adverse effects that remain inadequately disclosed. Without access to the full assessment, compliance with this policy cannot be substantiated.

The procedural ramifications of this situation are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment, representing a material omission within the application that fails to meet the evidential standards required by the Environmental Impact Assessment regime.

Overall, the decision to withhold the full Social Impact Assessment, coupled with evidence of current negative impacts, results in an incomplete and unreliable evaluation. This lack of information precludes a lawful determination and underscores the conclusion that the application is not backed by sufficient data.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal involves the development of onshore infrastructure linked to offshore turbines. However, the assessment of the onshore components is incomplete and does not reflect the full range of impacts from this integrated project. The offshore and onshore elements are considered separately, leading to a fragmented view that obscures the overall environmental and socio-economic consequences.

Key onshore components include cabling across protected moorland and the construction of a substation near Stornoway, along with access infrastructure across sensitive landscapes. These activities involve excavation in areas of deep peat, notably

within Barvas Moor, which serves as a crucial carbon store and ecologically delicate habitat. The application lacks a thorough assessment of these impacts, hindering a complete understanding of the project's environmental footprint.

The separation of offshore and onshore assessments prevents an accurate evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be reviewed together. However, due to the current approach, the cumulative impacts on peatlands, habitats, and local communities remain unclear.

Additionally, there are considerable risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application does not provide sufficient evidence that the effects on these habitats have been thoroughly evaluated or that appropriate avoidance measures have been put in place, indicating a significant gap in terms of biodiversity protection.

Concerns are also raised about carbon balance. The disturbance of peatland can release stored carbon, potentially resulting in a carbon debt that contradicts renewable energy goals. The application does not sufficiently address this concern or prove that the overall carbon balance is advantageous.

Moreover, routing infrastructure through active croft land may create conflicts with existing land use and legal rights. The application fails to show that the necessary consents or processes have been initiated, casting doubt on the project's deliverability and legal compliance.

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

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

SUMMARY

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

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

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

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

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

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The evidential threshold necessary to demonstrate that adverse effects can be excluded beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and impeding a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The breadth of information deficiencies, coupled with policy conflicts and unresolved environmental risks, prohibits a lawful and evidence-based decision. The competent authority must refuse consent based on these grounds or invoke the relevant regulatory provisions to require the submission of the missing information. Therefore, a formal request is made for the application for the Spiorad na Mara Offshore Wind Farm to be refused in its entirety.

Yours faithfully,

[Redacted]

all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 71E355C2

Member of the public 1193

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. A thorough examination of the Environmental Impact Assessment Report and its accompanying documentation reveals significant deficiencies in planning, environmental considerations, cultural factors, and procedural aspects. The proposed development is situated off the west coast of the Isle of Lewis, an area notable for its Atlantic-facing coastline, near-pristine environment, and strong cultural heritage. Concerns arise regarding the scale, proximity, and design of the project, questioning its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential foundation for lawful determination. Essential environmental data is absent, baseline information is inconsistent and limited, and critical elements of the proposal remain unspecified. The flexible design framework used prevents a comprehensive understanding of potential significant effects, and the reliance on yet-to-be-defined mitigation measures raises doubts about their effectiveness. Consequently, the documentation fails to provide a complete or informed perspective on environmental, cultural, or community impacts, undermining claims of negligible or non-significant effects which are not backed by robust evidence.

There are evident and substantive conflicts with policy. The proposal does not appear to align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These inconsistencies directly relate to the statutory tests necessary for consent and compromise the capacity of the competent authority to affirm the proposal's acceptability in policy terms.

The unprecedented scale of the proposal introduces substantial concerns, especially with large turbines positioned near the shoreline, impacting landscape capacity, visual dominance, and overall environmental consequences. Collectively, the lack of adequate information, dependence on undefined mitigation measures, evidential shortcomings, and clear conflicts with policy indicate that the application is incomplete and cannot support a lawful determination. In light of these issues, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate, failing to deliver a complete, transparent, or trustworthy overview of the likely environmental repercussions of the proposal. The flexible Project Design Envelope, which lacks specific turbine dimensions, layouts, or configurations, creates substantial uncertainty and hinders the application of a worst-case scenario. This compromises the assessment's integrity, meaning the impacts outlined may not accurately represent the development that is ultimately built. Consequently, both the public and the competent authority are deprived of a true understanding of the extent 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 on the premise that environmental harm will be mitigated later obstructs a meaningful evaluation of effectiveness or assessment of residual impacts. Such deferral of critical information to post-consent stages is procedurally unacceptable and contradicts the Environmental Impact Assessment regime's purpose, which necessitates that likely significant effects and mitigation measures be established before determination.

There are substantial evidential deficiencies present, including insufficient baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. This leads to uncertainty regarding the magnitude and significance of impacts, particularly where conclusions of negligible or non-significant effects are reached without strong supporting data. The lack of adequate information inhibits 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 mandated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. The proposal additionally falls short of demonstrating compliance with National Planning Framework 4, including its stipulations regarding biodiversity protection and environmental integrity, as it cannot be verified that impacts have been comprehensively assessed or that suitable safeguards are in place.

In summary, the combination of an undefined design envelope, absence of specified mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings prevent a lawful and thorough assessment of environmental effects and indicate that the competent authority cannot properly determine the application based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application presents significant inadequacies in its assessment of alternatives, failing to meet the statutory requirements outlined in the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives based on environmental effects, it provides a narrative account of the project's evolution. This approach does not adequately demonstrate that less

harmful options have been identified, assessed, and selected over more damaging ones.

There is a lack of transparent, evidence-based comparisons of alternative offshore locations, development scales, and design configurations. Notably, the developer has not shown that serious consideration has been given to positioning turbines further offshore, where visual, ecological, and coastal impacts could potentially be reduced. Given the sensitive nature of the West Lewis coastline and the critical importance of proximity to the shore in evaluating impact, the absence of such analysis means that it cannot be concluded that the proposed siting is the least damaging option.

These deficiencies extend to the assessment of cable routing and landfall, where there is insufficient evidence to suggest that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors. This includes areas of cultural and spiritual significance, such as Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis indicate that mitigation by design has not been employed, relying instead on post-design mitigation measures.

As a consequence, the application fails to demonstrate that environmental harm has been minimised through considerations of site selection, layout, and infrastructure routing. This represents a failure to adhere to the established mitigation hierarchy and hampers the competent authority's ability to ascertain whether less harmful and more appropriate alternatives are available. Without a comprehensive assessment of alternatives, it cannot be concluded that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this inadequacy undermines compliance with National Planning Framework 4, particularly concerning the protection of natural environments, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment constitutes a material omission that contributes to the overarching conclusion that the application has not been sufficiently evaluated and cannot support a lawful 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 absence of the full Social Impact Assessment is a serious issue. This omission means that the public and the competent authority cannot fully understand the social risks highlighted by the developer’s research. Summaries suggest that local residents are experiencing real stress, anxiety, and concern due to the scale and proximity of the proposal. These effects are based on direct feedback from the community and are not merely assumptions. However, without access to the complete assessment, the implications of these findings cannot be properly scrutinised, which limits the ability to gauge their importance in the decision-making process.

Moreover, the proposal is seen as a threat to community identity and cohesion, with "cultural loss" flagged in the developer’s findings. Unfortunately, these impacts have

not been adequately included in the application or given the necessary attention. The withholding of the full assessment obscures the true social and human costs of the proposed development.

This lack of transparency also weakens the Environmental Impact Assessment process. It is crucial to fully understand the social, economic, and health impacts of developments of this nature, especially where they may disrupt community character and functioning. The incomplete dataset means the application does not provide a solid basis for weighing benefits against potential harm.

From a policy standpoint, the application does not show adherence to National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and mitigate harm, yet the available information highlights existing negative effects that remain undisclosed. Without the complete assessment, it is impossible to prove compliance with this policy.

The procedural consequences of these shortcomings are significant. The competent authority is unable to perform a thorough socio-economic and health evaluation without the full Social Impact Assessment. This represents a critical gap in the application and a failure to meet the evidential standards required by the Environmental Impact Assessment framework.

In summary, the failure to disclose the complete Social Impact Assessment, alongside evidence of current adverse effects, leads to an incomplete and unreliable evaluation. This undermines the possibility of a lawful decision and confirms that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of the visual, seascape, and landscape impacts is significantly lacking and does not sufficiently capture the extent of change or the vulnerability of the surrounding environment. The coastline of West Lewis is characterised by an unobstructed Atlantic horizon, an undeveloped landscape, and a profound sense of isolation. The proposed large-scale turbines placed near the shore would impose a relentless and dominant industrial feature, which would fundamentally alter this unique character, leading to a permanent and irreversible change in the landscape.

Furthermore, the application fails to accurately depict the extent of this visual alteration. Given their size and location, the turbines would overshadow views from residential areas, historic sites, and frequently visited coastal spots. This would adversely affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not effectively communicate the significance of this impact within the context of such a delicate landscape.

Methodological issues also arise concerning the selection and portrayal of visual viewpoints. Evidence indicates that the viewpoints chosen might not adequately reflect the most sensitive receptors or the most severe scenarios, especially regarding crucial

cultural heritage locations and high-value landscapes. This raises concerns that the visual impact may be underrepresented, which compromises the credibility of the assessment.

Moreover, there is a notable deficiency in evaluating the interconnectedness between landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape context interconnected through visual and spatial relationships with the Atlantic horizon. The assessment treats these heritage assets as separate entities rather than acknowledging their interdependence, leading to a partial understanding of the effects on their surroundings and cultural importance.

The proposed industrialisation of the seascape would disrupt these relationships, modifying the context in which cultural heritage sites are perceived and severing their ties to the natural horizon. This signifies not only a visual impact but also a wider cultural and spatial detriment that has not been thoroughly assessed in the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4 concerning the safeguarding of natural environments and historical assets. The magnitude of change is inconsistent with the obligation to preserve landscape character, visual amenity, and the context of culturally important sites. The lack of a comprehensive worst-case analysis further calls into question any assertions of policy adherence.

Moreover, it is evident that the impacts recognised cannot be adequately mitigated. The scale, height, and proximity of the turbines would ensure their presence is dominant and unavoidable. Consequently, the resulting transformation is fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation efforts.

Overall, the assessment fails to provide an accurate representation of the impact's scale, the environment's sensitivity, and the intertwined nature of the landscape and cultural heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is not compatible with the protection of this landscape.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application fails to provide a comprehensive assessment of the onshore infrastructure, which is materially incomplete. It neglects to consider the full scope of impacts resulting from what constitutes a single integrated project. The offshore turbines and onshore works are intrinsically connected; however, their separate assessments lead to a fragmented understanding that obscures the true scale of environmental and socio-economic effects.

Among the onshore components are cabling traversing protected moorland, the construction of a substation in proximity to Stornoway, and associated access infrastructure that traverses sensitive landscapes. These activities entail excavation in

areas of deep peat, particularly within Barvas Moor, an area recognised for its ecological sensitivity and as a significant carbon store. The absence of a thorough evaluation of these impacts inhibits a complete understanding of the overall environmental footprint of the project.

By omitting or delaying the assessment of onshore impacts, the application hinders an appropriate evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all components of a project are considered in conjunction. However, the distinct treatment of offshore and onshore elements results in an insufficient understanding of the combined impacts on peatlands, habitats, and local communities.

The proposal also raises significant concerns regarding sensitive habitats, including machair systems and peatland environments, which are afforded policy protection. The application does not convincingly demonstrate that the impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, thus highlighting a substantial evidential gap in relation to biodiversity protection.

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment concerning dark skies and nocturnal wildlife represents a significant oversight in the Environmental Impact Assessment. The West Lewis coastline is distinguished by its exceptionally dark skies, which are crucial to the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting, which would be visible over considerable distances, threatens to create an intrusive and continuous "wall of light" across the western horizon, fundamentally changing the night-time environment.

Moreover, the proposal fails to evaluate the implications of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. Given the critical role dark skies play in the identity of the region and the growing sector of

astro-tourism, this lack of analysis is particularly concerning. The neglect to consider these impacts results in a distinct gap in the overall landscape and environmental assessment.

Equally alarming is the lack of any assessment regarding the impact on nocturnal wildlife. Certain species, including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, are notably sensitive to artificial lighting due to their phototaxis behaviour, which can cause disorientation and increase the risk of collisions. The application does not incorporate any lighting impact assessment or phototaxis study, thus neglecting to examine how the proposed aviation lighting could influence these species or contribute to increased mortality rates.

This gap is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which overlooks nocturnal activity and the associated risks. Species such as Kittiwakes, which may forage or migrate during the night, also face disorientation from artificial lighting. The lack of site-specific night-time data hinders a comprehensive understanding of the ecological impacts involved.

Without a proper evaluation of nocturnal impacts, it remains impossible to ascertain whether protected species or designated sites may experience adverse effects. The required evidential standard necessary to exclude potential adverse impacts beyond reasonable scientific doubt is not met, thereby invoking the precautionary principle and obstructing a lawful determination.

From a policy standpoint, this omission contradicts the National Planning Framework 4 in its commitment to safeguarding natural spaces and maintaining environmental quality. Furthermore, it diminishes the broader evaluation of landscape and seascape effects, given that night-time character is an essential aspect of the environment.

In summary, the failure to assess dark skies and nocturnal wildlife results in a major evidential deficiency. The absence of baseline data, impact modelling, and species-specific analysis renders the application incomplete and unable to facilitate a lawful determination.

SUMMARY

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

There are major deficiencies in the evidential basis necessary for determination. Critical gaps in baseline data exist, alongside the continued use of an undefined design envelope, and reliance on unspecified mitigation measures. Additionally, key impact

pathways, such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism, are omitted. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of potential significant effects or residual impacts.

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

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

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments regarding marine ecology, seabirds, protected species, and marine mammals are not only incomplete but, in some areas, inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and rendering a lawful conclusion regarding the acceptability of impacts impossible.

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

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

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

Yours faithfully,

[Redacted]

all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 4C851D67

Member of the public 1194

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

Dear Sir/Madam

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

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

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

The unprecedented scale of this proposal in the given location, featuring large turbines in close proximity to the shoreline, raises substantial concerns regarding landscape capacity, visual impact, and overall environmental consequences. In summary, the combination of insufficient information, reliance on undefined mitigation measures, evidential shortcomings, and clear non-compliance with policy underscores that the application is incomplete and unable to substantiate a lawful determination. In light of these factors, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

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

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

In conclusion, the reliance on an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings obstruct a lawful and thorough assessment of environmental effects and mean that the competent authority lacks the necessary information to make a determination regarding the application.

ASSESSMENT OF ALTERNATIVES

The application proposes a development that does not adhere to the necessary statutory requirements of the Environmental Impact Assessment regime. Instead of offering a coherent and evidence-based comparison of realistic alternatives concerning environmental effects, it provides a narrative of how the project has evolved. This narrative does not adequately demonstrate that less harmful options have been thoroughly identified, assessed, and chosen over more damaging solutions.

There is a lack of transparency and an absence of evidence in the comparison of alternative offshore locations, development scales, or design configurations. Notably, the application fails to show that the developer has genuinely considered placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts could be diminished. Given the sensitivity of the West Lewis coastline and the critical significance of proximity to shore in assessing impact, the lack of such analysis means it cannot be concluded that the proposed siting is the least damaging option.

The shortcomings also extend to the evaluation of cable routing and landfall assessment. There is insufficient evidence that alternative routes have been adequately explored to avoid or reduce impacts on sensitive receptors, including areas of cultural and spiritual significance such as Barvas Cemetery. The absence of a clear strategy to avoid impacts, along with a lack of comparative analysis, suggests that mitigation by design has not been appropriately applied, leading instead to reliance on post-design mitigation measures.

Consequently, the application does not illustrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This signifies a departure from the established mitigation hierarchy and leaves the competent authority unable to ascertain whether more suitable and less harmful alternatives are available. Without a comprehensive assessment of alternatives, it cannot be established that the proposal is sustainable or compliant with policy requirements.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The application lacks a thorough assessment of marine ecology and protected species, which is crucial for understanding the ecological receptors in the West Lewis coastal area. This region is known for its sensitivity and biological activity, yet the baseline data remains incomplete. The methods used have not effectively captured important details about species presence, behaviour, and habitat usage. Consequently, the assessment fails to provide a solid evidential basis to evaluate the potential impacts.

One significant oversight is the failure to appropriately acknowledge the presence of otters, which are protected under European law. The application does not adequately assess their use of coastal areas for foraging and movement. There is insufficient consideration of their core foraging range and behavioural patterns, leading to an inadequate assessment of potential impacts from construction disturbance, noise, and increased activity. This lack of information undermines any claims of no significant effects on otters.

Additionally, the assessment of basking sharks shows shortcomings, as the reliance on aerial surveys creates a significant detection bias, particularly under Atlantic weather conditions. This method is likely to underestimate their presence, especially when compared to established land-based observations that indicate frequent use of these waters. Ignoring or inadequately considering this data contributes to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings mean that claims of negligible or non-significant effects stem from assumptions rather than strong evidence. Without sufficient baseline data, it becomes impossible to assess cumulative and indirect impacts meaningfully, including seasonal variations and broader ecosystem interactions. This situation leads to uncertainty regarding the actual risk faced by marine species and habitats.

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

Overall, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These issues hinder a thorough evaluation of impacts on marine ecology and protected species and contribute to the conclusion that the application lacks a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the ornithological impacts related to the proposed development is fundamentally flawed, characterised by significant gaps in evidence and internal inconsistencies that undermine its conclusions. It is crucial to note that 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 fails to provide adequate evidence to demonstrate that these species will not be adversely affected. Additionally, the development is situated within key foraging areas and migratory pathways, yet there is a lack of robust evaluation regarding the implications of displacement, collision risk, or habitat loss.

Within the application lies a fundamental contradiction. The developer asserts that there will be no significant adverse effects while concurrently advancing a Habitats

Regulations derogation case, which is necessitated only when significant harm is anticipated. This inconsistency raises serious concerns about the reliability of the assessment and suggests that the conclusions presented lack support from the underlying evidence. The assessment does not sufficiently address whether seabirds associated with protected sites such as the Lewis Peatlands and St Kilda will be unaffected. The significance of these vital feeding grounds is not fully considered, and reliance on modelling methods introduces uncertainty, particularly for species experiencing severe decline, such as Kittiwakes and Fulmars. Methodologies employed are likely to underestimate mortality rates, especially when baseline data is incomplete and behavioural responses remain inadequately understood.

Moreover, the placement of turbines within a recognised migratory corridor introduces a substantial risk, effectively creating a barrier along a primary flight path utilised by species migrating between the United Kingdom and Iceland. There is an inadequate assessment of the long-term implications of continued mortality within this corridor, as well as the potential effects 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, coupled with data deficiencies and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This invokes the precautionary principle and precludes a lawful conclusion that would support consent.

Overall, the deficiencies identified illustrate a failure to comply with National Planning Framework 4 in terms of biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally significant seabird populations will not be adversely affected places the proposal in direct conflict with national policy. Collectively, these factors render the assessment unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. These shortcomings hinder a thorough evaluation of potential impacts and lead to the conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development fails to adequately assess cultural heritage and community identity, treating the West Lewis coastline merely as a collection of isolated, static assets rather than recognising it as a vibrant cultural landscape where environment, language, tradition, and community intertwine. This reductive approach overlooks the ongoing social, cultural, and spiritual roles that these heritage elements play within the community.

Particularly concerning is the inadequate treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are active burial sites and places of spiritual significance, yet the assessment characterises them as static features, ignoring their continued use and the implications of development on their context. This mischaracterisation leads to an incomplete understanding of the

cultural effects and dismisses their importance in community life.

Moreover, the assessment neglects intangible cultural heritage, including the Gaelic language, traditions, and the community's deep-rooted relationship with the coastal environment. These aspects are essential to the area's identity, yet they are entirely omitted from the evaluation, representing a significant gap. Without recognising these factors, the true cultural impact of the development remains unclear.

There are additional concerns regarding community rights and the lack of engagement. The Gaelic-speaking population, recognised as possessing a distinct cultural identity akin to that of an Indigenous People, has not been involved in a process of Free, Prior and Informed Consent. This absence of genuine participation undermines the legitimacy of the assessment and fails to uphold established principles of inclusion in decisions affecting cultural and environmental matters.

A significant procedural oversight is the failure to conduct a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The lack of this assessment means that the competent authority is unable to meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community, rendering any determination legally deficient.

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

Overall, the combined failure to evaluate living heritage, intangible cultural value, community rights, and statutory requirements creates a significant evidential gap. The cultural impacts of the development have not been appropriately assessed, and the application fails to establish a solid foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the Social Impact Assessment is a critical concern, as it hampers a lawful evaluation of the project's social, economic, and health implications. Although the developer engaged local residents through focus groups, the failure to publish the complete report results in a significant evidential gap. This omission obstructs the public and the competent authority from fully understanding the social risks highlighted by the developer's research.

Residents have reported experiencing measurable stress, anxiety, and concern linked to the scale and proximity of the proposed development. These impacts are based on direct feedback and are not mere speculation. However, without access to the complete assessment, it becomes challenging to scrutinise the findings effectively and assess their relevance in the decision-making process.

Moreover, the proposal is viewed as a threat to community identity and cohesion, with evidence of "cultural loss" arising from the developer's findings. Yet, these adverse impacts have not been adequately considered within the main application, which further complicates the understanding of the potential social costs associated with the development.

This deficiency in transparency also undermines the Environmental Impact Assessment process. A thorough comprehension of the social, economic, and health impacts is vital for projects of this magnitude, particularly when they may disrupt community character and functioning. By withholding the full dataset, the application does not provide 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 should promote positive health outcomes and mitigate harm, yet the evidence available suggests that adverse effects exist and have not been fully revealed. Therefore, it is impossible to establish compliance with this policy without the complete assessment.

The procedural ramifications of this situation are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation due to the absence of the full Social Impact Assessment. This represents a significant omission within the application and falls short of the evidential standards required by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, coupled with evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This situation hinders a lawful determination and supports the assertion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

these impacts or their importance within the context of this sensitive landscape.

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

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

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

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, particularly regarding the safeguarding of natural places and historic assets. The extent of the proposed change is incompatible with the obligation to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertion of compliance with policy.

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks a thorough assessment of construction and pollution risks, which is necessary to evaluate environmental effects. Significant works on the seabed will take place in a high-energy Atlantic environment, yet there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included. The application depends on mitigation and contingency measures that are to be developed after consent is granted, hindering any effective evaluation of their adequacy

or effectiveness.

This approach raises serious concerns, particularly due to the sensitivity of the environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are at risk of damage from sediment disturbance and contamination. While the application acknowledges risks like sediment mobilisation and accidental spills of chemicals or oil, it does not provide enough detail on how these incidents will be prevented, managed, or monitored.

There is also ambiguity regarding the scale and behaviour of sediment plumes caused by seabed disturbance and cable installation. Without thorough modelling and well-defined management strategies, it is impossible to assess the extent, duration, or ecological impacts of these effects. This uncertainty also relates to potential impacts on marine species and habitats identified as sensitive in the broader assessment.

The lack of detailed emergency response procedures amplifies these issues. By postponing contingency planning to a time after consent, the application makes it difficult to evaluate whether adequate safeguards are in place for responding to pollution incidents. This creates procedural risks and undermines the competent authority's ability to assess environmental protection measures effectively.

From a regulatory standpoint, this postponement of essential environmental safeguards contradicts the requirements set by the Environmental Impact Assessment regime. Significant effects and mitigation must be evaluated before consent is granted, and without this information, a lawful decision cannot be made. The application also falls short of demonstrating adherence to policy requirements concerning environmental protection and water quality.

Overall, the lack of clearly defined mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts render the assessment seriously deficient. These issues prevent a robust evaluation of construction and pollution risks, supporting the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal lacks a thorough assessment of fisheries and marine life, failing to provide a comprehensive evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and a vibrant fishing industry. However, the application does not convincingly demonstrate that these vital uses and habitats can be safeguarded or preserved without significant disruption.

A crucial concern lies in the erroneous assumption that fishing activities can be displaced without repercussions. The application lacks evidence to support the availability, accessibility, or capacity of alternative fishing grounds to sustain additional pressure. This notable absence poses a considerable risk of overfishing in different

areas, which may have broader economic ramifications for the local fleet. The absence of a clear and evidence-based assessment renders the impacts on fisheries and local livelihoods difficult to understand.

Moreover, the proposal introduces considerable risks to marine species, particularly due to the underwater noise produced during construction. The extended high-energy hammer piling is expected to create disturbances over extensive distances, affecting various species including dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises substantial concerns; however, the application minimises the importance of these effects, lacking adequate supporting evidence.

The application presents a contradiction by acknowledging the necessity for licences to permit harm to European Protected Species while simultaneously claiming that the impacts are negligible. This inconsistency undermines the credibility of the assessment and raises issues regarding adherence to the Habitats Regulations, especially where harm is expected to a degree that necessitates legal authorisation.

Furthermore, the assessment does not adequately address cumulative impacts that arise from multiple pressures, such as habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, it remains impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

In summary, the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and internal inconsistencies collectively render the assessment incomplete and unreliable. These shortcomings hinder a robust evaluation of 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 omission of an assessment regarding dark skies and nocturnal wildlife is a significant gap in the Environmental Impact Assessment, which has serious implications for the proposal. The West Lewis coastline is known for its exceptionally dark skies, which are integral to the area's environmental quality, cultural identity, and tourism appeal. The introduction of permanent red aviation lighting, which would be visible over long distances, would create a continuous and intrusive "wall of light" across the western horizon, fundamentally altering the night-time environment.

Moreover, the application fails to evaluate the impact of this lighting on visual amenity,

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

More critically, there has been no evaluation of the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to phototaxis, which can result in disorientation and an increased risk of collision. The absence of a lighting impact assessment or a phototaxis study means that there has been no evaluation of how aviation lighting may affect these species or contribute to their mortality.

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

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

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

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

TOURISM

The shortcomings in the assessment of tourism impacts represent a critical oversight, particularly given the importance of this sector to the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and overall sense of remoteness. While the application recognises that a significant 86% of visitors are attracted by scenery, it lacks a detailed evaluation of how large-scale offshore infrastructure could influence visitor numbers, their behaviour, or the overall economic contributions they make.

The economic significance of tourism has grown notably, rising from £65 million in 2017

to more than £81.5 million, which supports over 1,000 jobs and accounts for nearly 16% of the island's economy. Nevertheless, the application fails to explore how the industrialisation of the seascape and the consequent decline in environmental quality would impact Tourism Gross Value Added or the broader economic resilience of the area. Without such an analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or jeopardise this vital and expanding sector.

Moreover, the assessment neglects to address the essential role that environmental quality plays in supporting tourism, particularly the value of unspoiled landscapes and dark skies to the visitor experience. This gap is further exacerbated by the absence of a Dark Skies Assessment, which is crucial for understanding the implications for an emerging market that includes nature-based tourism and astro-tourism.

In an island community characterised by limited economic diversification, the disregard for tourism impacts has far-reaching consequences for employment, local businesses, and community sustainability. The lack of a proper Island Communities Impact Assessment means that these economic vulnerabilities have not been duly evaluated, as is required under the Islands (Scotland) Act 2018.

From a policy perspective, the application does not demonstrate compliance with National Planning Framework 4, especially regarding the need to evaluate economic impacts and show net benefit. It also runs counter to strategic objectives that highlight tourism as a priority growth sector, lacking sufficient evidence for the competent authority to assess the economic ramifications of the proposal.

Collectively, the failure to quantify tourism impacts, evaluate the environmental factors that drive visitor behaviour, and consider the island’s economic dependency creates a significant evidential gap. This hinders a thorough assessment of the economic effects and underscores the incomplete nature of the application.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a serious failure to meet the principles of sustainable development as required by statutory duties and national policy. This application revisits the fundamental issues that resulted in the 2008 refusal of the Lewis Wind Power proposal, which was rejected due to its unacceptable scale of industrialisation. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it remains inadequate.

Significant gaps exist in the evidential foundation necessary for proper determination. The use of an undefined design envelope is problematic, and there is a reliance on unspecified mitigation measures. Notably, the application overlooks critical impact pathways, including those affecting nocturnal wildlife, the complete scope of onshore infrastructure, and potential tourism effects. Consequently, the Environmental Impact Assessment falls short, hindering a comprehensive understanding of likely significant

effects and residual impacts.

Moreover, procedural failures are evident. The lack of a compliant Island Communities Impact Assessment contravenes the Islands (Scotland) Act 2018, and the absence of a full Social Impact Assessment is a material omission. These shortcomings inhibit the competent authority from fully evaluating the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application inappropriate for determination.

The proposal also directly contradicts National Planning Framework 4, failing to demonstrate adequate protection for biodiversity, natural environments, and cultural heritage. It does not provide evidence that health and wellbeing impacts are acceptable nor does it establish a net economic benefit, as it lacks tourism impact modelling. Additionally, the cumulative effects of both offshore and onshore components have not been adequately assessed, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal are uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also inconsistent in parts. The necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful determination regarding acceptable impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The combination of significant information deficiencies, conflicts with policy, and unresolved environmental risks obstructs a lawful and evidence-based decision. Therefore, it is requested that consent for the Spiorad na Mara Offshore Wind Farm proposal be entirely refused.

Additional Comments

Having visited Lewis and the west coast of the Outer Hebrides on several occasions, I consider the landscape to be among the most extraordinary and unspoilt environments remaining in the United Kingdom.

What makes the area so unique is not simply its beauty, but its sense of openness, remoteness and environmental integrity. The relationship between the Atlantic coastline, dark skies, wildlife, crofting communities and undeveloped horizons creates a landscape experience that is increasingly rare and internationally significant.

The scale and proximity of the proposed Spiorad na Mara Offshore Wind Farm would

fundamentally alter that experience. Turbines of this height and density, positioned unusually close to shore, would introduce a dominant industrial presence into what is currently a largely natural seascape.

In my view, this is not a minor visual change, but a profound transformation of place.

The west coast of Lewis derives much of its cultural, environmental and tourism value precisely from the fact that it has remained relatively free from large-scale industrialisation. Once such landscapes are altered at this scale, the change cannot easily be undone, even if the infrastructure is eventually removed decades into the future.

While I recognise the importance of renewable energy and the transition toward lower-carbon infrastructure, I do not believe that every landscape is equally appropriate for industrial-scale development. Sensitive island environments of this character and significance should attract an especially high degree of precaution and protection.

I therefore believe that the long-term environmental, cultural and landscape cost of this proposal would be disproportionate and deeply regrettable.

[Redacted]

Yours faithfully,

[Redacted]

Member of the public 1195

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

Dear Sir/Madam

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

One of the key issues is that the application does not present an adequate evidential basis necessary for a lawful determination. It is evident that critical environmental data is absent, and the baseline information provided is both limited and inconsistent. Furthermore, essential elements of the proposal remain undefined, which hinders the ability to assess potential impacts accurately. The reliance on a flexible design framework obscures an understanding of likely significant effects, while the unspecified mitigation measures leave their effectiveness uncertain. Consequently, the existing documentation fails to deliver a comprehensive understanding of the environmental, cultural, or community implications, and assertions of negligible or non-significant effects lack robust supporting evidence.

Moreover, the proposal conflicts with several policies, showcasing inconsistencies with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This is particularly evident with respect to biodiversity, natural habitats, cultural heritage, and public health and wellbeing. The application has not adequately demonstrated compliance with national obligations aimed at protecting biodiversity, climate interests, and environmental integrity. These policy conflicts are central to the statutory tests required for consent and fundamentally undermine the competent authority's ability to deem the development acceptable from a policy perspective.

The unprecedented scale of the proposal introduces substantial concerns related to landscape capacity, visual dominance, and environmental impact, especially given the positioning of large turbines in close proximity to the shoreline. When considering the lack of adequate information, reliance on undefined mitigation strategies, evidential shortcomings, and evident policy non-compliance, it is clear that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is lacking in material aspects and does not offer a complete, transparent, or reliable assessment of the potential environmental effects related to the proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations for turbines, creates substantial uncertainty. This uncertainty undermines the assessment's integrity and results in the presented impacts potentially not reflecting the actual development that will be constructed. Consequently, both the public and the competent authority are unable to gauge the true scale of environmental effects.

The application places considerable reliance on mitigation measures, monitoring strategies, and management plans that have yet to be defined. By seeking consent under the premise that environmental harm will be resolved in the future, the application restricts any meaningful assessment of effectiveness or evaluation of residual impacts. This postponement of crucial information to post-consent phases is procedurally improper and at odds with the aims of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies are clearly established before determination.

Additionally, the application suffers from significant evidential shortcomings, such as gaps in baseline data, methodological limitations, and reliance on assumptions instead of site-specific evidence. These shortcomings lead to uncertainty concerning the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are made without adequate supporting data. The lack of sufficient information impedes a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that is incompatible with statutory requirements.

As a result, the application does not meet the evidential threshold mandated by the Habitats Regulations, which is necessary to rule out adverse effects beyond reasonable scientific doubt. This necessitates the application of the precautionary principle, particularly regarding protected species and sensitive habitats. Moreover, the proposal fails to demonstrate compliance with 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 appropriate safeguards are established.

In summary, the reliance on an unspecified design envelope, the absence of defined mitigation measures, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies hinder a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make a decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application presents significant deficiencies in the assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and evidence-based comparison of realistic alternatives based on their environmental impacts, it provides a narrative that details the project's evolution. This narrative approach does not adequately demonstrate that less harmful options have been effectively identified, assessed, and chosen over more damaging solutions.

Furthermore, there is a lack of transparent comparison regarding alternative offshore locations, development scales, or design configurations. Specifically, the assessment does not indicate that the developer has properly considered the option of placing turbines further offshore, where potential visual, ecological, and coastal impacts could be lessened. Considering the sensitivity of the West Lewis coastline and the critical role that proximity to shore plays in determining impact, the absence of such analysis raises serious questions about whether the proposed siting truly represents the least damaging option available.

The inadequacies also extend to the evaluation of cable routing and landfall assessments, as there is insufficient evidence that alternative routes have been adequately explored to minimise impacts on sensitive receptors. This includes areas of significant cultural and spiritual value, such as Barvas Cemetery. The lack of a clear strategy for avoidance and the absence of comparative analysis suggest that mitigation by design has not been adequately considered, with an undue reliance on post-design mitigation measures instead.

As a consequence, the application does not establish that environmental harm has been minimised through careful site selection, layout, and routing of infrastructure. This represents a failure to adhere to the established mitigation hierarchy and prevents the competent authority from determining whether less harmful and more suitable alternatives are available. In the absence of a thorough alternatives assessment, it cannot be concluded that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, these deficiencies undermine adherence to National Planning Framework 4, particularly concerning the protection of natural environments, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a significant oversight that supports the conclusion that the application has not undergone sufficient evaluation and cannot warrant a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fraught with significant deficiencies, leading to an incomplete and unreliable understanding of the ecological receptors in the West Lewis coastal environment. This region is recognised as a sensitive and biologically active marine system, yet the baseline data provided is insufficient. The methodologies employed fail to adequately capture the presence, behaviour, and habitat use of the species within this ecosystem. As a consequence, the assessment does not furnish a credible evidential basis for evaluating potential

impacts.

A critical oversight involves otters, which are classified as a European Protected Species. The application neglects to appropriately recognise and assess their active utilisation of coastal areas for foraging and movement. This omission regarding their core foraging range and behavioural patterns means that the potential impacts of construction disturbance, noise, and increased activity have not been thoroughly evaluated. Such shortcomings undermine any assertions regarding the absence of significant effects on this species.

Further issues emerge in the evaluation of basking sharks, as the reliance on aerial surveys introduces notable detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence, especially when compared to established land-based observations that indicate frequent use of these waters. The failure to incorporate or adequately consider this data results in a deficient baseline, thereby weakening the reliability of the conclusions presented.

These methodological shortcomings mean that any conclusions drawn concerning negligible or non-significant effects are based on assumptions rather than solid evidence. Moreover, the lack of comprehensive baseline data obstructs a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This generates uncertainty about the actual level of risk posed to marine species and habitats.

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

Ultimately, the amalgamation of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These deficiencies impede a thorough evaluation of impacts on marine ecology and protected species, contributing to the overarching conclusion that the application lacks a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. 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 assessment of the application is fundamentally flawed, particularly concerning the treatment of the West Lewis coastline. This area is a dynamic cultural landscape where environment, language, tradition, and community are interwoven. Instead of recognising this interconnectedness, the application adopts a reductive view that portrays cultural heritage as merely a collection of static assets, neglecting their active social, cultural, and spiritual roles within the community.

A notable shortcoming is the handling of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active locations for burial and spiritual practice, yet the assessment treats them as fixed features, ignoring their ongoing use and significance. This misrepresentation leads to an inadequate understanding of cultural impacts and overlooks the vital role these sites play in community life.

Moreover, the assessment fails to address intangible cultural heritage, including the Gaelic language, local traditions, and the longstanding connection between the community and the coastal environment. These elements are integral to the identity of the area, yet they are entirely omitted from the evaluation, creating a significant gap in understanding the cultural implications of the development.

Concerns also arise regarding the rights of the community and their engagement in the process. The Gaelic-speaking population possesses a unique cultural identity akin to that of an Indigenous People, but the absence of a Free, Prior and Informed Consent process compromises the integrity of the assessment. This lack of meaningful participation undermines the legitimacy of the findings and disregards established principles of engaging communities in decisions that affect their cultural and environmental interests.

Another critical procedural deficiency is the non-compliance with the statutory requirement for an Island Communities Impact Assessment as stipulated in the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot adequately evaluate the social, cultural, and economic implications for the island community, thereby rendering any determination unlawful.

From a policy standpoint, these failures place the proposal in 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 disregard for living cultural practices, clearly deviates from established policy requirements.

In summary, the overall lack of assessment concerning living heritage, intangible cultural value, community rights, and adherence to statutory obligations leads to a significant evidential gap. The application has not properly assessed the cultural impacts of the development, resulting in an insufficient basis for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

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

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

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, seascape, and landscape is significantly lacking and does not sufficiently address the sensitivity of the environment or the scale of change. 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, situated close to the shoreline, would result in a continuous and prominent industrial presence, fundamentally changing this character and leading to a permanent transformation of

the landscape.

The application does not fully capture the extent of this visual alteration. Due to the scale and proximity of the turbines, they would dominate the views from residential areas, historic sites, and popular coastal locations. This would have a direct effect on visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment fails to adequately communicate the significance of this impact within the context of such a sensitive landscape.

Methodological issues also arise from the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not adequately reflect the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the risk that the actual visual impact has been underestimated, which undermines the credibility of the assessment.

Additionally, the assessment neglects to consider the interconnectedness of landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape context, linked visually and spatially to the Atlantic horizon. Rather than acknowledging their interdependence, the assessment treats these as isolated features, resulting in an incomplete understanding of the impacts on their setting and cultural significance.

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal involves substantial seabed preparation and installation works in 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 provided. Instead, the application relies on mitigation and contingency measures that would be prepared after consent, which prevents any meaningful evaluation of their adequacy or effectiveness.

Given the sensitivity of the receiving environment, this reliance on undefined future measures is particularly concerning. The West Lewis coastline supports clean coastal waters and important habitats that are vulnerable to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide sufficient detail on prevention, control, or monitoring measures.

Uncertainty regarding the scale and behaviour of sediment plumes from seabed disturbance and cable installation further complicates the situation. Without robust modelling and clearly defined management strategies, it is impossible to determine the extent, duration, or ecological effects of these impacts. This uncertainty also extends to the potential effects on marine species and habitats identified as sensitive within the wider assessment.

The absence of detailed emergency response procedures exacerbates these issues. By deferring contingency planning to a post-consent stage, the application prevents an evaluation of whether appropriate safeguards are in place to respond to pollution events. This introduces procedural risk and undermines the authority's ability to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards conflicts with the requirements of the Environmental Impact Assessment regime. Likely significant effects and mitigation must be assessed before consent, and the lack of such information means a lawful determination cannot be made. Additionally, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The proposal's assessment of marine life and fisheries is fundamentally inadequate, failing to provide a thorough examination of both ecological and socio-economic implications. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing industry, yet the application does not adequately ensure that these vital habitats and activities will remain protected and maintained without

considerable disruption.

A notable concern is the unsubstantiated assumption that fishing activities can be displaced without repercussions. There is a lack of evidence indicating that alternative fishing grounds are available, accessible, or able to accommodate any increased pressure from displaced fishing. This absence of information is critical, as such displacement could lead to overfishing in other areas and may result in broader economic ramifications for the local fishing fleet. Without a detailed and evidence-based evaluation, the implications for fisheries and local livelihoods are not fully understood.

Moreover, the proposal poses significant threats to marine species, particularly due to the underwater noise generated during construction activities. The use of high-energy hammer piling over an extended period is anticipated to cause disturbance across considerable distances, impacting species including dolphins. The forecasted disturbance to a substantial portion of the local bottlenose dolphin population raises alarming concerns, yet the application minimizes the importance of these effects without adequate supporting evidence.

Inconsistencies within the application are evident, as it acknowledges the necessity for licenses to permit harm to European Protected Species while simultaneously characterising impacts as negligible. This contradiction diminishes the credibility of the assessment and raises alarms regarding adherence to the Habitats Regulations, especially when harm is expected to an extent that warrants legal authorization.

The assessment also neglects to account for cumulative impacts stemming from various pressures, such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough assessment of these interconnected effects, the overall impact on marine ecosystems and socio-economic conditions remains undetermined.

From a policy standpoint, the application does not illustrate conformity with the National Planning Framework 4 or the National Marine Plan. It fails to establish that the development can coexist with current marine users or evade unacceptable impacts on marine biodiversity, making it impossible to conclude that the proposal is sustainable.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is fundamentally lacking and does not adequately address the full scope of impacts associated with what constitutes a single integrated project. The interconnected nature of the offshore turbines and onshore works is not reflected in the evaluation, which treats them separately, thereby

obscuring the true extent of environmental and socio-economic consequences.

Significant onshore elements, including cabling across protected moorland, the construction of a substation near Stornoway, and the associated access infrastructure, traverse sensitive landscapes. These undertakings involve excavations in areas of deep peat, particularly in Barvas Moor, a crucial carbon store and ecologically sensitive habitat. The application fails to deliver a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By excluding or delaying the evaluation of onshore impacts, the application impedes a proper appraisal of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively; however, the division between offshore and onshore elements leads to an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

The proposal raises additional serious concerns about sensitive habitats, such as machair systems and peatland environments, which are safeguarded by policy. The application does not convincingly demonstrate that impacts on these habitats have been fully evaluated or that suitable avoidance measures have been put in place. This results in a significant evidential gap concerning biodiversity protection.

Furthermore, the disturbance of peatland poses a risk to carbon balance, as it releases stored carbon and could lead to a carbon debt that contradicts the goals of renewable energy development. The application inadequately addresses this critical issue and fails to show that the overall carbon balance remains advantageous.

The routing of infrastructure through active croft land also introduces potential conflicts with existing land use and legal rights. The application lacks evidence that the required consents or processes have been initiated, raising serious concerns regarding the project's deliverability and lawful implementation.

From a policy standpoint, the failure to assess the project comprehensively and to demonstrate the protection of peatlands, habitats, and land use interests stands in conflict 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.

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

DARK SKIES AND NOCTURNAL WILDLIFE

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

cultural identity, and tourism value.

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

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

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

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

From a policy standpoint, the absence of this assessment conflicts with National Planning Framework 4, which aims to protect natural places and uphold environmental quality. This oversight also weakens the overall analysis of landscape and seascape impacts, as night-time character is a crucial aspect of the environment.

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

TOURISM

The assessment regarding tourism impacts is seriously lacking, as it does not address the economic and social repercussions for a vital sector of the Isle of Lewis economy. The local tourism industry relies heavily on the area's wild coastline, nearly untouched landscapes, dark skies, and the feeling of seclusion. While the application notes that 86% of visitors are attracted by the scenery, it fails to provide a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contributions of this sector.

Tourism has seen considerable growth, rising from £65 million in 2017 to over £81.5

million, generating more than 1,000 jobs and representing up to 16% of the island's economy. However, the application does not consider how the industrialisation of the seascape and degradation of environmental quality would affect Tourism Gross Value Added or the broader economic resilience. Without this critical analysis, it remains uncertain whether the proposed development would provide a net economic advantage or hinder an established and expanding sector.

Additionally, the assessment overlooks the significance of environmental quality in bolstering tourism. It fails to recognise how unspoiled landscapes and dark skies enhance visitor experiences, particularly in growing markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, leading to a substantial gap in understanding the effects on a crucial and evolving aspect of the local economy.

In an island community that has limited economic diversification, the neglect of tourism impact assessments carries broader implications for employment, local businesses, and community sustainability. The absence of an adequate Island Communities Impact Assessment means that these economic vulnerabilities have not been evaluated as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application fails to demonstrate adherence to National Planning Framework 4, especially concerning economic impact and the necessity to illustrate net benefits. It contradicts strategic objectives that prioritise tourism as a growth sector and does not present enough evidence for the competent authority to evaluate the economic consequences of the proposal.

In summary, the inability to quantify tourism impacts, assess the environmental factors influencing visitor behaviours, and consider the economic dependencies of the island culminates in a significant evidential gap. This deficiency hampers a thorough evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal does not meet the requirements for sustainable development when evaluated against statutory duties, national policy, and evidential standards. The application brings forth the same core issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. Now, it is being presented under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant gaps in the application's evidential basis. It lacks complete baseline data and continues to utilise an undefined design envelope. Additionally, it relies on unspecified mitigation measures and fails to address key impact pathways, such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism. The Environmental Impact Assessment is incomplete, which hinders a comprehensive

understanding of potential significant effects or residual impacts.

Procedural failures are also evident. The absence of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the failure to provide a full Social Impact Assessment is a notable omission. These issues obstruct the competent authority from properly evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal conflicts with National Planning Framework 4. It fails to ensure the protection of biodiversity, natural places, and cultural heritage, does not establish that health and wellbeing impacts are acceptable, and lacks evidence of net economic benefit due to the absence of tourism impact modelling. The cumulative impacts of both offshore and onshore elements have not been thoroughly assessed, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

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

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

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

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

Additional Comments

I have been a resident on the Isle of Lewis for thirty years and regularly visited for the previous
twenty years. It is a unique Island not suited to large scale development.
The desecration at sea and on the Island itself in all its aspects is unjustifiable.

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: BE909084

Member of the public 1196

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 processes. Concerns arise from a review of the Environmental Impact Assessment Report and accompanying documents that reveal significant deficiencies related to planning, environmental considerations, cultural aspects, and procedural elements. The proposed development is situated off the west coast of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The proposal's scale, proximity to the shoreline, and design raise serious questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis necessary for a lawful decision. There are critical gaps in environmental data, and the baseline information is both limited and inconsistent, leaving key components of the proposal inadequately defined. The flexible design framework employed obscures a clear understanding of potential significant effects, while the reliance on unspecified mitigation measures makes it impossible to assess their effectiveness. Consequently, the documentation fails to provide a complete or informed view of the environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects are not backed by solid evidence.

Moreover, the proposal reveals clear and substantial conflicts with policy. It appears to be at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate the capacity to meet national obligations for the protection of biodiversity, climate interests, and environmental integrity. Such conflicts are critical to the statutory tests needed for consent and severely hinder the competent authority's ability to determine the proposal's acceptability within policy frameworks.

The unprecedented scale of the proposal raises additional concerns about landscape capacity, visual impact, and environmental repercussions. The large turbines positioned near the shoreline are of particular concern, as they threaten to dominate the landscape visually and ecologically. In light of the insufficient information provided, the reliance on undefined mitigation measures, and the evident policy non-compliance, it is clear that the application is incomplete and cannot support a lawful determination. Given these circumstances, it is essential to invoke the precautionary principle.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment lacks a complete and reliable understanding of marine ecology and protected species within the West Lewis coastal environment, which is a biologically active and sensitive marine system. The methodologies used are insufficient and do not adequately capture the presence, behaviour, and habitat use of species, leading to an incomplete baseline data set. Consequently, this undermines the assessment's ability to provide a sound evidential basis for evaluating potential impacts.

A significant oversight in the application is the failure to properly recognise and assess the active use of coastal areas by otters, a European Protected Species, for foraging and movement. This gap in consideration regarding their core foraging range and behavioural patterns means that the potential effects of construction disturbance, noise, and increased activity on otters have not been adequately evaluated. Therefore, the conclusions drawn about the absence of significant effects on this species are undermined.

Additionally, the assessment of basking sharks suffers from reliance on aerial surveys, which introduce considerable detection bias, particularly under Atlantic conditions. This method likely underestimates the presence of these sharks when compared to established land-based observations that indicate frequent use of the area. The failure to incorporate or properly consider such relevant data further weakens the reliability of the conclusions presented.

The methodological deficiencies result in conclusions of negligible or non-significant effects being based on assumptions rather than solid evidence. The lack of sufficient baseline data also hampers meaningful assessments of cumulative and indirect impacts, which includes seasonal variation and wider ecosystem interactions. This creates uncertainty regarding the actual risks to marine species and habitats.

From a regulatory standpoint, the application does not comply with the Environmental Impact Assessment regime and National Planning Framework 4, as it has not adequately identified or assessed protected species. The uncertainty introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt, which engages the precautionary principle. In light of these issues, it is clear that consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the ornithological impact is fundamentally flawed and presents significant inconsistencies and gaps in evidence that seriously undermine its findings. The development site is situated within crucial foraging areas and migratory corridors on the west coast of the Isle of Lewis, which hosts internationally significant seabird

populations that are already in decline. However, the application does not adequately demonstrate that these species will not be adversely affected, failing to meet the required evidential standards.

Moreover, the application contains a fundamental contradiction; it asserts that there will be no significant adverse effects, while simultaneously proposing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment and suggests that the conclusions drawn are not underpinned by the necessary evidence.

The assessment falls short in demonstrating that seabirds associated with protected areas such as the Lewis Peatlands and St Kilda will be unaffected. The significance of these feeding grounds is inadequately considered, and the reliance on modelling techniques introduces uncertainty, particularly for species like Kittiwakes and Fulmars that are already facing severe declines. The methodologies utilised are likely to underestimate mortality rates, especially given the lack of comprehensive baseline data and an incomplete understanding of behavioural responses.

The placement of turbines within a known migratory corridor poses an additional risk, effectively creating a barrier in a primary flight path used by migratory species travelling between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor and its potential impacts on species with limited global populations have not been adequately assessed.

From a regulatory standpoint, the application does not fulfil the evidential threshold necessary to ascertain that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, along with gaps in data and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been reached. This invokes the precautionary principle, which prevents a lawful conclusion in favour of consent.

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

In conclusion, the assessment lacks reliability due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. These shortcomings hinder a thorough evaluation of impacts and lead to the overall determination that the application fails to meet the statutory requirements essential for its approval.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline embodies a dynamic cultural landscape where environment, language, tradition, and community are interwoven. However, the current assessment of cultural heritage and community identity is fundamentally inadequate, treating

heritage as mere isolated and static assets. This perspective neglects the ongoing social, cultural, and spiritual significance these heritage elements hold within the community.

Particularly concerning is the handling of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places for burial and spiritual practices, yet the assessment inaccurately categorises them as static features. By failing to acknowledge their continued use and the impact of development on their surroundings, the evaluation of cultural effects remains incomplete, overlooking their essential role in community life.

Moreover, the assessment does not take into account intangible cultural heritage, including the Gaelic language, traditions, and the long-standing bond between the community and the coastal environment. These aspects are vital to the identity of the area and are glaringly absent from the assessment, indicating a significant oversight. The lack of consideration for these elements means that the cultural implications of the development cannot be fully understood.

Additionally, there are serious concerns about community rights and engagement. The Gaelic-speaking community has a unique cultural identity that aligns with characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This absence of genuine engagement diminishes the credibility of the assessment and overlooks essential principles of participation in matters affecting cultural and environmental interests.

A vital procedural shortcoming is the failure to conduct a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. Without this assessment, the relevant authority is unable to meet its legal obligations to consider the social, cultural, and economic impacts on the island community. This failure alone obstructs lawful determination.

From a policy standpoint, these shortcomings create a direct conflict with the National Planning Framework 4, particularly concerning the protection of historical assets and places. The neglect of both tangible and intangible heritage and the disregard for living cultural practices signify a clear deviation from policy requirements.

In summary, the oversight of living heritage, intangible cultural values, community rights, and statutory responsibilities leads to a significant evidential gap. The cultural impacts associated with the development have not been adequately assessed, resulting in an application that lacks a solid foundation for understanding the true cultural costs of the proposal.

CONSTRUCTION AND POLLUTION RISKS

The proposal involves significant seabed preparation and installation works within the Atlantic's high-energy environment. However, the assessment of construction and pollution risks is inadequate and lacks the necessary detail to evaluate potential

environmental effects. The application fails to present fully developed Construction Environmental Management Plans or Pollution Prevention Plans, instead relying on mitigation and contingency measures that are to be formulated after consent is granted. This approach hinders any substantial assessment of their potential effectiveness or adequacy.

The reliance on unspecified future measures raises serious concerns, particularly given the delicate nature of the receiving environment. The West Lewis coastline is known for its clean coastal waters and vital habitats, both of which are at risk from sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and the possibility of chemical or oil spills, it does not sufficiently outline how these risks will be prevented, controlled, or monitored.

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

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

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

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

FISHERIES AND MARINE LIFE

The proposal raises significant concerns regarding the assessment of fisheries and marine life, which appears insufficient and lacks a comprehensive evaluation of ecological and socio-economic impacts. The waters off the West Lewis coast host a diverse marine ecosystem alongside an active fishing industry. However, the application fails to adequately demonstrate how these habitats and uses can be

protected or maintained without significant disruption.

A critical issue is the assumption that fishing activity can be displaced without repercussions. There is no evidence provided that alternative fishing grounds exist, are accessible, or can withstand additional pressure. This notable omission is consequential, as such displacement threatens to exacerbate overfishing in other areas and could lead to broader economic implications for the local fishing fleet. Without a thorough and evidence-based assessment, the potential impacts on fisheries and the livelihoods dependent on them remain unclear.

Moreover, the proposal presents considerable risks to marine species, notably through underwater noise produced during construction activities. The use of high-energy hammer piling over extended periods is likely to create disturbances that affect marine life over large distances, with particular concern for species like dolphins. The projected disturbance to a significant proportion of the local bottlenose dolphin population raises serious issues, yet the application appears to downplay the importance of these effects, lacking adequate supporting evidence.

The application exhibits a clear inconsistency by acknowledging the need for licences to permit harm to European Protected Species while simultaneously describing impacts as negligible. This contradiction diminishes the credibility of the assessment and raises serious concerns regarding compliance with the Habitats Regulations, especially where anticipated harm requires legal authorisation.

Furthermore, the assessment does not adequately address cumulative impacts arising from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a holistic evaluation of these interconnected effects, determining the overall impact on marine ecosystems and socio-economic conditions is unfeasible.

From a policy perspective, the application fails to demonstrate compliance with the National Planning Framework 4 or the National Marine Plan. It does not provide evidence that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, which undermines any conclusion regarding the sustainability of the proposal.

In summary, the deficiencies in evidence surrounding 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 application presents an incomplete assessment of onshore infrastructure, failing to consider the full scope of impacts associated with what constitutes a single integrated project. The offshore turbines and onshore works are interlinked; however, the assessment treats them separately, which results in a fragmented analysis that

obscures the overall environmental and socio-economic effects.

Significant risks are posed to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application has not adequately demonstrated that the impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been implemented, creating an evidential gap regarding biodiversity protection.

Moreover, the onshore components include cabling across protected moorland, the construction of a substation near Stornoway, and access infrastructure that traverses sensitive landscapes. These works involve excavation in areas of deep peat, particularly in Barvas Moor, which serves as a significant carbon store and ecologically sensitive habitat. The failure to provide a comprehensive assessment of these impacts inhibits a complete understanding of the project's overall environmental footprint.

The lack of consideration for cumulative effects is evident, as the application has either excluded or deferred assessment of onshore impacts. The Environmental Impact Assessment process necessitates that all components of a project be evaluated collectively. The fragmented treatment of offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities remain unclear.

Concerns are also raised regarding the carbon balance. The disturbance of peatland can lead to the release of stored carbon, potentially resulting in a carbon debt that contradicts the aims of renewable energy development. The application has not sufficiently addressed this matter or shown that the overall carbon balance remains advantageous.

Furthermore, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is no evidence presented that necessary consents or processes have been initiated, calling into question 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 the National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further undermines 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 result in this part of the application being incomplete and unreliable, which prevents lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment contains a significant gap, as it fails to address the crucial aspects of dark skies and nocturnal wildlife. The West Lewis coastline, known for its exceptionally dark skies, is vital for environmental quality, cultural

identity, and tourism. The proposal introduces permanent red aviation lighting that would create a persistent and disruptive “wall of light” across the western horizon, fundamentally altering the night-time environment.

The application neglects to evaluate how this lighting impacts visual amenity, landscape character, or the experiences of both residents and visitors. This oversight is particularly concerning given the role of dark skies in the area's identity and the potential growth of sectors such as astro-tourism. This failure to assess such impacts results in a clear deficiency in the overall landscape and environmental evaluation.

Moreover, there is a lack of consideration for the effects on nocturnal wildlife. Certain species, including Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel, are notably sensitive to artificial lighting, which can lead to disorientation and a heightened risk of collisions. The absence of any lighting impact assessment or a study on phototaxis means there is no evaluation of how aviation lighting might affect these species or increase mortality rates.

The reliance on daytime survey data in the ornithological assessment further compounds this issue, as it does not adequately capture nocturnal activities or associated risks. Other species, such as Kittiwakes, which may forage or migrate during the night, are equally at risk of disorientation from artificial lighting, yet this has not been assessed. Without site-specific night-time data, the understanding of ecological impacts remains critically deficient.

Assessing nocturnal impacts is essential for determining whether protected species or designated sites might be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt cannot be satisfied, thereby invoking the precautionary principle and obstructing a lawful determination.

From a policy standpoint, the absence of this assessment contradicts the National Planning Framework 4's directives regarding the protection of natural places and environmental quality. Furthermore, it diminishes the overall evaluation of landscape and seascape impacts, as the character of night-time is a fundamental aspect of the environment.

In summary, the lack of any evaluation concerning dark skies and nocturnal wildlife represents a significant evidential gap. The deficiencies in baseline data, impact modelling, and species-specific analysis render the application incomplete and incapable of substantiating a lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm highlights a significant failure to meet the standards of sustainable development in light of statutory obligations, national policy, and evidential requirements. This application revisits the fundamental concerns that resulted in the denial of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Despite now being submitted

under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it still falls short.

There are critical deficiencies in the evidential basis necessary for a thorough assessment. Key baseline data is missing, the design envelope is not clearly defined, and the proposed mitigation measures lack specificity. Furthermore, the application omits crucial impact pathways, such as those affecting nocturnal wildlife, the full scope of onshore infrastructure, and potential tourism impacts. Consequently, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of likely significant effects and residual impacts.

Procedural shortcomings are also evident. The lack of a compliant Island Communities Impact Assessment contravenes statutory obligations established under the Islands (Scotland) Act 2018. Additionally, the failure to present a complete Social Impact Assessment represents a serious omission. These lapses obstruct the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal is at odds with the National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural habitats, and cultural heritage. There is insufficient evidence to confirm that the impacts on health and wellbeing are acceptable, nor does it provide a net economic benefit due to the lack of tourism impact analysis. The cumulative impact of both offshore and onshore components has not been appropriately evaluated, which obscures understanding of the effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. Incomplete assessments of marine ecology, seabirds, protected species, and marine mammals introduce inconsistencies. The necessary evidential threshold to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and obstructing any lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The extent of informational deficiencies, coupled with conflicts with policy and unresolved environmental concerns, obstructs a lawful and evidence-based decision. It is imperative that the competent authority either refuses consent based on these grounds or invokes the appropriate regulatory provisions to demand the submission of the missing information.

Thus, I formally request that the application for the Spiorad na Mara Offshore Wind Farm 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: 9C9B9F8A

Member of the public 1197

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 processes. Concerns arise from a review of the Environmental Impact Assessment Report and accompanying documents that reveal significant deficiencies related to planning, environmental considerations, cultural aspects, and procedural elements. The proposed development is situated off the west coast of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The proposal's scale, proximity to the shoreline, and design raise serious questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis necessary for a lawful decision. There are critical gaps in environmental data, and the baseline information is both limited and inconsistent, leaving key components of the proposal inadequately defined. The flexible design framework employed obscures a clear understanding of potential significant effects, while the reliance on unspecified mitigation measures makes it impossible to assess their effectiveness. Consequently, the documentation fails to provide a complete or informed view of the environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects are not backed by solid evidence.

Moreover, the proposal reveals clear and substantial conflicts with policy. It appears to be at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate the capacity to meet national obligations for the protection of biodiversity, climate interests, and environmental integrity. Such conflicts are critical to the statutory tests needed for consent and severely hinder the competent authority's ability to determine the proposal's acceptability within policy frameworks.

The unprecedented scale of the proposal raises additional concerns about landscape capacity, visual impact, and environmental repercussions. The large turbines positioned near the shoreline are of particular concern, as they threaten to dominate the landscape visually and ecologically. In light of the insufficient information provided, the reliance on undefined mitigation measures, and the evident policy non-compliance, it is clear that the application is incomplete and cannot support a lawful determination. Given these circumstances, it is essential to invoke the precautionary principle.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment lacks a complete and reliable understanding of marine ecology and protected species within the West Lewis coastal environment, which is a biologically active and sensitive marine system. The methodologies used are insufficient and do not adequately capture the presence, behaviour, and habitat use of species, leading to an incomplete baseline data set. Consequently, this undermines the assessment's ability to provide a sound evidential basis for evaluating potential impacts.

A significant oversight in the application is the failure to properly recognise and assess the active use of coastal areas by otters, a European Protected Species, for foraging and movement. This gap in consideration regarding their core foraging range and behavioural patterns means that the potential effects of construction disturbance, noise, and increased activity on otters have not been adequately evaluated. Therefore, the conclusions drawn about the absence of significant effects on this species are undermined.

Additionally, the assessment of basking sharks suffers from reliance on aerial surveys, which introduce considerable detection bias, particularly under Atlantic conditions. This method likely underestimates the presence of these sharks when compared to established land-based observations that indicate frequent use of the area. The failure to incorporate or properly consider such relevant data further weakens the reliability of the conclusions presented.

The methodological deficiencies result in conclusions of negligible or non-significant effects being based on assumptions rather than solid evidence. The lack of sufficient baseline data also hampers meaningful assessments of cumulative and indirect impacts, which includes seasonal variation and wider ecosystem interactions. This creates uncertainty regarding the actual risks to marine species and habitats.

From a regulatory standpoint, the application does not comply with the Environmental Impact Assessment regime and National Planning Framework 4, as it has not adequately identified or assessed protected species. The uncertainty introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt, which engages the precautionary principle. In light of these issues, it is clear that consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the ornithological impact is fundamentally flawed and presents significant inconsistencies and gaps in evidence that seriously undermine its findings. The development site is situated within crucial foraging areas and migratory corridors on the west coast of the Isle of Lewis, which hosts internationally significant seabird

populations that are already in decline. However, the application does not adequately demonstrate that these species will not be adversely affected, failing to meet the required evidential standards.

Moreover, the application contains a fundamental contradiction; it asserts that there will be no significant adverse effects, while simultaneously proposing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment and suggests that the conclusions drawn are not underpinned by the necessary evidence.

The assessment falls short in demonstrating that seabirds associated with protected areas such as the Lewis Peatlands and St Kilda will be unaffected. The significance of these feeding grounds is inadequately considered, and the reliance on modelling techniques introduces uncertainty, particularly for species like Kittiwakes and Fulmars that are already facing severe declines. The methodologies utilised are likely to underestimate mortality rates, especially given the lack of comprehensive baseline data and an incomplete understanding of behavioural responses.

The placement of turbines within a known migratory corridor poses an additional risk, effectively creating a barrier in a primary flight path used by migratory species travelling between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor and its potential impacts on species with limited global populations have not been adequately assessed.

From a regulatory standpoint, the application does not fulfil the evidential threshold necessary to ascertain that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, along with gaps in data and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been reached. This invokes the precautionary principle, which prevents a lawful conclusion in favour of consent.

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

In conclusion, the assessment lacks reliability due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. These shortcomings hinder a thorough evaluation of impacts and lead to the overall determination that the application fails to meet the statutory requirements essential for its approval.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline embodies a dynamic cultural landscape where environment, language, tradition, and community are interwoven. However, the current assessment of cultural heritage and community identity is fundamentally inadequate, treating

heritage as mere isolated and static assets. This perspective neglects the ongoing social, cultural, and spiritual significance these heritage elements hold within the community.

Particularly concerning is the handling of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places for burial and spiritual practices, yet the assessment inaccurately categorises them as static features. By failing to acknowledge their continued use and the impact of development on their surroundings, the evaluation of cultural effects remains incomplete, overlooking their essential role in community life.

Moreover, the assessment does not take into account intangible cultural heritage, including the Gaelic language, traditions, and the long-standing bond between the community and the coastal environment. These aspects are vital to the identity of the area and are glaringly absent from the assessment, indicating a significant oversight. The lack of consideration for these elements means that the cultural implications of the development cannot be fully understood.

Additionally, there are serious concerns about community rights and engagement. The Gaelic-speaking community has a unique cultural identity that aligns with characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This absence of genuine engagement diminishes the credibility of the assessment and overlooks essential principles of participation in matters affecting cultural and environmental interests.

A vital procedural shortcoming is the failure to conduct a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. Without this assessment, the relevant authority is unable to meet its legal obligations to consider the social, cultural, and economic impacts on the island community. This failure alone obstructs lawful determination.

From a policy standpoint, these shortcomings create a direct conflict with the National Planning Framework 4, particularly concerning the protection of historical assets and places. The neglect of both tangible and intangible heritage and the disregard for living cultural practices signify a clear deviation from policy requirements.

In summary, the oversight of living heritage, intangible cultural values, community rights, and statutory responsibilities leads to a significant evidential gap. The cultural impacts associated with the development have not been adequately assessed, resulting in an application that lacks a solid foundation for understanding the true cultural costs of the proposal.

CONSTRUCTION AND POLLUTION RISKS

The proposal involves significant seabed preparation and installation works within the Atlantic's high-energy environment. However, the assessment of construction and pollution risks is inadequate and lacks the necessary detail to evaluate potential

environmental effects. The application fails to present fully developed Construction Environmental Management Plans or Pollution Prevention Plans, instead relying on mitigation and contingency measures that are to be formulated after consent is granted. This approach hinders any substantial assessment of their potential effectiveness or adequacy.

The reliance on unspecified future measures raises serious concerns, particularly given the delicate nature of the receiving environment. The West Lewis coastline is known for its clean coastal waters and vital habitats, both of which are at risk from sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and the possibility of chemical or oil spills, it does not sufficiently outline how these risks will be prevented, controlled, or monitored.

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

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

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

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

FISHERIES AND MARINE LIFE

The proposal raises significant concerns regarding the assessment of fisheries and marine life, which appears insufficient and lacks a comprehensive evaluation of ecological and socio-economic impacts. The waters off the West Lewis coast host a diverse marine ecosystem alongside an active fishing industry. However, the application fails to adequately demonstrate how these habitats and uses can be

protected or maintained without significant disruption.

A critical issue is the assumption that fishing activity can be displaced without repercussions. There is no evidence provided that alternative fishing grounds exist, are accessible, or can withstand additional pressure. This notable omission is consequential, as such displacement threatens to exacerbate overfishing in other areas and could lead to broader economic implications for the local fishing fleet. Without a thorough and evidence-based assessment, the potential impacts on fisheries and the livelihoods dependent on them remain unclear.

Moreover, the proposal presents considerable risks to marine species, notably through underwater noise produced during construction activities. The use of high-energy hammer piling over extended periods is likely to create disturbances that affect marine life over large distances, with particular concern for species like dolphins. The projected disturbance to a significant proportion of the local bottlenose dolphin population raises serious issues, yet the application appears to downplay the importance of these effects, lacking adequate supporting evidence.

The application exhibits a clear inconsistency by acknowledging the need for licences to permit harm to European Protected Species while simultaneously describing impacts as negligible. This contradiction diminishes the credibility of the assessment and raises serious concerns regarding compliance with the Habitats Regulations, especially where anticipated harm requires legal authorisation.

Furthermore, the assessment does not adequately address cumulative impacts arising from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a holistic evaluation of these interconnected effects, determining the overall impact on marine ecosystems and socio-economic conditions is unfeasible.

From a policy perspective, the application fails to demonstrate compliance with the National Planning Framework 4 or the National Marine Plan. It does not provide evidence that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, which undermines any conclusion regarding the sustainability of the proposal.

In summary, the deficiencies in evidence surrounding 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 application presents an incomplete assessment of onshore infrastructure, failing to consider the full scope of impacts associated with what constitutes a single integrated project. The offshore turbines and onshore works are interlinked; however, the assessment treats them separately, which results in a fragmented analysis that

obscures the overall environmental and socio-economic effects.

Significant risks are posed to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application has not adequately demonstrated that the impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been implemented, creating an evidential gap regarding biodiversity protection.

Moreover, the onshore components include cabling across protected moorland, the construction of a substation near Stornoway, and access infrastructure that traverses sensitive landscapes. These works involve excavation in areas of deep peat, particularly in Barvas Moor, which serves as a significant carbon store and ecologically sensitive habitat. The failure to provide a comprehensive assessment of these impacts inhibits a complete understanding of the project's overall environmental footprint.

The lack of consideration for cumulative effects is evident, as the application has either excluded or deferred assessment of onshore impacts. The Environmental Impact Assessment process necessitates that all components of a project be evaluated collectively. The fragmented treatment of offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities remain unclear.

Concerns are also raised regarding the carbon balance. The disturbance of peatland can lead to the release of stored carbon, potentially resulting in a carbon debt that contradicts the aims of renewable energy development. The application has not sufficiently addressed this matter or shown that the overall carbon balance remains advantageous.

Furthermore, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is no evidence presented that necessary consents or processes have been initiated, calling into question 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 the National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further undermines 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 result in this part of the application being incomplete and unreliable, which prevents lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment contains a significant gap, as it fails to address the crucial aspects of dark skies and nocturnal wildlife. The West Lewis coastline, known for its exceptionally dark skies, is vital for environmental quality, cultural

identity, and tourism. The proposal introduces permanent red aviation lighting that would create a persistent and disruptive “wall of light” across the western horizon, fundamentally altering the night-time environment.

The application neglects to evaluate how this lighting impacts visual amenity, landscape character, or the experiences of both residents and visitors. This oversight is particularly concerning given the role of dark skies in the area's identity and the potential growth of sectors such as astro-tourism. This failure to assess such impacts results in a clear deficiency in the overall landscape and environmental evaluation.

Moreover, there is a lack of consideration for the effects on nocturnal wildlife. Certain species, including Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel, are notably sensitive to artificial lighting, which can lead to disorientation and a heightened risk of collisions. The absence of any lighting impact assessment or a study on phototaxis means there is no evaluation of how aviation lighting might affect these species or increase mortality rates.

The reliance on daytime survey data in the ornithological assessment further compounds this issue, as it does not adequately capture nocturnal activities or associated risks. Other species, such as Kittiwakes, which may forage or migrate during the night, are equally at risk of disorientation from artificial lighting, yet this has not been assessed. Without site-specific night-time data, the understanding of ecological impacts remains critically deficient.

Assessing nocturnal impacts is essential for determining whether protected species or designated sites might be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt cannot be satisfied, thereby invoking the precautionary principle and obstructing a lawful determination.

From a policy standpoint, the absence of this assessment contradicts the National Planning Framework 4's directives regarding the protection of natural places and environmental quality. Furthermore, it diminishes the overall evaluation of landscape and seascape impacts, as the character of night-time is a fundamental aspect of the environment.

In summary, the lack of any evaluation concerning dark skies and nocturnal wildlife represents a significant evidential gap. The deficiencies in baseline data, impact modelling, and species-specific analysis render the application incomplete and incapable of substantiating a lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm highlights a significant failure to meet the standards of sustainable development in light of statutory obligations, national policy, and evidential requirements. This application revisits the fundamental concerns that resulted in the denial of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Despite now being submitted

under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it still falls short.

There are critical deficiencies in the evidential basis necessary for a thorough assessment. Key baseline data is missing, the design envelope is not clearly defined, and the proposed mitigation measures lack specificity. Furthermore, the application omits crucial impact pathways, such as those affecting nocturnal wildlife, the full scope of onshore infrastructure, and potential tourism impacts. Consequently, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of likely significant effects and residual impacts.

Procedural shortcomings are also evident. The lack of a compliant Island Communities Impact Assessment contravenes statutory obligations established under the Islands (Scotland) Act 2018. Additionally, the failure to present a complete Social Impact Assessment represents a serious omission. These lapses obstruct the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal is at odds with the National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural habitats, and cultural heritage. There is insufficient evidence to confirm that the impacts on health and wellbeing are acceptable, nor does it provide a net economic benefit due to the lack of tourism impact analysis. The cumulative impact of both offshore and onshore components has not been appropriately evaluated, which obscures understanding of the effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. Incomplete assessments of marine ecology, seabirds, protected species, and marine mammals introduce inconsistencies. The necessary evidential threshold to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and obstructing any lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The extent of informational deficiencies, coupled with conflicts with policy and unresolved environmental concerns, obstructs a lawful and evidence-based decision. It is imperative that the competent authority either refuses consent based on these grounds or invokes the appropriate regulatory provisions to demand the submission of the missing information.

Thus, I formally request that the application for the Spiorad na Mara Offshore Wind Farm 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: 9C9B9F8A

Member of the public 1198

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 objection arises from a thorough examination of the Environmental Impact Assessment Report and accompanying materials, revealing significant deficiencies in planning, environmental, cultural, and procedural aspects. Situated off the west side of the Isle of Lewis, the development area is characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns are raised regarding the compatibility of the proposal's scale, proximity, and design with statutory obligations, national policy, and sustainable development principles.

The application lacks an adequate evidential basis necessary for a lawful assessment. There are critical gaps in environmental data, with baseline information that is both limited and inconsistent, while several key components of the proposal remain undefined. The application employs a flexible design framework, which complicates the understanding of potential significant effects, and the unspecified mitigation measures hinder any assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects lack robust evidential support.

Substantive policy conflicts are evident, with the proposal appearing inconsistent with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4. This inconsistency is particularly relevant concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not adequately demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly affect the statutory tests necessary for consent and impair the ability of the competent authority to determine the acceptability of the development in policy terms.

The unprecedented scale of the proposal raises serious concerns, particularly regarding the placement of large turbines in close proximity to the shoreline, which could significantly impact landscape capacity and create visual dominance. The combined effect of insufficient information, reliance on undefined mitigation measures, evidential weaknesses, and notable policy non-compliance underscores that the application is incomplete and unfit to support a lawful determination. In this context, the application of the precautionary principle is warranted.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally inadequate, failing to deliver a complete and reliable understanding of the ecological receptors in the West Lewis coastal environment. This region, known for its sensitivity and biological activity, is not well represented in the baseline data gathered. The methodologies employed do not effectively capture the presence, behaviour, and habitat usage of key species, which compromises the validity of the impact evaluations.

One glaring oversight is the treatment of otters, a species protected under European law. The application neglects to properly identify and assess their active use of coastal areas for foraging and movement. The failure to consider their core foraging range and behavioural habits means that the potential impacts of construction disturbance, noise, and increased activity remain inadequately evaluated. This omission significantly undermines claims regarding the absence of significant effects on otters.

Moreover, the assessment of basking sharks suffers from methodological flaws, particularly due to the reliance on aerial surveys that are prone to significant detection bias, especially under Atlantic conditions. This methodology likely results in an underrepresentation of their presence, in stark contrast to established land-based observations which indicate frequent usage of these waters. The disregard for or improper consideration of this crucial data further contributes to an incomplete baseline, compromising the reliability of the conclusions drawn.

These methodological shortcomings lead to conclusions about negligible or non-significant effects being based more on assumptions than on solid evidence. The lack of adequate baseline data obstructs any meaningful evaluation of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. Consequently, this introduces uncertainty regarding the actual risks faced by marine species and habitats.

From a regulatory standpoint, the application does not comply with the Environmental Impact Assessment requirements or the National Planning Framework 4, as it fails to accurately identify or assess protected species. The degree of uncertainty that arises prevents the possibility of ruling out adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. In light of these issues, it is clear that consent cannot be legally granted.

In summary, the combination of inadequate baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These critical deficiencies hinder a robust evaluation of impacts on marine ecology and protected species, culminating in the conclusion that the application lacks a sufficient evidential foundation.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage is significantly flawed and does not recognise the West Lewis coastline as a dynamic cultural landscape. Here, environment, language, tradition, and community are deeply intertwined. The

application takes a simplistic view, treating heritage as a collection of separate, unchanging assets instead of understanding their ongoing social, cultural, and spiritual significance within the community.

A major shortcoming is evident in how the assessment handles culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These cemeteries are active burial grounds and sites of spiritual practice, yet they are classified as static features. This approach neglects their continued use and the potential impacts of development on their surroundings. Such mischaracterisation leads to an incomplete understanding of the cultural implications and overlooks their vital role in community life.

Moreover, the assessment does not account for intangible cultural heritage, such as the Gaelic language, local traditions, and the community's enduring connection to the coastal environment. These aspects are fundamental to the area's identity but are completely omitted from the analysis, indicating a significant oversight. Without acknowledging these elements, the true cultural impact of the development remains unclear.

Concerns also arise regarding community engagement and rights. The Gaelic-speaking population has a distinct cultural identity, reflecting characteristics of an Indigenous People. However, there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the credibility of the assessment and fails to adhere to established principles for participation in decisions that impact cultural and environmental matters.

Additionally, there is a notable procedural failure due to the absence of a compliant Island Communities Impact Assessment, which is legally required under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot adequately evaluate the social, cultural, and economic consequences for the island community. This omission alone renders a lawful determination impossible.

From a policy standpoint, these shortcomings directly contradict the National Planning Framework 4, particularly regarding the preservation of historic assets and places. The neglect of both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, represents a stark deviation from policy expectations.

Overall, the disregard for living heritage, intangible cultural value, community rights, and statutory responsibilities results in a significant lack of evidence. The cultural impacts of the proposed development have not been appropriately assessed, and the application fails to provide a robust basis for determining the true cultural costs associated with the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped character, and a strong sense of remoteness. The assessment of seascape, landscape,

and visual impacts does not adequately reflect the significant changes that would occur, nor does it consider the sensitivity of the environment. The proposed large-scale turbines, situated in close proximity to the shoreline, would create a continuous and dominant industrial presence that fundamentally alters the character of the landscape, leading to a permanent and irreversible transformation.

Furthermore, the application does not sufficiently represent the magnitude of the visual changes that would arise. Due to their scale and proximity, the turbines would dominate views from residential areas, historic sites, and frequently visited coastal locations. This dominance would directly impact visual amenity and erode the essential qualities of naturalness and remoteness. The assessment fails to convey the significance of this impact within the context of such a sensitive landscape.

There are significant methodological concerns regarding the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints may not accurately represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This introduces the possibility that the magnitude of visual impact has been understated, which undermines the reliability of the assessment.

Additionally, the assessment neglects to address the interconnectedness of landscape, seascape, and cultural heritage. Notable sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape that is visually and spatially linked to the Atlantic horizon. By treating these heritage assets in isolation, the assessment fails to recognise their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal conflicts with National Planning Framework 4, specifically regarding the protection of natural places and historic assets. The scale of the proposed changes is incompatible with the requirement 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 compliance with policy.

Moreover, it is evident that the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would result in a presence that is dominant and unavoidable. Consequently, the changes anticipated are fundamental and permanent, rather than capable of being 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 interconnected nature of landscape and heritage. These deficiencies prevent a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development as outlined in statutory duties, national policy, and evidential standards. It mirrors the central issues that led to the 2008 rejection of the Lewis Wind Power proposal, which found the level of industrialisation unacceptable. This new application is presented within a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and the wellbeing of communities.

There are significant gaps in the evidential basis necessary for proper determination of the application. The use of an undefined design envelope, reliance on unspecified mitigation measures, and the absence of crucial impact pathways, including those related to nocturnal wildlife, full onshore infrastructure, and tourism, have resulted in an incomplete Environmental Impact Assessment. This inadequacy hinders a comprehensive understanding of the likely significant effects or residual impacts.

Procedural shortcomings are also evident, notably the lack of a compliant Island Communities Impact Assessment, which breaches statutory obligations under the Islands (Scotland) Act 2018. The failure to provide a complete Social Impact Assessment represents a serious omission that prevents the competent authority from evaluating the effects on community wellbeing, cultural identity, and economic resilience. These deficiencies render the application unfit for determination.

The proposal is at odds with the National Planning Framework 4, failing to prove the protection of biodiversity, natural spaces, and cultural heritage. It does not demonstrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to missing tourism impact modelling. The cumulative effects of offshore and onshore components have not been adequately assessed, obscuring their implications for peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal are uncertain and potentially significant. Evaluations of marine ecology, seabirds, protected species, and marine mammals remain incomplete and inconsistent in places. The evidence presented does not meet the threshold required to eliminate adverse effects beyond reasonable scientific doubt, thus engaging the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

Overall, the application is both procedurally and substantively unfit for determination. The combination of information deficiencies, policy conflicts, and unresolved environmental risks obstructs a lawful and evidence-based decision. It is imperative that the competent authority either refuse consent on these grounds or invoke the appropriate regulatory measures to request the submission of the missing information.

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

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: EEED4F6F

Member of the public 1199

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

Dear Sir/Madam

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally lacking, failing to deliver a comprehensive, transparent, or dependable overview of the potential environmental impacts of the proposal. The adoption of a flexible Project Design Envelope, which lacks commitments to specific dimensions, layouts, or configurations of the turbines, introduces considerable uncertainty. This situation hampers the ability

to apply a worst-case scenario consistently and jeopardises the integrity of the assessment, meaning that the impacts outlined may not correspond to the development that will ultimately be constructed. As a result, both the public and the competent authority are unable to fully comprehend the true extent of the environmental effects.

Furthermore, the application leans significantly on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent on the premise that environmental harm will be addressed later denies any meaningful evaluation of the effectiveness of these measures or an accurate assessment of residual impacts. This postponement of critical information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which mandates that likely significant effects and mitigation must be clearly identified prior to determination.

The report also presents notable evidential shortcomings, characterised by gaps in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. Such deficiencies engender uncertainty about the scale and significance of impacts, particularly where conclusions indicating 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 and introduces scientific uncertainty that fails to meet statutory requirements.

Consequently, the application does not satisfy the evidential standards set under the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it cannot be established that impacts have been thoroughly evaluated or that suitable safeguards are in place.

Overall, the reliance on an ambiguous design envelope, the absence of specified mitigation measures, and the gaps in baseline data lead to an Environmental Impact Assessment Report that is unreliable and incomplete. These shortcomings inhibit a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make an informed decision based on the information presented.

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents a flawed ornithological assessment characterised by significant gaps in evidence and internal contradictions that undermine its conclusions. Located within key foraging areas and migratory pathways, the development's impact on the internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already in decline, is inadequately demonstrated. There is no robust evaluation of the potential implications of displacement, collision risk, or habitat loss associated with this project.

A troubling contradiction arises as the developer claims no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment, suggesting that the conclusions drawn are unsupported by the available evidence.

Furthermore, the assessment does not sufficiently demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these critical feeding grounds is not fully considered, and the reliance on modelling approaches introduces additional uncertainty, especially for species in severe decline, including Kittiwakes and Fulmars. The methodologies employed may underestimate mortality, particularly where baseline data is incomplete and behavioural responses are poorly understood.

The proposed siting of turbines within a recognised migratory corridor introduces further risk, creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The application fails to adequately assess the long-term implications of sustained mortality within this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application does not 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 data deficiencies and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This invokes the precautionary principle and renders a lawful conclusion in support of consent impossible.

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 show that internationally important seabird populations will not be adversely affected places the proposal directly at odds with national policy.

Collectively, these issues render the assessment unreliable due to its internal inconsistencies, methodological flaws, and insufficient evidence. These shortcomings hinder a robust evaluation of impacts and culminate in the overall conclusion that the application does not meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The application inadequately addresses the assessment of cultural heritage and community identity, neglecting to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. It adopts a simplistic view, treating heritage merely as isolated, static assets and failing to acknowledge their ongoing social, cultural, and spiritual significance within the community.

Particularly concerning is the treatment of important cultural sites such as the

cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places for burial and spiritual practices; however, they are categorised in the assessment as static features, overlooking their continued use and meaning, as well as the potential impact of development on their surroundings. This misrepresentation leads to an incomplete evaluation of cultural effects and neglects their vital role in community life.

Moreover, the assessment falls short by not considering intangible cultural heritage, which includes the Gaelic language, traditions, and the community's longstanding relationship with the coastal environment. These elements are crucial to the area's identity and are entirely omitted from the assessment, marking a significant lapse. Without addressing these aspects, the cultural implications of the development cannot be accurately understood.

There are additional issues related to community rights and engagement. The Gaelic-speaking population has a distinct cultural identity characteristic of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent undertaken. This lack of meaningful engagement diminishes the validity of the assessment and fails to comply with established principles regarding participation in decisions that affect cultural and environmental matters.

A notable procedural failure is the lack of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. This omission means that the competent authority cannot meet its legal obligation to assess the social, cultural, and economic impacts on the island community, preventing a lawful determination.

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

Overall, the absence of a thorough 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 fails to provide a sufficient basis for determining the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

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

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

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

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

The procedural implications of this situation are considerable. The competent authority is unable to conduct a robust socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a significant omission within the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

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

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 evaluation of fisheries and marine life within the application is notably inadequate, lacking a thorough assessment of ecological and socio-economic repercussions. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing industry, yet the proposal fails to illustrate how these vital habitats and uses will be preserved or sustained without incurring significant disruption.

A major concern is the erroneous assumption that fishing activities can be relocated without repercussions. The application does not provide any evidence that alternative fishing grounds exist, are accessible, or can accommodate additional pressure. This significant gap raises the risk of overfishing in other areas and could have far-reaching economic impacts on the local fishing fleet. In the absence of a clear, evidence-based evaluation, the effects on fisheries and community livelihoods remain obscured.

Furthermore, the project poses considerable risks to marine species, particularly due to the underwater noise associated with construction activities. The extended use of high-energy hammer piling is anticipated to cause disturbance over considerable distances, impacting marine life such as dolphins. The projected disturbance to a considerable portion of the local bottlenose dolphin population is alarming, yet the application minimises these concerns without adequate supporting data.

There is a troubling inconsistency in the application regarding the recognition of the need for licences to permit harm to European Protected Species, while simultaneously categorising the impacts as negligible. This contradiction calls into question the credibility of the assessment and raises significant issues concerning adherence to the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

Moreover, the assessment neglects to account for cumulative impacts that arise from various pressures, including habitat disturbance, noise, and fishing displacement. Without a thorough examination of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate alignment with the National Planning Framework 4 or the National Marine Plan. It does not adequately show that the proposed development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, thereby obstructing any conclusion that the project constitutes sustainable development.

In summary, the deficiencies stemming from the lack of evidence on fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies render the assessment incomplete and untrustworthy. These shortcomings significantly impede a comprehensive evaluation of impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

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

Furthermore, by omitting or postponing the evaluation of onshore impacts, the

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

There are also considerable risks posed to sensitive habitats, including machair systems and peatland environments, which are subject to protective policies. The application does not substantiate that impacts on these habitats have been fully assessed or that suitable avoidance measures have been implemented, leading to an evidential gap regarding biodiversity protection.

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

The routing of infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. The application does not present evidence that the requisite consents or processes have been commenced, raising questions about deliverability and lawful implementation.

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

Collectively, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts render this section of the application incomplete and unreliable, ultimately hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

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

Significantly, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experience of both residents and visitors. The omission is particularly concerning given the vital role dark skies play in the area's identity. Furthermore, the lack of consideration for nocturnal wildlife is alarming. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel

are known to be sensitive to artificial lighting, which can lead to disorientation and an increased risk of collision. Without a lighting impact assessment or phototaxis study, the application does not address how aviation lighting might affect these species or contribute to increased mortality rates.

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

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

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

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

TOURISM

The Isle of Lewis has seen tourism grow considerably, with its economic value increasing from £65 million in 2017 to over £81.5 million, creating more than 1,000 jobs and representing up to 16% of the island's economy. However, the application fails to model how large-scale offshore infrastructure could impact this vital sector. It acknowledges that 86% of visitors are attracted by the natural scenery, yet does not provide a quantified assessment of how such industrialisation might affect visitor numbers, behaviour, or the overall economic contribution of tourism.

In addition, the assessment overlooks the essential role that environmental quality plays in supporting tourism. The significance of the area's unspoiled landscapes and dark skies is critical to the visitor experience, especially in emerging markets like nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this oversight, resulting in a notable gap in understanding how the proposed development might affect these aspects of the local economy.

Given the limited economic diversification within the island community, the lack of a comprehensive assessment of tourism impacts carries wider implications for local employment, businesses, and the sustainability of the community. The absence of a

compliant Island Communities Impact Assessment means these economic vulnerabilities have not been thoroughly evaluated, as required by the Islands (Scotland) Act 2018. Furthermore, 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 fails to align with strategic objectives that prioritise tourism as a growth sector and does not provide adequate evidence for the competent authority to assess the economic consequences of the proposal.

Collectively, the failure to quantify tourism impacts, evaluate the environmental factors influencing visitor behaviour, and recognise the island's economic reliance leads to a significant evidential gap. This hampers a robust evaluation of the economic effects, ultimately suggesting 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 as mandated by statutory duties, national policy, and evidential standards. This proposal echoes the core issues that resulted in the 2008 refusal of the Lewis Wind Power proposal, where the level of industrialisation was deemed unacceptable. It is now being presented under a policy framework that places heightened importance on biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant deficiencies in the evidential basis for this proposal. Critical gaps exist in baseline data, and the application relies on an undefined design envelope with unspecified mitigation measures. Key impact pathways have been omitted, including those affecting nocturnal wildlife, the full scope of onshore infrastructure, and tourism implications. Consequently, the Environmental Impact Assessment remains incomplete, hindering a comprehensive understanding of the likely significant effects and residual impacts.

Moreover, the application demonstrates clear procedural failures. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations outlined in the Islands (Scotland) Act 2018. Additionally, the failure to fully disclose the Social Impact Assessment represents a material omission that prevents the competent authority from adequately assessing impacts on community wellbeing, cultural identity, and economic resilience, thus rendering the application unfit for determination.

In terms of compliance with National Planning Framework 4, the proposal is in direct conflict. It does not adequately demonstrate the protection of biodiversity, natural environments, and cultural heritage. Furthermore, it fails to show that health and wellbeing impacts are acceptable and lacks evidence of net economic benefits, particularly due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been properly evaluated, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertainty persists regarding the environmental risks associated with this proposal. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in certain areas. The evidential threshold required to conclusively exclude adverse effects beyond reasonable scientific doubt has not been met, invoking the precautionary principle and preventing any lawful conclusion that the impacts are acceptable.

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

In summary, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, policy conflicts, and unresolved environmental risks preclude a lawful and evidence-based decision. Therefore, it is imperative that the competent authority refuses consent for this application or invokes the appropriate regulatory measures to secure the submission of the required missing information.

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

Yours faithfully,

[Redacted]

Member of the public 1200

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the proposed Spiorad na Mara Offshore Wind Farm. The application has been submitted under the applicable marine licensing and Environmental Impact Assessment regimes. This objection arises from an examination of the Environmental Impact Assessment Report and its associated documents, which reveal significant deficiencies in planning, environmental assessment, cultural considerations, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns have been raised regarding the scale, proximity, and design of the proposal, which challenge its alignment with statutory requirements, national policy, and sustainable development principles.

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

There exist substantive conflicts with established policies. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health and wellbeing. It does not demonstrate compliance with national requirements aimed at safeguarding biodiversity, climate considerations, and environmental integrity. Such conflicts directly affect the statutory tests required for consent, thereby compromising the competent authority's ability to conclude that the development adheres to policy standards.

The scale of the proposed development is unprecedented for this area, with large turbines positioned in close proximity to the shoreline, raising substantial concerns regarding landscape capacity, visual dominance, and environmental ramifications. Collectively, the lack of adequate information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance indicate that the application is incomplete and incapable of sustaining a lawful determination. In light of these circumstances, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and fails to provide a transparent and reliable account of the environmental effects associated with the proposal. 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 hinders the consistent application of a worst-case scenario, undermining the integrity of the assessment. As a result, the impacts described may not accurately reflect the actual development that is ultimately constructed, leading to a failure to inform the public and the competent authority about the true extent of environmental effects.

The application places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Consent is being requested on the basis that potential environmental harm will be addressed later, which impedes a meaningful evaluation of effectiveness and the assessment of residual impacts. This deferment of essential information to post-consent stages is procedurally unacceptable, contradicting the purpose of the Environmental Impact Assessment regime that mandates the clear establishment of likely significant effects and mitigation prior to determination.

Moreover, the assessment presents significant evidential deficiencies, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, particularly where conclusions of negligible or non-significant effects are made without robust supporting data. The lack of sufficient information hampers a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that is incompatible with statutory requirements.

Consequently, the application does not satisfy the evidential threshold mandated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation necessitates the application of the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate compliance with National Planning Framework 4, which includes essential requirements for biodiversity protection and environmental integrity, as it cannot be established that impacts have been fully assessed or that appropriate safeguards are implemented.

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

ASSESSMENT OF ALTERNATIVES

The application lacks a thorough assessment of alternatives, which is a critical component of the Environmental Impact Assessment regime. Instead of offering a reasoned and structured comparison of realistic alternatives based on their environmental effects, the submission provides a narrative of project evolution. This method does not adequately prove that less harmful options have been effectively identified, evaluated, and prioritised over more damaging choices.

Moreover, the application does not present a transparent or evidence-based comparison of potential offshore locations, development scales, or design configurations. Specifically, it fails to show that the developer has genuinely considered placing turbines further offshore, where the impacts on visual aesthetics, ecology, and coastal integrity would likely be diminished. The significance of the West Lewis coastline and the critical nature of proximity to the shore in assessing impact means that this lack of analysis hinders any assertion that the proposed location is the least damaging.

These shortcomings also apply to the routing of cables and the assessment of landfall sites, where there is inadequate evidence that alternative routes have been thoroughly investigated to avoid or lessen impacts on sensitive areas. This encompasses regions of cultural and spiritual significance, such as Barvas Cemetery. The absence of a clear strategy for avoidance and the lack of comparative analysis suggest that the principle of mitigation by design has not been implemented, with an over-reliance on post-design mitigation strategies.

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

From a policy standpoint, this inadequacy undermines adherence to National Planning Framework 4, particularly concerning the protection of natural environments, cultural heritage, and community wellbeing. The absence of a systematic and comparative assessment is a significant shortfall that contributes to the overall conclusion that the application has not undergone sufficient evaluation and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment provided concerning marine ecology and protected species is lacking in crucial areas and fails to offer a thorough and trustworthy understanding of ecological receptors in the West Lewis coastal environment. This region is recognised as a sensitive and biologically rich marine system. However, the absence of comprehensive baseline data and the methodologies employed do not adequately capture the presence, behaviour, and habitat use of species. Consequently, the

assessment lacks a solid evidential basis for evaluating potential impacts.

One significant gap pertains to otters, classified as a European Protected Species. The application does not appropriately acknowledge or assess their active foraging and movement in coastal areas. This oversight regarding their core foraging range and behavioural patterns leads to an inadequate evaluation of the potential effects of construction-related disturbances, noise, and increased activity. Such shortcomings undermine any conclusions drawn about the absence of significant effects on this species.

Further shortcomings are evident in the evaluation of basking sharks, where the reliance on aerial surveys introduces a considerable detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence, especially when compared with established land-based observations that indicate frequent utilisation of these waters. The failure to integrate or adequately consider such data results in an incomplete baseline, further compromising the reliability of the conclusions reached.

These methodological flaws mean that assertions of negligible or non-significant effects are primarily grounded in assumptions rather than substantiated 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 situation creates uncertainty surrounding the true scale of risks posed 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 it has not properly identified or assessed protected species. The level of uncertainty involved hinders the ability to exclude adverse effects beyond reasonable scientific doubt, thus activating the precautionary principle. Under these conditions, it is unlawful to grant consent.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development on the west coast of the Isle of Lewis is critically flawed, exhibiting substantial gaps in evidence and internal contradictions that undermine its findings. This area is home to internationally significant seabird populations, many of which are already in decline. However, the application fails to adequately demonstrate that these species will not be negatively impacted. The development is situated within key foraging areas and migratory routes, yet the assessment does not thoroughly consider the risks of displacement, collision, or

habitat loss.

A major inconsistency arises within the application, as the developer claims there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is typically necessary only when significant harm is anticipated. This contradiction raises serious doubts about the credibility of the assessment and suggests that its conclusions lack support from the underlying evidence.

Furthermore, the assessment does not sufficiently establish that seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. The critical importance of these feeding grounds is insufficiently addressed, and reliance on modelling approaches introduces uncertainty, particularly concerning species like Kittiwakes and Fulmars that are in severe decline. The methodologies used are likely to underestimate mortality rates, particularly due to incomplete baseline data and an inadequate understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor poses an additional and significant risk by effectively obstructing a primary flight path for species migrating between the United Kingdom and Iceland. The application lacks a thorough assessment of the long-term consequences of sustained mortality in this corridor and its potential impacts on species with relatively small global populations.

Regulatory scrutiny reveals that the application does not satisfy the evidential requirements necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory findings, along with gaps in data and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This situation invokes the precautionary principle, thereby obstructing a lawful conclusion in favour of consent.

Overall, the identified deficiencies reflect a failure to adhere to National Planning Framework 4 concerning biodiversity protection and the preservation of natural assets. The inability to prove that internationally important seabird populations will not face adverse effects places the proposal in direct opposition to national policy. Collectively, these factors render the assessment unreliable, characterised by internal inconsistencies, methodological flaws, and a lack of sufficient evidence. Such shortcomings inhibit a thorough evaluation of impacts and lead to the conclusion that the application fails to meet the statutory requirements needed for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development has not adequately assessed the cultural heritage and community identity associated with the West Lewis coastline. This area is a living cultural landscape, where environment, language, tradition, and community are interconnected. The application employs a reductive perspective, treating heritage as isolated, static assets, neglecting their ongoing social, cultural, and spiritual relevance within the community.

A significant flaw in the assessment concerns culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active places of burial and spiritual practice. However, the assessment erroneously categorises them as static features, overlooking their continued use and the implications of development on their surroundings. This mischaracterisation leads to an incomplete evaluation of cultural effects and fails to acknowledge their importance within community life.

Additionally, the application neglects to evaluate intangible cultural heritage, which includes the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These aspects are vital to the area's identity, yet they are entirely omitted from the assessment, representing a significant oversight. Without addressing these elements, a thorough understanding of the cultural impact of the development is unachievable.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population possesses a distinct cultural identity that aligns with recognised characteristics of an Indigenous People. Nevertheless, the process of Free, Prior and Informed Consent has not been conducted. This lack of meaningful engagement undermines the legitimacy of the assessment and fails to adhere to established principles of participation in decisions affecting cultural and environmental interests.

Moreover, a critical procedural error is the absence of a compliant Island Communities Impact Assessment, a statutory requirement established by the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to fulfill its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone hinders a lawful determination.

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

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

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

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

There are also significant methodological issues regarding the selection and depiction of visual viewpoints. Evidence indicates that these viewpoints may not accurately capture the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises concerns that the true magnitude of visual impact has been minimised, calling into question the reliability of the assessment.

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

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline is known for its clean coastal waters and important habitats, which are particularly vulnerable to contamination and sediment disturbance. The

proposal includes significant seabed preparation and installation activities within a high-energy Atlantic environment; however, the assessment of construction and pollution risks is incomplete and lacks the necessary detail to evaluate the likely environmental effects. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans in place. Instead, the application depends on mitigation and contingency measures that are to be prepared after consent, hindering any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures raises significant concerns given the sensitivity of the surrounding environment. While the application does acknowledge risks such as sediment mobilisation and potential chemical or oil spills, it fails to provide enough detail on how these risks will be prevented, controlled, or monitored. Additionally, there is uncertainty surrounding the scale and behaviour of sediment plumes that may arise from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also extends to potential consequences for marine species and habitats that have already been identified as sensitive.

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

From a regulatory standpoint, deferring critical environmental safeguards is at odds with the requirements set forth by the Environmental Impact Assessment regime. Likely significant effects and necessary mitigation must be evaluated prior to consent, and the absence of such information prevents a lawful determination. The application also does not adequately demonstrate compliance with the 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 render the assessment materially deficient. These shortcomings obstruct a thorough evaluation of construction and pollution risks, further supporting the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

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

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

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

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

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

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

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

In summary, the absence of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions throughout the application culminate in an incomplete and unreliable assessment. These shortcomings impede a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed project encompasses both offshore turbines and onshore works; however, the assessment of the onshore infrastructure is incomplete, failing to account for the full range of impacts associated with this single integrated initiative. The offshore and onshore components are inherently connected, yet they are evaluated separately, which leads to a fragmented understanding of the environmental and socio-economic ramifications.

Among the onshore elements are the installation of cabling across protected moorland, the construction of a substation near Stornoway, and the necessary access infrastructure that traverses sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which is recognized as a significant carbon store and an ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, thereby inhibiting a comprehensive understanding of the project's overall environmental footprint.

The approach of excluding or delaying the evaluation of onshore impacts obstructs a proper assessment of cumulative effects. The Environmental Impact Assessment process mandates that all aspects of a project be considered collectively, yet the disaggregation of offshore and onshore components obscures the combined impacts on peatlands, habitats, and local communities.

Moreover, there are considerable risks to sensitive habitats, including machair systems and peatland environments, which are protected under policy guidelines. The application fails to demonstrate that the impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been established. This presents a clear evidential gap regarding biodiversity protection.

The proposal also raises issues concerning carbon balance, as the disturbance of peatland can release stored carbon, potentially resulting in a carbon debt that contradicts the goals of renewable energy development. The application does not adequately address this concern or prove that the overall carbon balance remains advantageous.

Additionally, routing infrastructure through active croft land poses possible conflicts with existing land use and legal rights. The application provides no evidence that the required consents or processes have been initiated, thus raising concerns about the feasibility and legal validity of implementation.

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

In summary, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence concerning environmental and land use impacts contribute to the conclusion that this section of the application is incomplete and unreliable, which obstructs a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife is a significant oversight within the Environmental Impact Assessment. The West Lewis

coastline is renowned for its exceptionally dark skies, which are vital for the area's environmental quality, cultural identity, and tourism value. The introduction of permanent red aviation lighting, visible over considerable distances, would create a persistent and disruptive "wall of light" effect across the western horizon, drastically changing the night-time environment.

The application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This lack of consideration is especially troubling given the significance of dark skies to the area's identity and the emerging sectors of tourism, such as astro-tourism. The omission represents a clear gap in the overall assessment of landscape and environmental impacts.

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

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

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

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm signifies a significant failure to meet the standards of sustainable development as required by statutory duties, national policy, and evidential criteria. This application echoes the principal issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Presenting this application under a

stronger policy framework, which emphasises the importance of biodiversity, peatland conservation, landscape integrity, and community welfare, does not mitigate these concerns.

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

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

The proposal is also at odds with National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural environments, and cultural heritage, fails to establish that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit due to insufficient tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been properly evaluated, obscuring the implications for peatlands, carbon balance, habitats, and crofting land.

There remains uncertainty around environmental risks, which may be significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and contain inconsistencies. The evidential threshold required to discount adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

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

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

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

Additional Comments

Simply too big a 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: DB0A1CBE

Member of the public 1201

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

Dear Sir/Madam

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

A crucial issue lies in the inadequacy of the evidential basis provided for a lawful determination. Essential environmental data is absent, and the baseline information presented is limited and inconsistent. Moreover, critical aspects of the proposal remain undefined. The flexible design framework utilised obscures the understanding of potentially significant effects, and the reliance on unspecified mitigation measures renders their effectiveness impossible to evaluate. Consequently, the documentation does not facilitate a complete or informed understanding of the potential environmental, cultural, or community impacts. Assertions regarding negligible or non-significant effects lack robust supporting evidence.

Furthermore, there are substantial policy conflicts evident within the proposal. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate that national requirements for the protection of biodiversity, climate interests, and environmental integrity can be satisfied. Such conflicts directly challenge the statutory tests required for consent and compromise the competent authority's capacity to deem the development acceptable in policy terms.

The unprecedented scale of the proposal raises significant concerns regarding landscape capacity, visual dominance, and environmental impact, especially with the positioning of large turbines in close proximity to the shoreline. The combination of inadequate information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance illustrates that the application is incomplete and incapable of supporting a lawful determination. In light of these issues, the precautionary principle must be applied.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the cultural heritage and community identity associated with the proposed development is fundamentally flawed, failing to recognise the West Lewis coastline as a dynamic cultural landscape where the environment, language, tradition, and community are interconnected. This application adopts a reductive perspective, viewing heritage merely as a collection of isolated, static assets and neglecting their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming of the assessment is its treatment of culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for burial and spiritual practices, yet they are categorised as static features in the assessment. This oversight neglects their continued significance and the potential impacts of development on their surroundings, leading to an incomplete evaluation of the cultural effects and disregarding their importance in community life.

Moreover, the assessment overlooks intangible cultural heritage, particularly the Gaelic language, traditions, and the long-standing relationship between the community and the coastal environment. These elements are vital to the area's identity but are entirely absent from the evaluation, representing a considerable omission. The failure to consider such factors hinders a comprehensive understanding of the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population possesses a distinct cultural identity recognised as characteristic of an Indigenous People, yet there has been no process for Free, Prior and Informed Consent. This lack of meaningful engagement diminishes the legitimacy of the assessment and fails to adhere to established principles of participation in decisions affecting cultural and environmental interests.

Furthermore, a critical procedural failure is the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The absence of this assessment means that the competent authority is unable to fulfil its legal duty to evaluate the social, cultural, and economic impacts on the island community. This alone obstructs a lawful determination of the proposal.

From a policy standpoint, the noted deficiencies place the proposal in direct opposition to National Planning Framework 4, particularly concerning the protection of historic assets and locations. The failure to account for both tangible and intangible heritage, as well as to recognise living cultural practices, constitutes a clear deviation from policy requirements.

In summation, the combined failures to assess living heritage, intangible cultural value, community rights, and statutory obligations result in a significant evidential gap. The cultural impacts of the proposed development have not been adequately evaluated, and the application does not furnish a sufficient foundation for understanding the true cultural costs associated with the proposal.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development when evaluated against statutory duties, national policy, and evidential standards. This application brings forth the same core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was evident. Although the current application is presented under a more robust policy framework, it places increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

A reliable and comprehensive evidential basis for determination is notably lacking in the application. Critical gaps exist in the baseline data, the design envelope remains undefined, and there is an over-reliance on unspecified mitigation measures. Key impact pathways are omitted, including those affecting nocturnal wildlife, the complete onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a full understanding of significant effects or residual impacts.

Procedural inadequacies are also present. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations set out in the Islands (Scotland) Act 2018. Furthermore, the failure to disclose a complete Social Impact Assessment constitutes a material omission. These gaps obstruct the competent authority from assessing the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

This proposal stands in direct opposition to 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 and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative impacts of offshore and onshore components have not been properly assessed, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. The assessments related to marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also exhibit internal inconsistencies. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been satisfied, thus invoking the precautionary principle and 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, disruptions to cultural and visual relationships, and negative impacts on tourism represent enduring effects that cannot be mitigated to an acceptable degree.

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

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

Additional Comments

Local community's voices have not been listened to. These are the people that will be irreparably affected in the event that this construction goes ahead. Not only them, but the generations that will succeed them. Don't sell off local land to exploitative multinational industries.

Yours faithfully,

[Redacted]

Member of the public 1202

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

Dear Sir/Madam

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

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

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

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

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 consequences of the proposal. The application's reliance on a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This uncertainty obstructs the application of a worst-case scenario analysis, thereby undermining the integrity of the assessment. As a result, the impacts outlined may not accurately represent the development that is ultimately realised, leaving both the public and the competent authority unable to grasp the true extent of the environmental effects.

Consent is being requested based on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. This approach precludes any meaningful evaluation of effectiveness or assessment of residual impacts, as it defers critical information to post-consent stages. Such a deferral is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which mandates that likely significant effects and their mitigations are clearly established before any determination.

Moreover, there are substantial evidential deficiencies, including inadequate baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. These gaps generate uncertainty regarding the magnitude and significance of impacts, especially where claims of negligible or non-significant effects are made without sufficient supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, resulting in scientific uncertainty that cannot align with statutory obligations.

Consequently, the application does not satisfy the evidential threshold required under the Habitats Regulations, failing to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, as it cannot be 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 specified mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report untrustworthy and incomplete. These shortcomings inhibit a lawful and robust assessment of environmental effects, thereby 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 significantly lacking and does not fulfill the legal requirements set out by the Environmental Impact Assessment regime. It fails to offer a structured and reasoned comparison of viable alternatives based on their environmental effects. Instead, it provides a narrative detailing the

project's development history. This method does not prove that less harmful options have been adequately identified, evaluated, and chosen over more detrimental solutions.

There is a notable absence of a transparent and evidence-based analysis of alternative offshore locations, development scales, or design configurations. Specifically, the application does not show that the developer has genuinely considered placing the turbines further offshore, which would likely mitigate visual, ecological, and coastal impacts. Considering the sensitivity of the West Lewis coastline, as well as the critical role of proximity to the shore in assessing impact, the lack of such evaluation hinders any assertion that the proposed siting is the least damaging option.

These inadequacies also affect the assessment of cable routing and landfall. There is insufficient evidence that alternative routes have been thoroughly investigated to avoid or lessen impacts on sensitive receptors, including areas of cultural and spiritual significance like Barvas Cemetery. The absence of a clear strategy to avoid impacts and the lack of comparative analysis suggest that mitigation through design has not been adequately implemented, leading to a reliance on post-design mitigation measures.

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

From a policy standpoint, this shortcoming calls into question compliance with National Planning Framework 4, particularly regarding the protection of natural environments, cultural heritage, and community wellbeing. The failure to present a structured and comparative assessment is a significant omission that adds to the conclusion that the application has not undergone adequate scrutiny and cannot be lawfully determined.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment provided concerning marine ecology and protected species is lacking in crucial areas and fails to offer a thorough and trustworthy understanding of ecological receptors in the West Lewis coastal environment. This region is recognised as a sensitive and biologically rich marine system. However, the absence of comprehensive baseline data and the methodologies employed do not adequately capture the presence, behaviour, and habitat use of species. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

One significant gap pertains to otters, classified as a European Protected Species. The application does not appropriately acknowledge or assess their active foraging and movement in coastal areas. This oversight regarding their core foraging range and

behavioural patterns leads to an inadequate evaluation of the potential effects of construction-related disturbances, noise, and increased activity. Such shortcomings undermine any conclusions drawn about the absence of significant effects on this species.

Further shortcomings are evident in the evaluation of basking sharks, where the reliance on aerial surveys introduces a considerable detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence, especially when compared with established land-based observations that indicate frequent utilisation of these waters. The failure to integrate or adequately consider such data results in an incomplete baseline, further compromising the reliability of the conclusions reached.

These methodological flaws mean that assertions of negligible or non-significant effects are primarily grounded in assumptions rather than substantiated 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 situation creates uncertainty surrounding the true scale of risks posed 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 it has not properly identified or assessed protected species. The level of uncertainty involved hinders the ability to exclude adverse effects beyond reasonable scientific doubt, thus activating the precautionary principle. Under these conditions, it is unlawful to grant consent.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The cultural heritage and community identity assessment is fundamentally insufficient, overlooking the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are interwoven. The application reduces heritage to isolated, static assets, disregarding their ongoing social, cultural, and spiritual significance within the community.

Culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas, are misrepresented in the assessment. These locations serve as active sites of burial and spiritual practice, yet they are classified as static features. This mischaracterisation neglects their current use and meaning, as well as the impact of development on their setting, leading to an incomplete evaluation of cultural effects and dismissing their importance within community life.

Moreover, the assessment fails to consider intangible cultural heritage, such as the Gaelic language, traditions, and the established relationship between the community and the coastal environment. These aspects are integral to the area's identity but have been entirely omitted from the assessment, creating a significant gap. Without addressing these factors, the true cultural impact of the development remains poorly understood.

Concerns extend to community rights and engagement. The Gaelic-speaking population holds a unique cultural identity with characteristics of an Indigenous People; however, no process of Free, Prior and Informed Consent has taken place. This lack of meaningful engagement questions the legitimacy of the assessment and neglects established principles regarding participation in decisions that affect cultural and environmental interests.

A serious procedural flaw is 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 adequately fulfil its legal obligation to evaluate the social, cultural, and economic ramifications for the island community. This omission alone renders any lawful determination impossible.

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

In summary, the lack of assessment concerning living heritage, intangible cultural value, community rights, and statutory obligations leads to a substantial evidential gap. The cultural consequences of the development have not been adequately examined, and the application does not establish a sufficient foundation for evaluating the genuine cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's failure to publish the complete Social Impact Assessment fundamentally undermines the assessment of social impacts, health, and wellbeing. This lack of transparency represents 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 own research. Despite the commissioning of this assessment and focus groups with local residents, the absence of the full report limits scrutiny of its findings and hinders the determination of their relevance in the decision-making process.

Evidence suggests that local residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts arise from direct engagement rather than speculation; however, without access to the complete assessment, the seriousness of these effects cannot be

appropriately considered. Furthermore, the proposal is viewed as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Yet, these significant impacts have not been adequately integrated into the main application or given the necessary weight.

The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development, which is particularly concerning given the scale of the project. Such a lack of transparency compromises the Environmental Impact Assessment process, as a comprehensive understanding of social, economic, and health impacts is vital when assessing developments that may alter community character and functionality. The failure to provide the full dataset results in an application that does not present a complete evidential basis for evaluating the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Development must facilitate positive health outcomes and mitigate harm; however, the evidence available indicates adverse effects that remain undisclosed. Without the full assessment, the application cannot claim compliance with this policy.

Moreover, the procedural ramifications are substantial. The competent authority is unable to perform a thorough socio-economic and health evaluation without the complete Social Impact Assessment, marking a material omission within the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime. The combination of non-disclosure of the full Social Impact Assessment and evidence of existing adverse impacts leads to an incomplete and unreliable assessment, obstructing a lawful determination and reinforcing the conclusion that the application is not backed by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development raises significant concerns regarding its impact on the landscape, seascape, and cultural heritage of the West Lewis area. The assessment provided does not sufficiently address the scale of the proposed changes or the sensitivity of the surrounding environment. The coastline is characterised by an open Atlantic horizon and an undeveloped, remote atmosphere. The installation of large-scale turbines near the shoreline would introduce a pervasive industrial element that fundamentally transforms the landscape in a permanent and irreversible manner.

Moreover, the magnitude of the visual change has not been adequately represented within the application. Given the size and proximity of the turbines, they would dominate views from residential areas and historic sites, as well as from popular coastal locations. This situation would significantly undermine visual amenity and diminish the area's essential qualities of naturalness and remoteness. The assessment fails to convey the true level of this impact, particularly within such a sensitive landscape.

Methodological issues have also been identified concerning the choice and presentation of visual viewpoints. Evidence indicates that the selected viewpoints may not effectively represent the most sensitive receptors or the worst-case scenarios, especially regarding key cultural heritage sites and valued landscapes. This oversight raises concerns that the extent of visual impact has been understated, compromising the credibility of the assessment.

Additionally, the application overlooks the vital connections between landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments exist within a larger landscape context that is visually and spatially linked to the Atlantic horizon. Rather than acknowledging these interdependencies, the assessment treats these assets as isolated, leading to an incomplete understanding of the impacts on their context and cultural significance.

The industrialisation of the seascape would sever these critical relationships, altering how heritage assets are perceived and disrupting their connection to the natural horizon. This transformation represents not only a visual issue but also a broader cultural and spatial harm that has not been thoroughly evaluated in the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4, which aims to protect natural environments and historic assets. The scale of the proposed changes is at odds with the need to preserve landscape character, visual amenity, and the settings of culturally significant locations. The lack of a comprehensive worst-case assessment further undermines the argument for compliance with established policy.

It is evident that the identified impacts are unlikely to be effectively mitigated. Due to the scale, height, and proximity of the turbines, their presence would be overwhelmingly dominant and unavoidable. Consequently, the resulting changes would be fundamental and permanent, rather than amenable to reduction through mitigation measures.

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

CONSTRUCTION AND POLLUTION RISKS

The application is materially deficient due to the absence of defined mitigation measures and the lack of detailed management plans. There is an incomplete assessment of construction and pollution risks, which does not provide the necessary detail to evaluate likely environmental effects. The proposal includes substantial seabed preparation and installation works within a high-energy Atlantic environment; however, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on undefined mitigation and contingency measures that will only be prepared post-consent, which inhibits any meaningful

assessment of their adequacy or effectiveness.

This reliance on future measures raises significant concerns, particularly because of the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats, which are vulnerable to disturbances from sediment and potential contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it does not adequately detail how these risks will be prevented, controlled, or monitored.

Uncertainty also exists regarding the scale and behaviour of sediment plumes that will arise from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it remains impossible to determine the extent, duration, or ecological effects of these impacts. This uncertainty extends to potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment.

Further complicating these issues is the absence of detailed emergency response procedures. By deferring contingency planning to a post-consent stage, the application prevents any evaluation of whether appropriate safeguards are in place to respond to pollution events. This not only introduces procedural risk but also undermines the capacity of the competent authority to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of critical environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation are assessed before consent is granted. When such information is lacking, a lawful determination cannot be made. Additionally, the application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the combination of these shortcomings—lack of detailed management plans, the absence of defined mitigation measures, and uncertainty regarding potential impacts—renders the assessment inadequate. This prevents a thorough evaluation of construction and pollution risks and supports the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment of the proposed development raises significant concerns regarding its impact on both fisheries and marine life. The waters off the West Lewis coast are not only home to a diverse marine ecosystem but also support an active fishing industry. However, the application does not convincingly demonstrate how these vital uses and habitats can be safeguarded from substantial disruption.

A critical flaw within the application is the unsubstantiated assumption that fishing activities can simply be relocated without adverse consequences. There is no evidence provided to suggest that alternative fishing grounds are available or capable of

accommodating the additional pressures that displacement would create. This oversight is particularly troubling, as it could lead to overfishing in other areas and have broader economic ramifications for the local fishing fleet. The absence of a clear, evidence-based assessment leaves the impacts on fisheries and local livelihoods poorly understood.

Additionally, the proposal poses considerable risks to marine species, especially due to the underwater noise generated by construction activities. The anticipated high-energy hammer piling over an extended period is expected to cause widespread disturbance, which may affect species such as dolphins. Alarmingly, the potential disruption to a significant portion of the local bottlenose dolphin population is downplayed in the application, lacking adequate supporting evidence.

There exists a noteworthy inconsistency within the application, acknowledging the need for licenses to permit harm to European Protected Species while simultaneously claiming that the impacts are negligible. This contradiction calls into question the credibility of the assessment and raises alarms about compliance with the Habitats Regulations, particularly in situations where anticipated harm necessitates legal authorisation.

Moreover, the cumulative impacts resulting from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities, have not been adequately considered. Without a thorough evaluation of these combined effects, it is impossible to ascertain the overall implications for marine ecosystems and socio-economic conditions.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is incomplete and does not fully consider the impacts of what is a single integrated project. The offshore turbines and onshore works are inherently connected but are evaluated separately. This separation leads to a fragmented approach, obscuring the overall environmental and socio-economic effects.

Onshore components consist of cabling through protected moorland, the construction of a substation near Stornoway, and the necessary access infrastructure across

sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which is an important carbon store and ecologically delicate habitat. The application fails to deliver a thorough assessment of these impacts, hindering a complete understanding of the project's environmental footprint.

By excluding or postponing the assessment of onshore impacts, the application prevents a proper evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all parts of a project must be considered together. However, the division between offshore and onshore elements results in a lack of understanding of the combined impacts on peatlands, habitats, and communities.

There are significant risks to sensitive habitats, including machair systems and peatland environments, which enjoy policy protection. The application does not adequately demonstrate that the impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures are in place. This creates an evident gap in biodiversity protection.

The proposal also raises issues regarding carbon balance. Disturbing peatland releases stored carbon, potentially leading to a carbon debt that contradicts the goals of renewable energy development. The application does not sufficiently address this matter or show that the overall carbon balance is beneficial.

Additionally, routing the 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, casting doubt on its deliverability and legal compliance.

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

Overall, the separation of project components, lack of a comprehensive assessment, and absence of evidence regarding environmental and land use impacts result in this portion of the application being incomplete and unreliable, thereby obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

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

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

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

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

Without a proper evaluation of nocturnal effects, it becomes impossible to ascertain whether protected species or designated sites may be adversely impacted. The evidential standard necessary to rule out adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, these omissions conflict with the National Planning Framework 4 regarding the protection of natural places and environmental quality. They also weaken the overall assessment of landscape and seascape impacts, as the night-time character is an essential component of the environment.

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

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.

Additional Comments

Have you visited the Isle of Lewis and Harris? Have you stood on a shoreline and gazed afar to the horizon? So far into the distance that it seems as though that all that stands dissolves and all that could arise shimmers in unknown vastness. Vastness of imagination. Vastness of potential. Vastness of a future that belongs not just to the human existence but to the earth itself, and all who have temporary residency. Have you stood on a shoreline and taken in the silence that holds whispers of life and existence that stood before our species did? Have you ever gazed into a rock pool and discovered the wonderment of life and a planet that exists within our planet? Have you placed your feet in the sand and allowed the senses of the shoreland sound and take you to a place of serenity? If you have..when was the last time?

Consider the right you think you have to steal from the purity of landscape. Money and paper exchanged as though the seabed belongs as property to any human. How can it belong to a species that was not here before it? We are so concerned as a species about our carbon footprints that we are attempting to reduce our impact on the environment; yet the blind boots that do not look disturb what lays beneath them. The carnage we have been shown of the seabed. The impact on sea-life below and birds above we have been shown.

There must be communication. The communities that are coming together in many parts are voicing their feelings, thoughts and concerns not for their own aesthetic needs. They see what is not being seen by those who are literally smoking the land away. The visual impact of those standing cigarettes in the sea with smoke bellowing out mirrors the impact of the turbines. Lungs of life filling up with unseen disease. Creating power but at a cost that is higher.

Profit speaks louder than prophets, yet the consequence will speak louder when the planet continues to be thrust into misalignment. The economy is given higher value over ecology, yet the monetary economy and environmental ecosystem will not sustain due to the disharmony the destruction of natural wildlife will create.

It is imperative you talk to communities and listen. Take time to discover the land. You see yourself the changes in your own lifetime how the world is now. It is easy to build more but the true value is seeing the beauty in what we can preserve and further nourish it to flourish my making healthy decisions for the wellbeing of the planet and wildlife. Take time to learn about the world you live in. Mainland seems to consume and these wild untouched spaces are rare.

When was the last time you walked along the shoreline and saw an untouched horizon. One that dissolved your mind and senses and took your imagination beyond all that you know?

Yours faithfully,

[Redacted]

all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: C9CF9176

Member of the public 1203

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 inadequacy of the assessment of alternatives is significant and does not fulfil the statutory requirements of the Environmental Impact Assessment regime. Rather than offering a structured and reasoned comparison of feasible alternatives based on environmental effects, the application presents a narrative that details the evolution of the project. This method fails to illustrate that less harmful options have been thoroughly identified, evaluated, and chosen over more damaging solutions.

There is an absence of transparent, evidence-based comparisons of alternative offshore locations, development scales, or design configurations. Notably, the application does not indicate that the developer has genuinely considered placing turbines further offshore, where the visual, ecological, and coastal impacts are likely to be less severe. Given the sensitivity of the West Lewis coastline and the critical role of proximity to shore in determining impact, the lack of such an analysis means that one cannot conclude that the proposed siting is the least damaging option.

These deficiencies also extend to the assessment of cable routing and landfall, with insufficient evidence that alternative routes have been adequately explored to avoid or minimise effects on sensitive receptors, including areas of cultural and spiritual significance like Barvas Cemetery. The failure to present a clear avoidance strategy and the absence of comparative analysis suggest that mitigation by design has not been implemented, relying instead on post-design mitigation measures.

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

Summaries that are available show that residents are experiencing notable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts

come from direct engagement and are not based on speculation. The lack of disclosure of the full assessment obstructs proper scrutiny of the findings and diminishes the capacity to assess their significance in the decision-making process.

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

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is incomplete and does not adequately address the full extent of impacts from what constitutes a single integrated project. The offshore turbines and the associated onshore works are interrelated; however, they are evaluated separately, leading to a fragmented analysis that fails to reflect the true scale of 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 infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and is an ecologically delicate habitat. The current application lacks a

thorough assessment of these impacts, which prevents a complete understanding of the project's overall environmental footprint.

The exclusion or postponement of onshore impact assessments hinders the proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively; however, the separation of offshore and onshore elements obscures the combined impacts on peatlands, habitats, and local communities.

Moreover, there are considerable risks to sensitive habitats such as 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 appropriate avoidance measures have been put in place, resulting in a notable evidential gap concerning biodiversity protection.

Concerns also arise regarding the project's carbon balance. Disturbing peatland releases stored carbon, which could lead to a carbon debt that contradicts the principles of renewable energy development. The application fails to sufficiently address this concern or to demonstrate that the overall carbon balance remains advantageous.

Additionally, routing infrastructure through active croft land presents potential conflicts with existing land use and legal rights. The application does not provide evidence that necessary consents or processes have been initiated, thereby raising questions about the project's deliverability and legal compliance.

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed, failing to meet the criteria for sustainable development as outlined in statutory obligations, national policy, and evidential standards. It revisits the core concerns that resulted in the rejection of the Lewis Wind Power application in 2008, specifically regarding the unacceptable scale of industrialisation. This current application is presented within a more robust policy context that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant deficiencies in the evidential basis provided for the determination of this application. It lacks comprehensive baseline data and relies on an undefined design envelope, alongside unspecified mitigation measures. Moreover, it overlooks critical impact pathways, such as those affecting nocturnal wildlife, the complete onshore infrastructure, and potential tourism impacts. As a result, the Environmental Impact Assessment remains incomplete, failing to offer a thorough understanding of likely significant effects or residual impacts.

Procedurally, there are evident failures as well. The lack of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty in accordance with the Islands (Scotland) Act 2018. Additionally, the failure to provide a complete Social Impact Assessment represents a significant 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.

The proposal is in direct opposition to the National Planning Framework 4, lacking the demonstration of biodiversity protection, safeguarding of natural places and cultural heritage, and acceptable health and wellbeing impacts. It fails to provide evidence of a net economic benefit, particularly due to the absence of tourism impact modelling. Furthermore, it has not adequately assessed the cumulative effects of both offshore and onshore elements, thus obscuring their impacts 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 both incomplete and, at times, inconsistent. The necessary evidential threshold required to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

The proposal would also bring about substantial and irreversible changes to a highly sensitive landscape. The anticipated industrialisation of the Atlantic-facing coastline, loss of dark skies, disruption of cultural and visual relationships, and impacts on tourism constitute permanent effects that cannot be satisfactorily 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, obstruct a lawful, evidence-based decision. The competent authority must therefore either refuse consent based on these grounds or utilise the relevant regulatory provisions to necessitate the submission of the missing information.

It is thus formally requested that the application for the Spiorad na Mara Offshore Wind Farm is entirely 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: FF295449

Member of the public 1204

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection is informed by a thorough review of the Environmental Impact Assessment Report and its supporting documents, revealing significant planning, environmental, cultural, and procedural deficiencies.

The development's location off the west side of the Isle of Lewis is characterised by its Atlantic-facing coastline, a near-pristine environment, and a strong cultural identity. Concerns arise regarding the scale, proximity, and design of the proposed development, which call into question its compatibility with statutory requirements, national policy, and the principles of sustainable development.

The application lacks an adequate evidential basis for a lawful determination. There is a notable absence of critical environmental data, while baseline information is both limited and inconsistent. Many key aspects of the proposal remain undefined. The use of a flexible design framework obscures the understanding of likely significant effects, and the reliance on unspecified mitigation measures leaves their effectiveness unassessable. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by robust evidence.

Furthermore, the proposal exhibits clear and substantive conflicts with existing policy. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially regarding biodiversity, natural places, cultural heritage, and health and wellbeing. There is insufficient demonstration that it meets national requirements to safeguard biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests required for consent, undermining the competent authority's ability to deem the development acceptable under policy considerations.

The unprecedented scale of the proposal, with large turbines situated in close proximity to the shoreline, introduces significant concerns about landscape capacity, visual dominance, and environmental impact. The combination of inadequate information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle is warranted.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The proposal for the development is underpinned by an Environmental Impact Assessment Report that is fundamentally flawed, failing to deliver a full, transparent, or reliable account of the potential environmental impacts. The introduction of a flexible Project Design Envelope, which lacks defined turbine dimensions, layouts, or configurations, leads to considerable uncertainty. This ambiguity hampers the ability to apply a consistent worst-case scenario, thereby compromising the integrity of the assessment and obscuring the true environmental effects. Consequently, both the public and the competent authority are left without a clear understanding of the possible impacts from the development ultimately constructed.

Furthermore, the application heavily depends on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent on the basis that environmental harm will be mitigated later undermines the potential for a meaningful evaluation of effectiveness and leaves residual impacts unassessed. This deferment of essential information to post-consent phases is procedurally improper and contradicts the Environmental Impact Assessment framework, which mandates that significant effects and mitigation measures must be clearly established prior to any determination.

There are substantial evidential shortcomings within the assessment, including gaps in baseline data and methodological limitations. The reliance on assumptions rather than site-specific evidence leads to uncertainty regarding the extent and significance of impacts. This is particularly concerning when conclusions regarding negligible or non-significant effects are made without adequate supporting data. The lack of comprehensive information inhibits a thorough understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that fails to meet statutory requirements.

As a result, the application does not satisfy the evidential standards outlined in the Habitats Regulations necessary to rule out adverse effects beyond reasonable scientific doubt. This situation activates the precautionary principle, especially in relation to protected species and sensitive habitats. Moreover, the proposal does not demonstrate compliance with National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it remains unproven that impacts have been thoroughly assessed or that adequate safeguards are in place.

Collectively, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the existing gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings obstruct a lawful and rigorous 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 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.

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 evaluation of cultural heritage and community identity is deeply flawed, neglecting to recognise the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community intertwine. The application reduces heritage to isolated, static elements, failing to acknowledge their dynamic social, cultural, and spiritual roles within the community.

Significant shortcomings arise in the treatment of culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active burial sites and places of spiritual significance, yet they are characterised merely as static features, overlooking their ongoing use, importance, and the implications of development on their surroundings. This mischaracterisation leads to an incomplete understanding of cultural effects, disregarding their vital role in community life.

The application also neglects to account for intangible cultural heritage, such as the Gaelic language and traditions, as well as the enduring bond between the community and the coastal environment. These aspects are essential to the area's identity but are entirely omitted from the assessment, creating a substantial gap in understanding the cultural impact of the development.

Concerns also arise regarding community rights and involvement. The Gaelic-speaking population maintains a unique cultural identity akin to that of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the legitimacy of the assessment and fails to adhere to established principles of participation in decisions that affect cultural and environmental interests.

A major procedural shortcoming is the absence of a compliant Island Communities Impact Assessment, a legal requirement under the Islands (Scotland) Act 2018. Without this assessment, the responsible authority cannot fulfil its legal obligation to evaluate the social, cultural, and economic effects on the island community. This omission alone renders a lawful determination impossible.

From a policy standpoint, these shortcomings place the proposal at odds with the National Planning Framework 4, especially regarding the protection of historical assets and places. The failure to consider both tangible and intangible heritage, alongside the neglect of living cultural practices, marks a clear deviation from policy expectations.

When considered collectively, the disregard for living heritage, intangible cultural value, community rights, and statutory duties results in a significant evidential void. The cultural impacts of the development remain inadequately assessed, and the application fails to provide a sound basis for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the full report remains unpublished. This absence of disclosure creates a significant evidential gap, hindering both public understanding and the competent authority's ability to assess the social risks identified in the developer's own research.

Available summaries highlight that residents are already experiencing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement with the community and are not speculative. Yet, without the complete assessment, proper scrutiny of these findings is impossible, limiting the capacity to evaluate their significance in the decision-making process.

Furthermore, there is indication that the proposal is viewed as a direct threat to

community identity and cohesion, with references to "cultural loss" noted within the developer's findings. Despite this recognition, these impacts have not been adequately incorporated into the main application or given the necessary consideration. The lack of access to the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

This deficiency in transparency undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially where community character and functioning may be jeopardised. The failure to provide the complete dataset means the application lacks a comprehensive evidential basis for weighing the benefits against potential harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Developments are expected to promote positive health outcomes and avoid adverse impacts; however, the existing evidence reveals harmful effects that remain undisclosed. Without the full assessment, it cannot be established that the application aligns with this policy.

The procedural implications of these omissions are considerable. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a critical shortfall in the application and signifies a failure to meet the evidential requirements of the Environmental Impact Assessment framework.

Overall, the non-disclosure of the complete Social Impact Assessment, combined with evidence of current adverse impacts, results in an incomplete and unreliable assessment. This situation obstructs a lawful determination and reinforces the conclusion that the application is not sufficiently substantiated.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal involves the introduction of large-scale turbines close to the West Lewis coastline, which is characterised by its open Atlantic horizon and undeveloped character. This development would create a dominant industrial presence that would fundamentally alter the area's existing character, resulting in a permanent transformation of the landscape that cannot be mitigated.

The assessment of seascape, landscape, and visual impacts is significantly deficient, failing to adequately convey the scale of visual change anticipated. Given the size and proximity of the turbines, they would dominate views from residential areas, historic sites, and coastal locations frequently used by the public. This alteration would directly impact visual amenity and diminish the natural qualities that define the area. Furthermore, the assessment does not reflect the significance of these impacts in relation to the sensitive landscape.

Methodological issues are also apparent in the selection and presentation of visual

viewpoints. Evidence indicates that the chosen viewpoints may not accurately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This situation raises the possibility that the assessment has underestimated the magnitude of visual impact, thereby compromising its reliability.

Additionally, the assessment neglects to evaluate the interconnected relationship between the landscape, seascape, and cultural heritage. Important 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. The current assessment treats these sites as isolated entities, failing to acknowledge their interdependence and thereby resulting in an incomplete evaluation of the impacts on their 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 change represents not only a visual impact but also a broader cultural and spatial harm that has not been adequately assessed within the proposal.

From a policy standpoint, the proposed development conflicts with National Planning Framework 4, particularly regarding the protection of natural places and historic assets. The scale of change presented is incompatible with the necessary safeguarding of landscape character, visual amenity, and the setting of culturally significant sites. Moreover, the lack of a comprehensive worst-case assessment weakens any assertions of compliance with policy guidelines.

The impacts identified are clearly not capable of effective mitigation. Due to the height, scale, and proximity of the turbines, their presence would be unavoidable and dominant. Thus, the resulting change to the landscape is not merely significant; it is fundamental and permanent.

In conclusion, the assessment fails to accurately represent the scale of impact, the environmental sensitivity, and the interrelated nature of landscape and heritage. These deficiencies inhibit a reliable evaluation and affirm that the proposal is not compatible with the protection of this landscape.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is insufficient and fails to encompass the full range of impacts from a project that should be considered as a cohesive whole. The offshore turbines and the onshore works are inherently connected, yet their evaluation occurs separately, leading to a disjointed analysis that masks the true extent of environmental and socio-economic consequences.

Onshore components include cabling across protected moorland, the construction of a substation near Stornoway, and related access infrastructure that traverses sensitive landscapes. These activities necessitate excavation in areas of deep peat, particularly

within Barvas Moor, a crucial carbon store and ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, obstructing a comprehensive understanding of the project's environmental footprint.

By failing to address the onshore impacts adequately, the application hinders a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project elements are assessed collectively; however, the disjunction between offshore and onshore evaluations leaves the combined repercussions on peatlands, habitats, and local communities inadequately explored.

There are notable risks to sensitive habitats, such as machair systems and peatland environments, which receive policy protection. The application does not sufficiently show that impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, resulting in a significant evidential gap concerning biodiversity protection.

Furthermore, the routing of infrastructure through active croft land raises potential conflicts with established land use and legal rights. The application fails to provide evidence that the requisite consents or processes have been initiated, bringing into question the deliverability and legal compliance of the project.

From a policy viewpoint, the lack of a comprehensive assessment of the project as a unified entity, alongside insufficient demonstration of protection for peatlands, habitats, and land use interests, is in direct conflict with the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be 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 part of the application incomplete and unreliable, preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The omission of assessments regarding dark skies and nocturnal wildlife represents a significant gap in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are crucial for the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting that can be seen over long distances would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

The proposal fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This is particularly concerning given the vital role that dark skies play in the area's identity and the growth of emerging tourism sectors such as astro-tourism. The lack of consideration for these impacts creates a clear gap in the overall landscape and environmental assessment.

Moreover, there is no analysis of the impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to phototaxis, which can lead to disorientation and increased collision risks. The application lacks a lighting impact assessment or a phototaxis study, failing to address how aviation lighting may affect these species or contribute to increased mortality rates.

This issue is exacerbated by the reliance on daytime survey data for the ornithological assessment, which does not adequately capture nocturnal activity or related risks. Other species, such as Kittiwakes, that may forage or migrate at night are also at risk of disorientation from artificial lighting, yet this has not been evaluated. The absence of site-specific night-time data hinders the understanding of ecological impacts.

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

From a policy standpoint, these omissions contradict the National Planning Framework 4 regarding the protection of natural spaces and environmental quality. They also weaken the broader assessment of landscape and seascape impacts since the character of night-time forms an essential element of the environment.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the standards of sustainable development as required by statutory duties, national policy, and evidential standards. This application echoes the core concerns that led to the refusal of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the scale of industrialisation. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application does not adequately address these critical areas.

A significant concern is the incomplete and unreliable evidential basis for determination. There are notable gaps in baseline data and an undefined design envelope is employed, alongside unspecified reliance on mitigation measures. Key impact pathways, including nocturnal wildlife, onshore infrastructure, and tourism effects, have been omitted from the assessment. Consequently, the Environmental Impact Assessment is insufficient, hindering a comprehensive understanding of the likely significant effects and residual impacts.

Procedural failures are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory duties under the Islands (Scotland) Act 2018, while the failure to disclose a full Social Impact Assessment is a material omission. These gaps impede the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

Moreover, the proposal conflicts directly with National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural places, and cultural heritage. The health and wellbeing impacts have not been shown to be acceptable, and the absence of tourism impact modelling prevents evidence of any net economic benefit. Additionally, the cumulative impacts of both offshore and onshore components have not been properly assessed, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

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

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

Overall, the application is procedurally and substantively unfit for determination. The scale of deficiencies in information, combined with policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority is urged to refuse consent on these grounds or to invoke regulatory provisions requiring the submission of the missing information.

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

Yours faithfully,

[Redacted]

Member of the public 1205

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 objection stems from an analysis of the Environmental Impact Assessment Report and associated documents, which reveal significant deficiencies in planning, environmental considerations, cultural respect, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. Concerns arise regarding the scale, proximity, and design of the project, specifically questioning its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks an adequate evidential foundation for a lawful determination. There are notable gaps in critical environmental data, and the baseline information provided is both limited and inconsistent. Additionally, several key aspects of the proposal remain undefined. The reliance on a flexible design framework hinders a clear understanding of the likely significant effects, while the unspecified mitigation measures make it impossible to assess their effectiveness. Consequently, the documentation fails to deliver a comprehensive understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects are not supported by adequate evidence.

Furthermore, there are pronounced policy conflicts associated with the proposal. 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. The application does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly affect the statutory tests needed for consent and compromise the competent authority's ability to ascertain that the development is acceptable from a policy standpoint.

The unprecedented scale of the proposal in this area raises serious concerns about landscape capacity, visual dominance, and environmental impact, given the large turbines planned to be positioned close to the shoreline. The cumulative effect of insufficient information, reliance on undefined mitigation, evidential deficiencies, and clear non-compliance with policy illustrates that the application is incomplete and cannot facilitate a lawful determination. Under these circumstances, it is essential that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents a materially deficient analysis, failing to deliver a comprehensive, transparent, or reliable overview of the likely environmental effects associated with the proposal. A key issue lies in the employment of a flexible Project Design Envelope, which lacks commitment to defined turbine dimensions, layouts, or configurations. This introduces considerable uncertainty and obstructs a consistent application of a worst-case scenario. Consequently, the integrity of the assessment is compromised, leading to a situation where the impacts reported may not accurately reflect the actual development that will be constructed. This gap in information hinders both public understanding and the competent authority's ability to gauge the true extent of environmental effects.

Furthermore, the application places significant reliance on yet-to-be-defined mitigation measures, monitoring strategies, and management plans. Seeking consent under the premise that potential environmental harm will be addressed subsequently obstructs any meaningful evaluation of effectiveness and the assessment of residual impacts. This deferral of critical information to post-consent stages is procedurally unacceptable and contradicts the intent of the Environmental Impact Assessment regime, which mandates that likely significant effects and their mitigation be clearly outlined prior to determination.

There exist substantial evidential deficiencies as well, characterised by gaps in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. Such shortcomings create uncertainty regarding the magnitude and significance of the impacts, especially where negligible or non-significant effects are asserted without robust supporting data. The lack of adequate information precludes a clear understanding of cumulative and worst-case impacts and introduces a level of scientific uncertainty that fails to meet statutory requirements.

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. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, particularly in relation to biodiversity protection and environmental integrity, as it remains unproven that impacts have been thoroughly assessed or that suitable safeguards are established.

In summary, the combination of an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data culminate in an Environmental Impact Assessment Report that is both unreliable and incomplete. Such deficiencies obstruct a lawful and thorough assessment of environmental effects, leaving the competent authority ill-equipped to determine the application based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally flawed and fails to provide a reliable understanding of the ecological receptors in the West Lewis

coastal environment. This marine system is not only highly sensitive but also biologically active. Despite this, the baseline data is incomplete and the methodologies employed do not effectively capture species presence, behaviour, and habitat use, ultimately leading to an unreliable foundation for evaluating impacts.

A critical issue pertains to otters, classified as a European Protected Species. The application does not adequately acknowledge or assess their active use of coastal regions for foraging and movement. This oversight regarding their core foraging range and behavioural patterns means that potential effects stemming from construction disturbance, noise, and increased activity have not been thoroughly evaluated. Such deficiencies undermine any conclusions about the absence of significant effects on otters.

Additionally, the assessment of basking sharks is similarly compromised. The reliance on aerial surveys introduces a significant bias in detection, particularly under Atlantic conditions. This methodology is likely to underestimate the presence of basking sharks when compared to established land-based observations that show frequent use of these waters. The omission of relevant data in this regard leads to an incomplete baseline and diminishes the reliability of the conclusions reached.

These methodological shortcomings imply that any conclusions drawn about negligible or non-significant effects are based more on assumptions than on sound evidence. The lack of adequate baseline data inhibits a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises concerns about the actual scale of risks posed to marine species and their habitats.

From a regulatory standpoint, the application does not fulfil the requirements set by the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainties introduced by these deficiencies prevent the exclusion of adverse effects beyond reasonable scientific doubt, necessitating the application of the precautionary principle. Under these circumstances, granting consent is not legally permissible.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage along the West Lewis coastline is fundamentally flawed, failing to recognise it as a living cultural landscape where the environment, language, tradition, and community are interwoven. The application adopts a narrow perspective that reduces heritage to isolated and static assets, neglecting their ongoing social, cultural, and spiritual significance within the community.

Particularly concerning is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet the assessment categorises them merely as static features. This oversight disregards their continued use, meaning, and the impact that development could have on their setting. As a result, the evaluation of cultural effects is incomplete and ignores their vital role in community life.

Moreover, the assessment neglects intangible cultural heritage, including the Gaelic language, traditions, and the deep-rooted relationship between the community and the coastal environment. These elements are crucial to the area's identity, yet they are entirely overlooked, resulting in a significant gap in understanding the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, possessing a distinct cultural identity akin to that of an Indigenous People, has not been engaged through a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the legitimacy of the assessment and fails to adhere to established principles of participation in decisions that impact cultural and environmental interests.

Another critical failure is the omission 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 obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders a lawful determination impossible.

These deficiencies place the proposal in direct conflict with the National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to address both tangible and intangible heritage, alongside the disregard for living cultural practices, marks a clear deviation from policy requirements.

Overall, the lack of assessment regarding living heritage, intangible cultural values, community rights, and adherence to statutory obligations creates a substantial evidential gap. The cultural impacts of the development have not been adequately evaluated, leaving the application insufficient to assess the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal raises significant concerns regarding social impacts, health, and wellbeing, primarily due to the material deficiency in the assessment and the lack of transparency surrounding it. Although a Social Impact Assessment was commissioned by the developer, which included focus groups with local residents, the absence of the full report creates a substantial evidential gap. This gap restricts both public scrutiny and the competent authority's ability to fully grasp the social risks that have been identified through the developer’s own research.

Available summaries highlight that residents are currently enduring measurable stress, anxiety, and concern as a direct result of the scale and proximity of the proposed development. These effects stem from direct engagement with the community, making them grounded in reality rather than speculation. However, without access to the complete assessment, the significance of these findings cannot be accurately determined within the decision-making process.

Moreover, there are indications that the proposal is viewed as a threat to community identity and cohesion, with “cultural loss” specifically noted in the developer’s findings. Unfortunately, these impacts have not been adequately integrated into the main application, nor have they been accorded the necessary weight in the evaluation process. The failure to disclose the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

This lack of transparency further undermines the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health ramifications is vital for developments of this nature, especially where the character and functioning of the community may be at risk. The omission of the complete dataset hampers the application’s ability to present a comprehensive evidential basis for weighing the benefits against the harm.

From a policy standpoint, the application falls short in demonstrating adherence to the National Planning Framework 4 concerning health and wellbeing. Developments must encourage positive health outcomes and avoid causing harm, yet the evidence that is currently available indicates existing adverse effects that have not been fully revealed. Therefore, it is impossible to ascertain compliance with this policy without the full assessment.

The procedural implications of this situation are significant. The competent authority is unable to conduct a thorough socio-economic and health evaluation in the absence of the full Social Impact Assessment. This represents a material omission within the application and a clear failure to meet the evidential standards required by the Environmental Impact Assessment regime.

In summary, the failure to disclose the complete Social Impact Assessment, when combined with the evidence of existing adverse impacts, renders the assessment not only incomplete but also unreliable. This lack of sufficient information ultimately obstructs a lawful determination regarding the application.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon and a strong sense of remoteness, aspects that are integral to its undeveloped nature. The introduction of large-scale turbines near the shoreline threatens to impose a continuous industrial presence, which would fundamentally alter this unique character. This change would result in a permanent and irreversible transformation of the landscape, overshadowing the natural beauty that defines the area.

Concerns regarding the assessment of visual impacts are significant. The application fails to accurately represent the magnitude of change that would occur. The sheer scale and close proximity of the turbines mean that they would dominate views from residential areas and historic sites, as well as from popular coastal locations. Such dominance would erode the visual amenity and diminish the defining qualities of naturalness and remoteness within this sensitive landscape, yet this level of impact is not adequately conveyed in the assessment.

Methodological issues also arise concerning the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints do not sufficiently capture the most sensitive receptors or worst-case scenarios, particularly related to key cultural heritage sites and high-value landscapes. This raises concerns that the visual impact may have been understated, which undermines the credibility of the assessment.

Moreover, there is a failure to evaluate the interconnected relationships between landscape, seascape, and cultural heritage. Significant sites like the Calanais Standing Stones and other Scheduled Monuments are interlinked with the wider landscape, sharing visual and spatial connections to the Atlantic horizon. However, the assessment treats these sites as isolated entities, neglecting their interdependence, which results in an incomplete understanding of how the proposal would impact their setting and cultural significance.

The industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are experienced and severing their ties to the natural horizon. This is not merely a visual issue; it represents a broader cultural and spatial harm that has not been thoroughly assessed within the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, particularly concerning the protection of natural places and historic assets. The scale of proposed changes contradicts the need to safeguard landscape character, visual amenity, and the settings of culturally significant sites. Additionally, the lack of a robust worst-case assessment further weakens any argument for policy compliance.

It is clear that the identified impacts cannot be effectively mitigated. The dominance of the turbines due to their scale, height, and proximity means that their presence would be unavoidable. Consequently, the change would be fundamental and permanent, not something that could be reduced to an acceptable level through mitigation measures.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the standards of sustainable development as defined by statutory duties, national policy, and evidential criteria. The application echoes the fundamental issues that resulted in the 2008 rejection of the Lewis Wind Power proposal, where the unacceptable scale of industrialisation was highlighted. This current proposal is put forth under a policy framework that supposedly emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it still does not satisfy these requirements.

There are substantial shortcomings in the evidential basis for determining the application. Critical gaps exist in baseline data, with an undefined design envelope and unspecified mitigation measures. Furthermore, key impact pathways such as nocturnal wildlife, the full scope of onshore infrastructure, and effects on tourism have been omitted. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a clear understanding of potential significant effects and residual impacts.

Additionally, procedural issues are evident. The lack of a compliant Island Communities Impact Assessment breaches the statutory duties established under the Islands (Scotland) Act 2018. Furthermore, the failure to present a full Social Impact Assessment constitutes a material omission, hindering the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

The proposal contradicts National Planning Framework 4, as it does not adequately protect biodiversity, natural places, or cultural heritage. It also fails to demonstrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. Moreover, the cumulative impact of offshore and onshore components has not been adequately assessed, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and exhibit inconsistencies. The evidential threshold required to demonstrate the absence of adverse effects beyond reasonable scientific doubt has not been achieved, necessitating the application of the precautionary principle, which prevents a lawful conclusion that impacts are acceptable.

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

In summary, the application is both procedurally and substantively unfit for determination. The significant information deficiencies, paired with policy conflicts and unresolved environmental risks, obstruct a lawful and evidence-based decision. It is

imperative that the competent authority either refuses consent based on these grounds or invokes the appropriate regulatory provisions to mandate the submission of the missing information.

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

Yours faithfully,

[Redacted]

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: 54A83988

Member of the public 1206

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

Dear Sir/Madam

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

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

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

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

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 lack of transparency surrounding the assessment of social impacts, health, and wellbeing is alarming and poses significant concerns for the evaluation process. The developer commissioned a Social Impact Assessment that included focus groups with local residents, yet the full report remains unpublished. This gap in available information hinders both the public and the competent authority from fully grasping the social risks identified through the developer's own research.

Residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal, and these impacts are based on direct engagement rather than speculation. However, without the complete assessment, there is no opportunity for proper scrutiny of the findings, which limits the ability to evaluate their significance within the decision-making process.

Moreover, the proposal is perceived as a threat to community identity and cohesion, with the developer's findings acknowledging the potential for "cultural loss." Despite this recognition, these impacts have not been adequately considered in the main application. The failure to disclose the full Social Impact Assessment conceals the true human and social costs associated with the development.

This lack of transparency seriously undermines the Environmental Impact Assessment process. Understanding the social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning may be jeopardised. By withholding the full dataset, the application does not provide a robust evidential basis for weighing benefits against potential harm.

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

The procedural implications of these deficiencies are significant. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment, marking a substantial omission within the application and failing to meet the evidential standards required by the Environmental Impact Assessment regime.

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

CONSTRUCTION AND POLLUTION RISKS

The proposed development involves significant seabed preparation and installation works in a high-energy Atlantic environment, yet the assessment of construction and pollution risks lacks the necessary detail to evaluate potential environmental effects.

The application does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans, instead relying on future mitigation and contingency measures that are intended to be established post-consent. This approach raises concerns as it hinders any meaningful assessment of the adequacy or effectiveness of these undefined measures.

Given the sensitivity of the receiving environment, which includes the West Lewis coastline with its clean coastal waters and important habitats vulnerable to sediment disturbance and contamination, this reliance on future planning is particularly troubling. The application acknowledges risks such as sediment mobilisation and the possibility of accidental chemical or oil spills but fails to provide adequate information on how these risks will be prevented, controlled, or monitored.

There is also a lack of clarity regarding the scale and behaviour of sediment plumes resulting from the disturbance of the seabed and cable installation. Without thorough modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. Furthermore, this uncertainty extends to potential effects on marine species and habitats identified as sensitive in the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning to a stage after consent has been granted, the application obstructs the evaluation of whether appropriate safeguards are in place to address pollution events. This introduces procedural risks and diminishes the capacity of the competent authority to assess environmental protection measures at the time of decision-making.

From a regulatory standpoint, deferring crucial environmental safeguards contradicts the requirements set out by the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be evaluated prior to granting consent, and without this information, a lawful determination cannot be achieved. Additionally, the application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

In conclusion, the deficiencies in defined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts result in a materially incomplete assessment. These shortcomings hinder a thorough evaluation of construction and pollution risks, reinforcing the argument that the application is insufficient.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The offshore turbines and onshore works are part of a single integrated project, yet the current assessment of onshore infrastructure is materially incomplete. By treating these elements separately, a fragmented approach emerges that obscures the full scale of environmental and socio-economic impacts. This deficiency prevents a clear understanding of the project's overall environmental footprint.

The onshore components involve cabling through protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure across sensitive landscapes. Excavation in areas of deep peat, particularly within Barvas Moor, poses significant risks, as this region serves as a crucial carbon store and ecologically sensitive habitat. The failure to provide a comprehensive assessment of these impacts raises substantial concerns.

Moreover, excluding or deferring the assessment of onshore impacts hampers the proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively, yet the separation of offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities are inadequately understood.

There are also significant risks to habitats such as machair systems and peatland environments, which are protected by policy. The application falls short of demonstrating that impacts on these sensitive areas have been fully assessed or that appropriate avoidance measures are in place, resulting in a clear evidential gap concerning biodiversity protection.

Additionally, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application does not present evidence that the necessary consents or processes have been initiated, casting doubt on the deliverability and lawful implementation of the project.

From a policy standpoint, the failure to evaluate the project in its entirety and to demonstrate protection for peatlands, habitats, and land use interests stands in conflict with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be mitigated further undermines the application.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development as outlined 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 have serious concerns regarding the proposed Spiorad na Mara Wind Farm development on the Isle of Lewis and strongly object to the scale and potential impact of the project on our community, heritage, and environment.

I am concerned about the wider social impacts of the proposal. Large construction projects can place significant pressure on housing, public services, roads, and community cohesion in small rural areas. The introduction of a substantial temporary workforce into a traditionally low-crime and close-knit community creates uncertainty around policing, antisocial behaviour, and the capacity of local infrastructure to cope with sudden population changes.

There are further concerns regarding health and wellbeing, including stress, noise, traffic disruption, and the long-term visual impact on residents. Construction activity also brings risks of pollution, peatland disturbance, water contamination, and habitat damage. These combined impacts could cause lasting harm to both the environment and the wellbeing of local communities

Yours faithfully,

[Redacted]

Member of the public 1207

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 is submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The development's location off the west side of the Isle of Lewis is significant, as the area is characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise regarding the compatibility of this proposal with statutory requirements, national policy, and sustainable development principles due to its scale, proximity, and design.

A review of the Environmental Impact Assessment Report reveals that the application lacks an adequate evidential basis for a lawful determination. Missing critical environmental data, limited and inconsistent baseline information, and undefined key aspects of the proposal hinder a comprehensive understanding of the likely significant effects. The use of a flexible design framework complicates this further, as the reliance on unspecified mitigation measures raises questions about their effectiveness. Consequently, the documentation fails to facilitate a full or informed understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects are not substantiated by robust evidence.

There are clear policy conflicts evident within the proposal, as it appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. These conflicts particularly relate to biodiversity, natural places, cultural heritage, and health and wellbeing, failing to demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such inconsistencies directly affect the statutory tests required for consent, compromising the ability of the competent authority to assess the development's acceptability in policy terms.

The unprecedented scale of the proposal, with large turbines positioned near the shoreline, raises significant concerns regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and evident policy non-compliance indicates that the application is incomplete and incapable of supporting a lawful determination. In light of these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary thoroughness and transparency, failing to present a reliable overview of the anticipated environmental effects associated with the proposal. The introduction of a flexible Project Design

Envelope, which does not commit to specific dimensions, layouts, or configurations for the turbines, creates significant uncertainty. This uncertainty impedes the consistent application of a worst-case scenario analysis, thereby compromising the assessment's integrity. As a result, the potential impacts may not accurately represent what will ultimately be constructed, hindering both public understanding and the competent authority's ability to grasp the full extent of environmental consequences.

Furthermore, the application is heavily dependent on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Consent is being sought under the premise that any environmental harm will be mitigated in the future, obstructing a thorough evaluation of these measures' effectiveness or an assessment of any residual impacts. This postponement of critical information to post-consent phases is procedurally unacceptable, as it contradicts the fundamental purpose of the Environmental Impact Assessment regime, which necessitates that likely significant effects and mitigation strategies be clearly articulated prior to determination.

Moreover, there are substantial evidential shortcomings present, including gaps in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. This results in ambiguity concerning the scale and significance of impacts, especially where negligible or non-significant effects are asserted 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 mandated by the Habitats Regulations, which requires the exclusion of adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly regarding protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, failing to satisfy requirements relating to biodiversity protection and environmental integrity, as it cannot confirm that impacts have been comprehensively assessed or that appropriate safeguards are implemented.

Overall, the combination of reliance on an unspecified design envelope, lack of defined mitigation measures, and the gaps present in baseline data contribute to the Environmental Impact Assessment Report being both unreliable and incomplete. These deficiencies obstruct a lawful and robust assessment of environmental effects, leaving the competent authority unable to make an informed determination based on the information provided.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed and lacks the rigorous evidence needed to support its conclusions. It overlooks the critical fact that the west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already declining. The application fails to provide

adequate assurance that these species will not be adversely affected, particularly given that the development is situated within vital foraging areas and migratory pathways. The assessment does not thoroughly consider the risks of displacement, collision, or habitat loss that may arise from the project.

Moreover, there is a glaring contradiction in the application, as the developer asserts that no significant adverse effects will occur while also presenting a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency undermines the credibility of the assessment and raises doubts about the validity of its findings. The evidence presented does not convincingly demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The critical feeding grounds for these birds are not adequately evaluated, and the reliance on modelling raises significant uncertainty, particularly for species like Kittiwakes and Fulmars that are in severe decline. The methodologies used are likely to underestimate mortality rates, especially where baseline data is lacking and the behavioural responses of the species are not fully understood.

The placement of turbines within a recognised migratory corridor presents an additional risk by creating a barrier along a primary flight path for species migrating between the United Kingdom and Iceland. The application does not sufficiently examine the long-term consequences of sustained mortality within this corridor or the potential impact on species with limited global populations. From a regulatory standpoint, the application does not meet the necessary evidential standards to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, data gaps, and limitations in modelling all contribute to a failure to achieve the standard of beyond reasonable scientific doubt. This situation engages the precautionary principle and undermines the legal basis for granting consent.

In addition, the identified deficiencies demonstrate non-compliance with the National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to show that internationally important seabird populations will not suffer adverse effects places this proposal in direct opposition to national policy. Collectively, these issues render the assessment unreliable due to its internal inconsistencies, methodological flaws, and insufficient evidence. Such shortcomings impede a thorough evaluation of potential impacts, leading to the conclusion that the application does not fulfil the statutory requirements essential for determination.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development raises serious concerns regarding social impacts, health, and wellbeing due to the lack of transparency in its assessment. Although a Social Impact Assessment was commissioned by the developer, including focus groups with local residents, the complete report remains unpublished. This absence of information creates a substantial evidential gap, obstructing both public understanding and the competent authority's evaluation of social risks identified by the developer's research.

Available summaries reveal that residents are currently facing measurable stress, anxiety, and concern stemming from the scale and proximity of the proposal. These impacts have been derived from direct engagement and should not be regarded as speculative. However, the lack of disclosure concerning the full assessment hinders adequate scrutiny of these findings and restricts the determination of their significance during the decision-making process.

Moreover, there are indications that the proposal poses a direct threat to community identity and cohesion, with “cultural loss” noted in the developer’s findings. Nevertheless, these impacts have not been properly considered in the main application nor given the appropriate weight they deserve. The decision to withhold the full Social Impact Assessment obscures the real human and social costs associated with the development.

This deficiency in transparency undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health impacts is crucial for developments of this magnitude, particularly when community character and functioning may be jeopardised. The failure to provide the complete dataset means the application does not present a thorough evidential basis for evaluating the balance between benefits and harm.

From a policy standpoint, the application does not illustrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments should promote positive health outcomes and avoid adverse effects; however, the evidence available indicates existing negative impacts that remain undisclosed. Without access to the full assessment, compliance with this policy cannot be substantiated.

The implications of these procedural shortcomings are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This omission represents a material flaw within the application and signifies a failure to meet the evidential standards set forth by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing adverse effects, renders the assessment incomplete and untrustworthy. This situation hampers lawful determination and reinforces the conclusion that the application is unsupported by adequate information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline features an open Atlantic horizon and an undeveloped character that contributes to a strong sense of remoteness. The proposed 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 causing a permanent and irreversible transformation of the landscape.

The application does not sufficiently represent the magnitude of the visual change that would occur. The scale and proximity of the turbines are such that they would dominate views from residential areas, historic sites, and widely used coastal locations. This situation would directly impact visual amenity and erode the defining qualities of naturalness and remoteness. The assessment fails to effectively convey the significance of these impacts in the context of such a sensitive landscape.

Concerns also arise regarding the selection and presentation of visual viewpoints within the assessment. Evidence suggests that the chosen viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This oversight raises the possibility that the magnitude of visual impact has been understated, thereby undermining the reliability of the assessment.

Furthermore, there is a notable deficiency in addressing the interconnected relationship between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are intrinsically linked to the wider landscape setting by visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as isolated assets rather than recognising their interdependence, leading to an incomplete evaluation of impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, particularly concerning the protection of natural places and historic assets. The extent 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 thorough worst-case assessment further calls into question any assertion of policy compliance.

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

In summary, the assessment fails to accurately represent the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These deficiencies 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's evaluation of construction and pollution risks lacks comprehensiveness, preventing a thorough assessment of its likely environmental impacts. It entails significant seabed preparation and installation works in a challenging Atlantic environment, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application relies on mitigation and contingency measures that are to be formulated after consent is granted, which hinders any meaningful appraisal of their effectiveness.

This reliance on unspecified future measures raises serious concerns, especially given the sensitivity of the receiving environment. The coastline of West Lewis features clean coastal waters and vital habitats that are susceptible to disturbances from sediment and contamination. While the application acknowledges risks like sediment mobilisation and possible chemical or oil spills, it fails to provide adequate details on prevention, control, or monitoring strategies for these risks.

Additionally, there is uncertainty surrounding the scale and behaviour of sediment plumes that may result from seabed disturbances and cable installations. In the absence of robust modelling and well-defined management strategies, it remains impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty similarly extends to potential repercussions for sensitive marine species and habitats already noted in the broader assessment.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent, the application obstructs the evaluation of whether suitable measures exist to address pollution incidents. This not only introduces procedural risks but also undermines the competent authority's capacity to evaluate environmental protection measures at the determination stage.

From a regulatory standpoint, deferring critical environmental safeguards contradicts the obligations set forth by the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be evaluated prior to granting consent, and without this essential information, a lawful decision cannot be reached. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the absence of defined mitigation strategies, insufficient detailed management plans, and the uncertainty surrounding potential impacts collectively render the assessment materially deficient. These shortcomings hinder a rigorous evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application poses serious concerns regarding the assessment of marine life and fisheries, which appears fundamentally inadequate. The waters off the West Lewis coast are home to a rich marine ecosystem and a thriving fishing industry. However, the application does not convincingly demonstrate how these critical uses and habitats

can be protected against significant disruption.

A troubling aspect of the proposal is the assumption that fishing activities can be relocated without any repercussions. There is no evidence provided to confirm that alternative fishing grounds exist or that they would be accessible and capable of handling increased pressure. This is a significant omission, as forcing fishing displacement could lead to overfishing in other areas, ultimately threatening the livelihoods of the local fishing fleet. Without a thorough and evidence-based assessment, understanding the true impacts on fisheries and the communities dependent on them is impossible.

Moreover, the proposal presents considerable risks to marine species, particularly due to underwater noise from construction activities. The prolonged use of high-energy hammer piling is expected to create disturbances that could affect marine life over extensive areas, including the local population of bottlenose dolphins. The application seems to downplay the predicted effects on these dolphins, despite the serious nature of the threat, lacking adequate evidence to support such minimisation.

There is a troubling inconsistency within the application regarding the need for licences for any harm to European Protected Species. While it acknowledges the requirement for such permits, it simultaneously describes these impacts as negligible. This contradiction seriously undermines the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

Additionally, the assessment does not adequately address the cumulative impacts resulting from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these interrelated effects, it is impossible to ascertain the overall impact on marine ecosystems and the socio-economic conditions tied to them.

From a policy perspective, the application fails to demonstrate compliance with the National Planning Framework 4 and the National Marine Plan. It does not provide assurance that the development can coexist with existing marine users or that it will avoid unacceptable impacts on marine biodiversity, thus hindering any conclusion that the proposal represents sustainable development.

In conclusion, the combination of insufficient evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the application render the assessment incomplete and unreliable. These shortcomings significantly hinder a comprehensive evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The 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 absence of an assessment concerning dark skies and nocturnal wildlife constitutes a significant evidential gap within the Environmental Impact Assessment. The West Lewis coastline is noted for its exceptionally dark skies, which are integral to the

region's environmental quality, cultural identity, and tourism appeal. The proposed introduction of permanent red aviation lighting, which will be visible over substantial distances, is expected to create a continuous and intrusive "wall of light" across the western horizon, fundamentally altering the night-time environment.

There is a notable lack of analysis regarding the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This oversight is particularly relevant given the significance of dark skies to the area's identity and the emerging tourism sector focused on astro-tourism. The failure to evaluate these impacts reveals a considerable gap in the comprehensive landscape and environmental assessment.

Additionally, there is no examination 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, which can result in disorientation and heightened risks of collision. The application has not included any assessment related to lighting impacts or phototaxis studies, thereby neglecting to evaluate how aviation lighting may adversely affect these species or contribute to increased mortality rates.

This shortcoming is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to address nocturnal activity or associated risks. Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this potential threat has not been evaluated. The lack of site-specific night-time data creates a critical void in understanding the ecological impacts involved.

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

From a policy perspective, this omission is at odds with National Planning Framework 4, which pertains to the safeguarding of natural places and the preservation of environmental quality. It also diminishes the overall assessment of landscape and seascape impacts, given that night-time character is a vital aspect of the environment.

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

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal does not meet the requirements for sustainable development as outlined by statutory duties, national policy, and evidential standards. It mirrors the main issues that led to the rejection of the Lewis Wind Power

proposal in 2008, where the degree of industrialisation was deemed unacceptable. This new application is presented under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

The application lacks a complete and reliable evidential basis for determination. There are significant gaps in baseline data, an undefined design envelope, unspecified mitigation measures, and key impact pathways such as nocturnal wildlife, full onshore infrastructure, and tourism effects are missing. Consequently, the Environmental Impact Assessment is incomplete and does not provide a thorough understanding of the likely significant effects or residual impacts.

Procedural failures are evident as well. The absence of a compliant Island Communities Impact Assessment violates statutory requirements under the Islands (Scotland) Act 2018, and the failure to provide the full Social Impact Assessment is a serious omission. These issues hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

This proposal contradicts the National Planning Framework 4. 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 missing tourism impact modelling. Additionally, the cumulative impact of both offshore and onshore elements has not been properly evaluated, leaving effects on peatlands, carbon balance, habitats, and crofting land unclear.

There are considerable uncertainties regarding environmental risks. Assessments of marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in parts. The evidential threshold necessary to confidently exclude adverse effects has not been achieved, which engages the precautionary principle and prevents a lawful conclusion about 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, the disruption of cultural and visual relationships, and negative impacts on tourism represent lasting effects that cannot be adequately mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The magnitude of informational deficiencies, combined with policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority should either refuse consent based on these grounds or utilise the relevant regulatory provisions to demand the missing 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: 142C2A4E

Member of the public 1208

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted for consideration under the relevant marine licensing and Environmental Impact Assessment frameworks. It highlights significant deficiencies across planning, environmental, cultural, and procedural dimensions. Located off the west side of the Isle of Lewis, the area is characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. Concerns regarding the scale, proximity, and design of the proposal emerge due to its potential incompatibility with statutory requirements, national policy, and sustainable development principles.

A critical issue lies in the application's inadequate evidential basis for a lawful determination. There is a notable absence of essential environmental data, while the baseline information provided is both limited and inconsistent. Furthermore, key elements of the proposal remain undefined. The proposal's flexible design framework hinders a clear assessment of likely significant effects. Reliance on unspecified mitigation measures precludes an evaluation of their potential effectiveness. Consequently, the documentation fails to deliver a comprehensive understanding of environmental, cultural, or community impacts, with assertions of negligible or non-significant effects lacking robust evidence.

Moreover, there are evident and substantial conflicts with established policies. The proposal appears misaligned with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural spaces, cultural heritage, and public health and wellbeing. It does not convincingly demonstrate adherence to national obligations aimed at safeguarding biodiversity, climate considerations, and environmental integrity. These inconsistencies directly affect the statutory tests required for consent and hinder the competent authority's capacity to determine the proposal's policy acceptability.

The unprecedented scale of the proposal raises further alarm, with large turbines positioned uncomfortably close to the shoreline, which introduces serious concerns related to landscape capacity, visual impact, and environmental repercussions. Collectively, the insufficiency of information, dependence on undefined mitigation, evidential shortcomings, and clear policy discrepancies illustrate that the application is incomplete and incapable of facilitating a lawful determination. In light of these circumstances, it is imperative that the precautionary principle be applied.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The failure to publish the complete Social Impact Assessment raises serious concerns regarding the social impacts, health, and wellbeing of the community. Although the developer engaged local residents through focus groups, the absence of the full report creates a critical evidential gap that hinders public understanding and the competent authority's evaluation of the identified social risks. This lack of transparency not only undermines public trust but also obstructs proper scrutiny of the findings, which are vital for determining their significance in the decision-making process.

Available summaries show that residents are already experiencing significant stress, anxiety, and concern related to the scale and proximity of the proposed development. These impacts, rooted in direct community engagement, are concrete and not speculative. Additionally, there is evidence that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. However, these critical impacts have not been adequately integrated into the main application or considered with the seriousness they deserve. Consequently, withholding the full assessment obscures the true human and social costs associated with the development.

This lack of transparency further compromises the Environmental Impact Assessment process. For developments of such magnitude, it is essential to fully understand the social, economic, and health implications, especially when community character and functioning are at risk. The omission of the complete dataset within the application denies a comprehensive evidential basis for balancing potential benefits against the associated harms.

From a policy standpoint, the application fails to comply with National Planning Framework 4 regarding health and wellbeing. Development should foster positive health outcomes and mitigate harm; however, the evidence suggests existing adverse effects that remain undisclosed. Without access to the full assessment, it is impossible to demonstrate compliance with this crucial policy.

The procedural ramifications are significant, as the competent authority cannot conduct a thorough socio-economic and health evaluation without the full Social Impact Assessment. This omission constitutes a material failure within the application, breaching the evidential requirements mandated by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, alongside evidence of current adverse impacts, leads to an incomplete and unreliable assessment. This undermines the potential for a lawful determination and firmly indicates that the application lacks sufficient supporting information.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal's separation of offshore turbines and onshore works results in a materially incomplete assessment, failing to fully account for the integrated nature of the project. This fragmented approach obscures the true scale of the environmental and socio-

economic impacts, as the onshore elements, which include cabling across protected moorland and the construction of a substation near Stornoway, are not adequately assessed alongside their offshore counterparts.

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

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

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

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

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

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development as evaluated against statutory duties,

national policy, and evidential standards. Similar to the Lewis Wind Power proposal, which was rejected in 2008 due to unacceptable industrialisation, this application is now being assessed under an improved policy framework that emphasizes biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant deficiencies in the evidential basis provided for this application. It lacks comprehensive baseline data, relies on an undefined design envelope, and depends on unspecified mitigation measures. Crucial impact pathways concerning nocturnal wildlife, full onshore infrastructure, and tourism effects have been overlooked. Consequently, the Environmental Impact Assessment is incomplete, preventing a thorough understanding of the likely significant effects or residual impacts.

Moreover, there are procedural failings that cannot be ignored. The absence of a compliant Island Communities Impact Assessment is a breach of statutory duty under the Islands (Scotland) Act 2018. Additionally, the failure to present a complete Social Impact Assessment is 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.

This proposal directly contradicts National Planning Framework 4 by failing to protect biodiversity, natural places, and cultural heritage. It does not demonstrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative impact of both offshore and onshore elements has not been thoroughly assessed, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

The environmental risks associated with this proposal are uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals remain incomplete and inconsistent. The evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and preventing a lawful conclusion regarding acceptable impacts.

Furthermore, the proposal would bring about substantial and irreversible changes to a sensitive landscape. The industrialization of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual relationships, and effects on tourism represent permanent impacts that cannot be adequately mitigated.

In summary, this application is procedurally and substantively unfit for determination. The scale of information deficiencies, alongside policy conflicts and unresolved environmental risks, obstruct a lawful and evidence-based decision. Therefore, a formal request is made for the refusal of consent for the Spiorad na Mara Offshore Wind Farm in its entirety.

Additional Comments

By the time construction is completed, we will be left with roads in an agricultural state. The westside of the island will become an industrial footprint, and its stunning coast scarred for life.
I also ask, what is the lifespan of these turbines, 20 years? Then the process starts again!!

Yours faithfully,

[Redacted]

Member of the public 1209

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.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species lacks completeness and reliability regarding ecological receptors in the West Lewis coastal environment. This area is biologically active and highly sensitive, yet the baseline data remains inadequate, and the methodologies employed do not effectively capture the presence, behaviour, and habitat use of various species. Consequently, the assessment fails to provide a credible evidential basis for evaluating potential impacts.

Significantly, the assessment neglects to properly account for otters, a European Protected Species, particularly their active use of coastal regions for foraging and movement. This oversight regarding their core foraging range and behavioural patterns results in an insufficient evaluation of the impacts of construction disturbance, noise, and increased activity, ultimately undermining any conclusions about the absence of significant effects on this species.

Deficiencies are also present in the evaluation of basking sharks, where the reliance on aerial surveys leads to considerable detection bias, particularly under Atlantic conditions. This method is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that show frequent usage of these waters. The failure to integrate or adequately consider this data contributes to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings mean that any claims of negligible or non-significant effects are founded on assumptions rather than sound evidence. The lack of sufficient baseline data obstructs a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This engenders uncertainty concerning the actual risk to marine species and their habitats.

From a regulatory standpoint, the application does not comply with the Environmental Impact Assessment regime or National Planning Framework 4, given that protected species have not been properly identified or assessed. The uncertainty this introduces prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, lawful consent cannot be granted.

In summary, the presence 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 conclusion 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.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer’s failure to publish the full Social Impact Assessment is a critical concern that undermines the evaluation of social impacts, health, and wellbeing

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

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

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

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

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments are required to promote positive health outcomes and avoid harm; however, existing adverse effects are evident and have not been fully revealed. Without the full assessment, compliance with this policy cannot be established.

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the potential impacts on seascape, landscape, and visual aspects is fundamentally lacking and does not truly capture the extent of the changes or the delicate nature of the environment. The West Lewis coastline is characterised by its

expansive Atlantic horizon, its undeveloped nature, and a strong feeling of remoteness. The proposal to install large-scale turbines near the shoreline would introduce a continuous and imposing industrial presence, drastically altering this character and leading to a permanent and irreversible change in the landscape.

Moreover, the application fails to adequately portray the extent of the visual alterations expected. Due to their size and proximity, the turbines would overshadow 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 accurately reflect the significance of these impacts within such a sensitive landscape.

Concerns also arise regarding the methods used to select and present visual viewpoints. There is evidence suggesting that these viewpoints may not sufficiently represent the most sensitive receptors or the worst-case scenarios, particularly concerning significant cultural heritage sites and landscapes of high value. This poses a risk that the severity of the visual impact has been minimised, calling into question the reliability of the assessment.

Another notable shortcoming is the failure to evaluate the interconnected relationship among landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape context, linked visually and spatially to the Atlantic horizon. The assessment treats these sites as separate entities rather than recognising their interdependence, leading to an incomplete understanding of the impacts on their context and cultural significance.

The industrialisation of the seascape would disrupt these connections, changing how heritage assets are perceived and severing their ties to the natural horizon. This represents not just a visual impact but a wider cultural and spatial harm that has not been sufficiently examined within the application.

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

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

In conclusion, the assessment fails to accurately depict the extent of the impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage.

These shortcomings hinder a trustworthy evaluation and reinforce the conclusion that the proposal is incompatible with the preservation of this landscape.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and an active fishing industry. However, the assessment of fisheries and marine life provided in the application is inadequate, failing to deliver a comprehensive evaluation of ecological and socio-economic impacts. The application lacks evidence that fishing activities can be displaced without significant consequences, raising concerns about the potential for overfishing in alternative locations. This oversight is critical, as the absence of alternative fishing grounds that are accessible and capable of supporting increased pressure risks economic repercussions for the local fishing fleet.

Moreover, the proposal poses substantial risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over an extended timeframe is likely to disturb marine life over large distances, specifically affecting species such as dolphins. The anticipated disturbance to a notable segment of the local bottlenose dolphin population is concerning, yet the application appears to downplay the significance of these potential impacts without adequate supporting evidence.

An inconsistency within the application arises from the acknowledgement of the need for licences to permit harm to European Protected Species while simultaneously stating that the impacts are negligible. This contradiction diminishes the credibility of the assessment and raises serious questions regarding compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

Furthermore, the assessment does not take into account the 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 fails to demonstrate adherence to the National Planning Framework 4 and the National Marine Plan. It does not establish that the development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity, which inhibits any determination 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 shortcomings hinder a robust evaluation of the impacts on marine life and fisheries.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development as dictated by statutory responsibilities, national policy, and evidential standards. It mirrors the primary issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was identified. This application is now submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

The evidential basis for determining the application is neither complete nor reliable. Significant gaps exist in the baseline data, and the application continues to rely on an undefined design envelope. The proposed mitigation measures remain unspecified, and critical impact pathways such as nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects have not been adequately addressed. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of the likely significant effects or residual impacts.

Furthermore, there are notable procedural inadequacies. The lack of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018, while the omission of a full Social Impact Assessment is a material shortfall. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal stands in direct opposition to National Planning Framework 4. It does not demonstrate the protection of biodiversity, natural areas, and cultural heritage; it fails to prove that health and wellbeing impacts are acceptable; and it cannot establish a net economic benefit due to the lack of tourism impact modelling. The cumulative impact of both offshore and onshore components has not been thoroughly assessed, which obscures their effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks are uncertain and potentially significant. The evaluations of marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, inconsistent. The evidential threshold required to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and inhibiting a lawful determination that impacts are acceptable.

This proposal would induce substantial and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruptions to cultural and visual relationships, and tourism impacts all represent enduring effects that cannot be sufficiently mitigated.

In summary, the application is procedurally and substantively unfit for determination. The extent of information deficiencies, coupled with policy conflicts and unresolved environmental risks, precludes a lawful, evidence-based decision. The competent authority must either refuse consent on these bases or utilise the relevant regulatory provisions to mandate 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

In a progressively depleted natural environment, our remaining places of outstanding beauty are valuable not only for ecological intact ness, upon which we ultimately depend, but for our wellbeing, belonging and identity. Why is Scotland celebrated for its beauty, nature and wilderness? Because some remains. We must not exploit these last places, for economic gain. These places are our cultural heritage, our ancestors heritage, and our children's inheritance. Once changed, they will be changed forever, and that value never recovered. This not the right place for this development. The impact is disproportionate to the gain. Consideration of the irreparable damage that would be done must be taken very seriously. Please don't dismiss value that cannot be covered in profit. We all need more than that, and owe our children more too.

Yours faithfully,

[Redacted]

Member of the public 1210

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.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The deficiencies within the Environmental Impact Assessment Report are substantial and undermine its reliability as a measure of the potential environmental effects of the proposal. The introduction of a flexible Project Design Envelope, which lacks definitive commitments regarding turbine dimensions, layouts, or configurations, generates considerable uncertainty. This situation precludes a consistent application of a worst-case scenario analysis and ultimately compromises the integrity of the assessment. Consequently, the impacts presented may not accurately represent the development that will be constructed, thereby hindering both public understanding and the competent authority's ability to gauge the true extent of environmental effects.

Furthermore, the application places excessive reliance on mitigation measures, monitoring strategies, and management plans that are not yet established. Seeking consent on the premise that environmental harm will be addressed in the future obstructs any meaningful evaluation of the effectiveness of these measures or assessment of residual impacts. This postponement of essential information to post-consent stages is procedurally unacceptable and contravenes the fundamental aims of the Environmental Impact Assessment framework, which necessitates that significant effects and their mitigations are clearly defined prior to any determination.

There are also significant evidential gaps, including insufficient baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. Such shortcomings create uncertainty regarding the magnitude and significance of impacts, particularly in instances where conclusions of negligible or non-significant effects are asserted without adequate supporting data. The lack of sufficient information obstructs a thorough understanding of cumulative and worst-case impacts and fosters scientific uncertainty that is incompatible with statutory requirements.

As a result, the application fails to satisfy the evidential standards mandated by the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. The proposal also does not demonstrate adherence to the National Planning Framework 4, particularly with respect to biodiversity protection and environmental integrity, as it cannot be substantiated that impacts have been fully assessed or that appropriate safeguards are in place.

In summary, the reliance on an unspecified design envelope, the absence of concrete mitigation measures, and the gaps in baseline data collectively render the Environmental Impact Assessment Report not only unreliable but also incomplete. These significant deficiencies impede a lawful and comprehensive assessment of environmental effects, leaving the competent authority without the necessary information to properly evaluate the application.

MARINE ECOLOGY AND PROTECTED SPECIES

The marine ecology assessment related to the proposed development suffers from significant deficiencies that compromise our understanding of ecological receptors in

the West Lewis coastal environment. This area is noted for its sensitivity and biological activity, yet the data provided is incomplete, and the methodologies utilised do not adequately capture the presence, behaviour, and habitat use of species in this ecosystem. Consequently, the evidential basis for evaluating potential impacts is fundamentally flawed.

A critical oversight in the assessment involves otters, recognised as a European Protected Species. The application neglects to properly account for their active foraging and movement in coastal areas. This lack of attention to their core foraging range and behavioural patterns means that the possible impacts from construction disturbance, noise, and increased human activity have not been thoroughly assessed. Such omissions undermine any assertions regarding the absence of significant effects on otters.

Similarly, the assessment of basking sharks is inadequate, with a heavy reliance on aerial surveys that introduce significant bias in detection, particularly under typical Atlantic conditions. This methodology is likely to lead to an underestimation of their presence in the waters concerned, especially in light of established land-based observations that indicate frequent use of these areas. The failure to consider such pertinent data results in an incomplete baseline and diminishes the credibility of the conclusions drawn.

The methodological flaws present in the assessment suggest that conclusions regarding negligible or non-significant effects are founded on assumptions rather than solid evidence. Furthermore, the lack of sufficient baseline data obstructs a meaningful evaluation of cumulative and indirect impacts, which should encompass seasonal variations and broader ecosystem interactions. This gap creates a level of uncertainty about the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the Environmental Impact Assessment requirements or the standards set by National Planning Framework 4, as protected species have not been sufficiently identified or assessed. This introduction of uncertainty prevents the possibility of excluding adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these conditions, it is clear that consent cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions leads to an unreliable assessment. These shortcomings hinder a thorough evaluation of impacts on marine ecology and protected species, ultimately highlighting the lack of a sufficient evidential foundation for the application.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the ornithological impacts associated with this development is fundamentally flawed. There are significant gaps in the evidence provided, as well as internal inconsistencies that undermine the validity of its conclusions. The proposal is situated within key foraging areas and migratory pathways along the west coast of the

Isle of Lewis, which supports internationally important seabird populations that are already in decline. However, the application does not adequately demonstrate that these species will not be adversely affected.

A notable contradiction within the application arises from the developer's conclusion of no significant adverse effects, while simultaneously putting forth a Habitats Regulations derogation case. This derogation is only necessary when significant harm is anticipated, raising questions about the reliability of the assessment and suggesting that its conclusions lack robust evidence. Furthermore, the assessment fails to adequately establish that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unharmed. The crucial feeding grounds associated with these species are not fully taken into account, and the reliance on modelling approaches introduces additional uncertainty, particularly concerning species that are severely declining, such as Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, especially in instances where baseline data is incomplete and the behavioural responses of the birds are not thoroughly understood.

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

From a regulatory standpoint, the application fails to meet the evidential standards needed to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, along with gaps in data and limitations in modelling, indicates that the requisite standard of beyond reasonable scientific doubt has not been attained. This situation engages the precautionary principle and obstructs a lawful conclusion that would support consent.

Additionally, the deficiencies identified suggest a non-compliance with the National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to prove that internationally important seabird populations will not be negatively affected places the proposal at odds with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is fundamentally flawed, failing to acknowledge the West Lewis coastline as a dynamic cultural landscape where the environment, language, tradition, and community are deeply intertwined. It adopts a simplistic viewpoint, treating heritage as mere isolated assets rather than recognising their ongoing social, cultural, and spiritual relevance to the community.

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

Moreover, the application overlooks intangible cultural heritage elements, including the Gaelic language and traditions, as well as the long-standing connection between the community and the coastal environment. These factors are vital to the area's identity but are conspicuously absent from the assessment, representing a serious omission. Without acknowledging these aspects, the cultural impact of the development cannot be accurately gauged.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population holds a distinct cultural identity, recognised as that of an Indigenous People; however, no Free, Prior and Informed Consent process has been followed. This lack of meaningful engagement undermines the assessment's credibility and fails to adhere to established principles of participation in matters affecting cultural and environmental interests.

Additionally, the absence of a compliant Island Communities Impact Assessment is a critical procedural failure. This assessment is a statutory requirement under the Islands (Scotland) Act 2018. Without it, the competent authority is unable to fulfil its legal responsibility to evaluate the social, cultural, and economic impacts on the island community, thereby preventing a lawful determination.

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

Collectively, the neglect to assess living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application fails to provide a robust basis for determining the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of health, wellbeing, and social impacts related to this development is fundamentally inadequate and lacks the necessary transparency for a lawful evaluation. Although the developer initiated a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This failure creates a significant evidential gap, hindering both public understanding and the competent authority's ability to assess the complete range of social risks identified by

the developer's own research.

Available summaries suggest that local residents are already experiencing considerable stress, anxiety, and concern due to the scale and proximity of the proposal. These observations stem from direct engagement and are not mere speculation. The decision to withhold the full assessment restricts proper scrutiny of the findings and diminishes the capacity to evaluate their importance in the decision-making process.

Furthermore, there is evidence that the proposal threatens community identity and cohesion, with the developer's own findings noting "cultural loss." Despite this, such impacts have not been adequately incorporated into the main application or assigned appropriate weight. By not disclosing the complete Social Impact Assessment, the developer obscures the genuine human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is vital for developments of this magnitude, especially when they may influence community character and functioning. The failure to provide the full dataset means that the application does not offer a complete evidential basis for assessing the balance between benefits and 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 mitigate harm, yet existing evidence points to adverse effects that have not been fully revealed. Without the complete assessment, adherence to this policy cannot be substantiated.

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 material omission in the application and constitutes a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

Ultimately, the failure to disclose the full Social Impact Assessment, along with evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This situation prevents a lawful determination and reinforces the view that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon and a strong sense of remoteness, aspects that are integral to its undeveloped nature. The introduction of large-scale turbines near the shoreline threatens to impose a continuous industrial presence, which would fundamentally alter this unique character. This change would result in a permanent and irreversible transformation of

the landscape, overshadowing the natural beauty that defines the area.

Concerns regarding the assessment of visual impacts are significant. The application fails to accurately represent the magnitude of change that would occur. The sheer scale and close proximity of the turbines mean that they would dominate views from residential areas and historic sites, as well as from popular coastal locations. Such dominance would erode the visual amenity and diminish the defining qualities of naturalness and remoteness within this sensitive landscape, yet this level of impact is not adequately conveyed in the assessment.

Methodological issues also arise concerning the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints do not sufficiently capture the most sensitive receptors or worst-case scenarios, particularly related to key cultural heritage sites and high-value landscapes. This raises concerns that the visual impact may have been understated, which undermines the credibility of the assessment.

Moreover, there is a failure to evaluate the interconnected relationships between landscape, seascape, and cultural heritage. Significant sites like the Calanais Standing Stones and other Scheduled Monuments are interlinked with the wider landscape, sharing visual and spatial connections to the Atlantic horizon. However, the assessment treats these sites as isolated entities, neglecting their interdependence, which results in an incomplete understanding of how the proposal would impact their setting and cultural significance.

The industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are experienced and severing their ties to the natural horizon. This is not merely a visual issue; it represents a broader cultural and spatial harm that has not been thoroughly assessed within the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, particularly concerning the protection of natural places and historic assets. The scale of proposed changes contradicts the need to safeguard landscape character, visual amenity, and the settings of culturally significant sites. Additionally, the lack of a robust worst-case assessment further weakens any argument for policy compliance.

It is clear that the identified impacts cannot be effectively mitigated. The dominance of the turbines due to their scale, height, and proximity means that their presence would be unavoidable. Consequently, the change would be fundamental and permanent, not something that could be reduced to an acceptable level through mitigation measures.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal entails significant seabed preparation and installation activities within a high-energy Atlantic environment. However, the assessment of construction and pollution risks is lacking in 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 that are intended to be established after consent is granted, which impedes any meaningful evaluation of their adequacy or effectiveness.

This dependence on undefined future measures raises serious concerns, especially in light of the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it falls short in providing adequate details on prevention, control, or monitoring strategies.

Additionally, there is uncertainty regarding the extent and behaviour of sediment plumes resulting from seabed disturbance and cable installation. In the absence of robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of these disturbances. This uncertainty also extends to potential effects on marine species and habitats identified as sensitive in the broader assessment.

The lack of detailed emergency response procedures further exacerbates these issues. By postponing contingency planning to a post-consent phase, the application hinders the ability to evaluate whether proper safeguards are in place to manage pollution events, introducing procedural risks that undermine the competent authority's capacity to assess environmental protection measures at the point of decision-making.

From a regulatory standpoint, the deferment of essential environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation strategies be assessed before consent is granted, and the absence of such information renders a lawful determination impossible. Furthermore, the application does not demonstrate compliance with policy requirements pertaining to environmental protection and water quality.

In conclusion, the combined absence of defined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts lead to a materially deficient assessment. These shortcomings prevent a thorough evaluation of construction and pollution risks and reinforce the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application lacks a robust evaluation of the ecological and socio-economic impacts on fisheries and marine life. The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the

proposal fails to adequately demonstrate how these habitats and activities can be protected or maintained without significant disruption.

One major concern is the assumption that fishing activities can be displaced without negative consequences. The application does not provide evidence that alternative fishing grounds are available, accessible, or capable of supporting any additional pressure. This is a critical omission, as such displacement poses a risk of overfishing in other areas and could have broader economic repercussions for the local fishing fleet. Without a clear, evidence-based assessment, the potential impacts on fisheries and the livelihoods dependent on them remain unclear.

The proposal also poses considerable risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over an extended period is likely to cause significant disturbance over large distances, affecting species such as dolphins. The anticipated disturbance to a considerable portion of the local bottlenose dolphin population is particularly concerning, yet the application appears to downplay the significance of these effects without adequate supporting evidence.

There is a notable inconsistency in the application regarding the need for licences to permit harm to European Protected Species, acknowledged while simultaneously claiming the impacts are negligible. This contradiction raises doubts about the credibility of the assessment and raises issues of compliance with the Habitats Regulations, especially where harm is anticipated to the extent that legal authorisation would be necessary.

Moreover, the assessment does not consider cumulative impacts resulting from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, it is impossible to determine the overall impact on marine ecosystems and socio-economic conditions.

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

In summary, the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the application all contribute to an assessment that is incomplete and unreliable. These shortcomings hinder a thorough evaluation of the impacts on marine life and fisheries.

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.

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: BCF71016

Member of the public 1211

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted in accordance with the relevant marine licensing and Environmental Impact Assessment regimes. A review of the Environmental Impact Assessment Report and associated documentation has revealed material deficiencies in planning, environmental considerations, cultural aspects, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and robust cultural identity. Concerns arise regarding the scale, proximity, and design of the project, which challenge its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application does not provide a sufficient evidential foundation for a lawful determination. Significant environmental data is absent, baseline information is both limited and inconsistent, and several key elements of the proposal remain unspecified. The application's flexible design framework hinders a clear assessment of potential significant effects, and the reliance on unspecified mitigation measures means that their effectiveness cannot be evaluated. Consequently, the available 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 evident and serious policy conflicts present in the proposal. It 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. The application does not sufficiently demonstrate adherence to national mandates aimed at safeguarding biodiversity, climate interests, and environmental integrity. Such discrepancies directly relate to the statutory tests necessary for consent and compromise the competent authority's capacity to deem the development acceptable in policy terms.

The proposal's scale is unprecedented for this location, featuring large turbines situated in close proximity to the shoreline. This introduces significant concerns regarding landscape capacity, visual dominance, and environmental impacts. Collectively, the lack of adequate information, reliance on undefined mitigation measures, evidential shortcomings, and clear policy non-compliance illustrate that the application is incomplete and unable to support a lawful determination. Under these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application for the proposed development is significantly flawed due to its reliance on an undefined Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations. This introduces substantial uncertainty and hampers the ability to apply a worst-case scenario consistently. As a result, the assessment's integrity is compromised, leaving both the public and the competent authority without a clear understanding of the potential environmental impacts that may arise from the actual construction.

Furthermore, the Environmental Impact Assessment Report does not adequately define mitigation measures, monitoring strategies, or management plans, as these are proposed to be established at a later stage. Seeking consent under these conditions means that there can be no meaningful evaluation of the effectiveness of these measures, nor can the residual impacts be properly assessed. This approach is procedurally unacceptable and goes against the fundamental objectives of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation strategies be clearly outlined before any determination is made.

There are notable evidential shortcomings present, including insufficient baseline data, methodological limitations, and an over-reliance on assumptions instead of site-specific evidence. Such deficiencies lead to uncertainties concerning the scale and significance of the impacts, particularly when conclusions regarding negligible or non-significant effects are drawn without robust data to support them. The lack of comprehensive information hinders a clear understanding of cumulative and worst-case scenarios, creating scientific uncertainties that cannot be reconciled with statutory obligations.

Consequently, the application fails to meet the evidential standards required under the Habitats Regulations, which are necessary to exclude adverse effects beyond reasonable scientific doubt. This situation activates the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to the National Planning Framework 4, particularly in relation to the safeguarding of biodiversity and environmental integrity, as it cannot confirm that all 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 strategies, and the existence of gaps in baseline data results in an Environmental Impact Assessment Report that is both unreliable and incomplete. These shortcomings impede a lawful and thorough assessment of environmental effects, ultimately leaving the competent authority without the necessary information to make an informed decision on the application.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal lacks transparency and depth in assessing social impacts, health, and wellbeing, which is critical for a lawful evaluation. Although the developer commissioned a Social Impact Assessment that included focus groups with local

residents, the full report remains unpublished. This absence signifies a notable evidential gap, hindering both public insight and the competent authority's understanding of the social risks identified in the developer's own research.

Summaries suggest that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts arise from direct community engagement and are not speculative in nature. However, without access to the complete assessment, there is limited capacity for proper scrutiny of these findings, which in turn restricts the evaluation of their significance in the decision-making process.

Furthermore, there is clear evidence indicating that the proposal is viewed as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Unfortunately, these impacts have not been thoroughly integrated into the main application, nor have they received the weight they warrant. The failure to disclose the full Social Impact Assessment obscures the actual human and social costs associated with the development.

This lack of transparency undermines the Environmental Impact Assessment process. An exhaustive understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functionality are at stake. By withholding the full dataset, the application does not provide a complete evidential basis necessary for weighing benefits against potential harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Developments should promote positive health outcomes and mitigate harm, yet the evidence at hand reveals adverse effects that remain undisclosed. Without the full assessment, compliance with this policy cannot be validated.

The procedural implications of this situation are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a significant omission in the application and a failure to fulfil the evidential requirements of the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing adverse effects, renders the assessment inadequate and unreliable. This situation obstructs a lawful determination and reinforces the notion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts and their implications for seascape and landscape quality is insufficient and fails to capture the true extent of change anticipated in the area. The character of the West Lewis coastline is characterised by an expansive

Atlantic horizon, a largely undeveloped environment, and a profound sense of remoteness. The planned installation of large turbines near the shoreline would introduce a persistent industrial presence, fundamentally transforming this unique landscape and resulting in an irreversible alteration of its character.

The proposal does not fully address the extent of the visual changes that would occur. Given their size and proximity, the turbines are likely to dominate views from nearby residential areas, historic sites, and frequently visited coastal spots. This dominance would negatively affect visual amenity and undermine the essential qualities of naturalness and remoteness associated with the area. The assessment inadequately conveys the significance of this impact in relation to the sensitivity of the surrounding landscape.

Methodological issues also arise concerning the choice and depiction of visual viewpoints. Evidence indicates that the selected viewpoints may not adequately represent the most sensitive receptors or the most severe scenarios, particularly concerning key cultural heritage sites and landscapes of high value. Such a shortcoming risks underestimating the visual impact, which jeopardises the reliability of the assessment.

Additionally, the assessment neglects to evaluate the interconnectedness of landscape, seascape, and cultural heritage. Significant sites, including the Calanais Standing Stones and other Scheduled Monuments, are integral to a broader landscape context that is visually and spatially linked to the Atlantic horizon. The evaluation incorrectly treats these sites as standalone entities, disregarding their interrelationships, which leads to an incomplete analysis of their setting and cultural relevance.

The proposed industrialisation of the seascape threatens to disrupt these connections, altering how heritage assets are perceived and severing their ties to the natural horizon. This situation presents not merely a visual concern but extends to broader cultural and spatial detriments that the application fails to adequately consider.

From a policy standpoint, the proposal is at odds with the National Planning Framework 4 regarding the preservation of natural environments and historical assets. The scale of transformation proposed does not comply with the necessary protections for landscape character, visual amenity, and the settings of sites of cultural importance. The lack of a comprehensive worst-case scenario assessment further diminishes the credibility of the proposal's alignment with policy requirements.

Moreover, it is evident that the identified impacts cannot be satisfactorily mitigated. The size, height, and proximity of the turbines would result in a presence that is both dominant and unavoidable. Thus, the anticipated changes are foundational and permanent, incapable of being reduced to an acceptable level through mitigation efforts.

In conclusion, the assessment fails to accurately portray the scale of impact, the

sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings undermine the ability to conduct a reliable evaluation and reinforce the assertion that the proposal is incompatible with the protection of this significant landscape.

FISHERIES AND MARINE LIFE

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

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

Additionally, the proposal poses significant risks to marine species, particularly due to the underwater noise generated by construction activities. The anticipated use of high-energy hammer piling over a prolonged period is likely to disturb marine life across extensive areas, which includes species such as dolphins. The potential disturbance to a large portion of the local bottlenose dolphin population raises serious concerns, yet the application minimizes these impacts without adequate justification.

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

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

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

Overall, the absence of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the inconsistencies within the application result in an

incomplete and unreliable assessment. These shortcomings hinder a proper evaluation of the implications for marine life and fisheries.

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding dark skies and nocturnal wildlife represents a significant gap in the Environmental Impact Assessment. The West Lewis coastline is noted for its exceptionally dark skies, which are crucial for environmental quality, cultural identity, and the tourism sector. The introduction of permanent red aviation lighting will be visible over long distances and creates a continuous intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

The proposal fails to evaluate the effects of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This is especially important given the role of dark skies in the area's identity and the potential for growth in tourism sectors such as astro-tourism. The omission of these impacts results in a notable shortfall in the overall landscape and environmental assessment.

Additionally, there is a complete absence of evaluation regarding the impacts on nocturnal wildlife. Species like the Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly sensitive to artificial lighting due to their phototactic responses, which can lead to disorientation and higher collision risks. The application lacks any lighting impact assessment or study of phototaxis, failing to consider how the proposed aviation lighting could affect these species or increase mortality rates.

This issue is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not account for nocturnal activities or associated risks. Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this concern has not been addressed. The absence of site-specific night-time data presents a critical gap in understanding the ecological impacts of the proposal.

Without a thorough assessment of nocturnal impacts, it becomes impossible to determine whether protected species or designated sites could be adversely affected. The necessary evidential standard to exclude adverse effects beyond reasonable scientific doubt remains unmet, invoking the precautionary principle and hindering a lawful determination.

From a policy perspective, this omission contradicts the National Planning Framework 4 regarding the protection of natural areas and environmental quality. Furthermore, it undermines the overall assessment of landscape and seascape impacts, as the character of night-time is a vital component of the environment.

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

and species-specific analysis renders the application incomplete and unable to support a lawful determination.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal does not meet the requirements of sustainable development when evaluated against statutory duties, national policy, and evidential standards. This application revisits issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. The current proposal is presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant gaps in the evidential basis for determination within the application. It lacks complete baseline data, employs an undefined design envelope, relies on unspecified mitigation measures, and omits crucial impact pathways concerning nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, preventing a thorough understanding of likely significant effects or residual impacts.

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

The proposal conflicts with National Planning Framework 4, as it does not protect biodiversity, natural places, or cultural heritage, nor does it demonstrate acceptable health and wellbeing impacts. It also fails to provide evidence of a net economic benefit due to the lack of tourism impact modelling. The cumulative impact of both offshore and onshore elements has not been adequately assessed, obscuring potential effects 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, coupled with internal inconsistencies, have not met the evidential threshold required to exclude adverse effects beyond reasonable scientific doubt. This necessitates the application of the precautionary principle, preventing a lawful conclusion regarding acceptable impacts.

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

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

determination. The scale of information deficiencies, coupled with policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. It is imperative that the competent authority either refuses consent on these grounds or invokes the relevant regulatory provisions to compel the submission of the missing information.

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

Additional Comments

There has not been enough thought put into how this will affect locals, and the uninterrupted views out across the Atlantic Ocean. The wind farms will not directly benefit the community that it will have the biggest detrimental impact upon. There are so many reasons to object to it.

Yours faithfully,

[Redacted]

Member of the public 1212

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 and fails to deliver a comprehensive, transparent, or reliable evaluation of the potential environmental impacts associated with the proposal. The introduction of a flexible Project Design Envelope, lacking a commitment to specific turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This ambiguity hinders a consistent application of a worst-case scenario, thereby compromising the integrity of the assessment. As a result, the impacts detailed may not accurately represent the development that is ultimately realised, obstructing both public understanding and that of the competent authority regarding the true extent of environmental consequences.

Furthermore, the application places substantial reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent based on the premise that any environmental harm will be rectified at a later stage precludes a meaningful evaluation of the effectiveness of such measures or an assessment of residual impacts. This postponement of critical information to post-consent phases is procedurally inappropriate and contradicts the core objectives of the Environmental Impact Assessment framework, which mandates that likely significant effects and mitigations be clearly established before a determination is made.

There exist notable evidential deficiencies as well, encompassing gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This leads to uncertainty about the scale and significance of impacts, particularly when conclusions regarding negligible or non-significant effects are offered without solid supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that is incompatible with statutory requirements.

Consequently, the application does not meet the evidential threshold mandated by the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This necessitates the precautionary principle's application, especially regarding protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it cannot be established that impacts have been comprehensively assessed or that appropriate safeguards are present.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The coastal environment of West Lewis is a biologically active marine system that is highly sensitive. However, the assessment of marine ecology and protected species is

materially deficient, failing to provide a complete or reliable understanding of ecological receptors within this area. The baseline data remains incomplete, and the methodologies employed do not adequately capture the presence, behaviour, and habitat use of various species. This inadequacy results in a lack of a sound evidential basis for evaluating potential impacts.

A significant shortcoming in the assessment pertains to otters, which are classified as a European Protected Species. The application neglects to properly recognise and assess their active use of coastal areas for foraging and movement. The core foraging range and behavioural patterns of otters have not been adequately considered, meaning that potential effects from construction disturbances, noise, and increased activity remain unassessed. Consequently, this oversight undermines any conclusions drawn regarding the absence of significant effects on this species.

Further issues arise in the assessment of basking sharks, where the reliance on aerial surveys introduces notable detection bias, particularly given the challenging Atlantic conditions. This methodology is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that suggest frequent use of these waters. The failure to incorporate or properly consider such data results in an incomplete baseline and diminishes the reliability of the conclusions presented.

The methodological limitations evident in the assessment lead to conclusions of negligible or non-significant effects being based on assumptions rather than robust evidence. Furthermore, the lack of sufficient baseline data obstructs a meaningful assessment of cumulative and indirect impacts, including seasonal variation and broader ecosystem interactions. This creates uncertainty surrounding the true scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as the identification and assessment of protected species are inadequate. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus engaging the precautionary principle. Under these circumstances, granting consent cannot be justified in a lawful manner.

Overall, 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, culminating in the conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application under consideration presents significant deficiencies in its ornithological assessment, which is flawed due to substantial gaps in evidence and internal contradictions that challenge its conclusions. Situated on the west coast of the

Isle of Lewis, an area that supports seabird populations of international importance, the proposal fails to adequately demonstrate that these species, many of which are already in decline, will not experience adverse impacts. The proposed development is located within crucial foraging areas and migratory corridors, yet the assessment does not thoroughly evaluate the risks of displacement, collision, or habitat loss for these birds.

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed application exhibits a fundamental inadequacy in its assessment of cultural heritage and community identity, failing to recognise the West Lewis coastline as a living cultural landscape where the environment, language, tradition, and

community are intrinsically linked. The approach taken is reductive, treating heritage as isolated and static assets rather than acknowledging their ongoing social, cultural, and spiritual roles within the community.

A notable deficiency is evident in the treatment of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas. These sites are active places of burial and spiritual practice; however, the assessment categorises them merely as static features. This mischaracterisation neglects their continued use and the impact of development on their setting, leading to an incomplete evaluation of cultural effects and disregarding their importance within community life.

Moreover, the application does not assess intangible cultural heritage, such as the Gaelic language, traditions, and the long-standing relationship between the community and the coastal environment. These elements are central to the area's identity, yet they are entirely absent from the assessment, signifying a major oversight. The lack of consideration for these factors obstructs a proper understanding of the cultural impact of the development.

Concerns also arise regarding community rights and engagement, particularly as the Gaelic-speaking population embodies a distinct cultural identity with characteristics of an Indigenous People. The absence of a process of Free, Prior and Informed Consent undermines the legitimacy of the assessment and fails to adhere to established principles of participation in decisions that affect cultural and environmental interests.

A critical procedural failure is the lack of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. Without this essential assessment, the competent authority is unable to fulfil its legal duty to evaluate the social, cultural, and economic impacts on the island community, rendering a lawful determination unattainable.

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

Overall, the collective failures to assess living heritage, intangible cultural value, community rights, and statutory obligations result in a significant evidential gap. The cultural impacts of the development have not been adequately assessed, and the application does not provide a sufficient foundation for evaluating the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal under consideration is accompanied by a Social Impact Assessment commissioned by the developer, which included focus groups with local residents. However, the full report has not been published, resulting in a significant evidential gap.

This lack of transparency precludes both public understanding and the competent authority's ability to fully assess the social risks highlighted by the developer's own research.

Summaries available indicate that residents are currently experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts are based on direct engagement, not speculation. Nevertheless, the failure to disclose the complete assessment hampers the capacity for proper scrutiny and limits the determination of the significance of these findings in the decision-making process.

Evidence suggests that the proposal is perceived as a direct threat to community identity and cohesion, with "cultural loss" noted within the developer's findings. Despite these concerns, such impacts have not been sufficiently integrated into the application or given 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 further 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 compromised. The absence of the complete dataset leads to a failure in presenting a comprehensive evidential basis for weighing the benefits against the potential harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and mitigate harm; however, existing evidence points to adverse effects that remain undisclosed. Without the full assessment, it cannot be shown that the proposal complies with this policy.

The procedural ramifications are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation due to the lack of access to the complete Social Impact Assessment. This omission is material within the application and reflects a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, alongside the evidence of existing adverse impacts, results in an incomplete and unreliable assessment. This undermines the lawful determination of the application and highlights that it lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and strong sense of remoteness. The introduction of large-scale turbines near the shoreline would result in a continuous and dominant industrial presence,

fundamentally changing this unique character and leading to a permanent and irreversible transformation of the landscape.

The assessment accompanying the application inadequately captures the extent of visual change anticipated. Given the scale and proximity of the turbines, they are expected to overshadow views from residential areas, historic sites, and popular coastal locations. Such an impact would erode the essential qualities of naturalness and remoteness, yet the assessment fails to convey this level of impact or its significance within the context of such a sensitive landscape.

Concerns also arise regarding the methodology employed in selecting and presenting visual viewpoints. Evidence indicates that these viewpoints may not accurately reflect the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the magnitude of visual impact has been understated, thus compromising the reliability of the assessment.

Another significant shortcoming is the lack of consideration for the interconnected relationship between landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a wider landscape setting that is visually and spatially linked to the Atlantic horizon. The assessment treats these heritage assets as isolated, neglecting their interdependence and resulting in an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these connections, altering how heritage assets are experienced and severing their relationship with the natural horizon. This goes beyond visual impact and encompasses a broader cultural and spatial harm that has not been adequately evaluated in the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4 concerning the protection of natural places and historic assets. The magnitude of change is inconsistent with the requirement to protect landscape character, visual amenity, and the setting of culturally significant sites. Moreover, the absence of a thorough worst-case assessment further undermines any assertion of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. Given the size, height, and proximity of the turbines, their presence would be dominant and unavoidable. Consequently, 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 fails to accurately represent the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These deficiencies hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal for construction within a high-energy Atlantic environment necessitates substantial seabed preparation and installation works, yet it lacks comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. The application instead depends on the development of mitigation and contingency measures after consent has been granted, which limits any effective assessment of their potential adequacy or effectiveness.

This dependence on unspecified future measures raises significant concerns, particularly in relation to the sensitivity of the receiving environment. The West Lewis coastline is characterised by clean coastal waters and important habitats that are susceptible to disturbances from sediment and contamination. While the application acknowledges risks associated with sediment mobilisation and the possibility of accidental chemical or oil spills, it does not adequately detail preventive, control, or monitoring measures.

Moreover, there is uncertainty regarding the behaviour and scale of sediment plumes resulting from seabed disturbances and cable installation. Without robust modelling and clearly defined management strategies, assessing the extent, duration, or ecological consequences of these impacts becomes impossible. This uncertainty also pertains to the potential effects on marine species and habitats that have already been identified as sensitive in the broader context.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application obstructs the evaluation of whether sufficient safeguards are in place to address pollution incidents. This deferral introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures prior to making a determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. Significant effects and corresponding mitigation must be evaluated before consent is granted, and the absence of this information precludes a lawful determination. Furthermore, the application fails to demonstrate adherence to policy requirements concerning environmental protection and water quality.

In conclusion, the failure to define mitigation measures, the inadequacy of detailed management plans, and the uncertainty surrounding potential impacts collectively render the assessment materially deficient. These deficiencies hinder a thorough evaluation of construction and pollution risks, reinforcing the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are 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 assessment regarding onshore infrastructure is significantly deficient, failing to capture the complete range of impacts from what constitutes a single integrated project. The offshore turbines and the associated onshore works are closely interconnected; however, they have been evaluated in isolation. This fragmented assessment obscures the true extent of environmental and socio-economic consequences.

Central to the onshore elements are the proposed cabling across protected moorland, the construction of a substation near Stornoway, and the creation of access infrastructure through sensitive landscapes. These activities entail excavation in areas of deep peat, particularly in Barvas Moor, which serves as a crucial carbon store and is an ecologically sensitive habitat. Without a thorough evaluation of these effects, the project's overall environmental impact remains unclear.

Furthermore, by omitting or postponing the assessment of onshore impacts, the application undermines the ability to effectively evaluate cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively; yet, the division between offshore and onshore elements means the combined impacts on peatlands, habitats, and local communities are inadequately understood.

Significant risks to sensitive habitats, such as machair systems and peatland environments, are present and these areas are subject to policy protection. The application fails to show that these impacts have been fully evaluated or that suitable avoidance measures have been put in place, creating a noticeable evidential gap regarding biodiversity protection.

Concerns also arise surrounding carbon balance, as the disruption of peatland can release stored carbon, potentially resulting in a carbon debt that contradicts the aims of renewable energy development. The application does not sufficiently address this concern or prove that the overall carbon balance remains positive.

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

From a policy standpoint, the failure to assess the project as a cohesive whole and to adequately protect peatlands, habitats, and land use interests is inconsistent with the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be avoided or mitigated further weakens the application.

In conclusion, the separation of project components, the absence of a thorough assessment, and the lack of evidence regarding environmental and land use impacts render this portion of the application incomplete and unreliable, thus hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are a vital aspect of the area's environmental quality, cultural identity, and tourism appeal. However, the proposal introduces permanent red aviation lighting that would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment. This significant alteration is not addressed in the application, which fails to evaluate the impact of such lighting on visual amenity, landscape character, or the experiences of residents and visitors. Given the increasing importance of dark skies to the area's identity and to burgeoning sectors like astro-tourism, this omission creates a clear gap in the overall landscape and environmental assessment.

Moreover, there is no consideration of the effects on nocturnal wildlife, which is critical. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to phototaxis, a phenomenon that can lead to disorientation and heightened collision risks. The absence of a lighting impact assessment or a phototaxis study means the application neglects to evaluate how aviation lighting may affect these species or contribute to their mortality rates. Additionally, the ornithological assessment relies solely on daytime survey data, overlooking nocturnal activity and associated dangers. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this danger has not been examined. The lack of site-specific night-time data results in a critical gap in understanding the ecological impacts of the proposal.

Without a thorough assessment of these nocturnal effects, it is impossible to ascertain whether protected species or designated sites could be adversely impacted. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and hindering a lawful determination. Furthermore, the failure to address these issues conflicts with National Planning Framework 4 regarding the protection of natural places and environmental quality. It also undermines the overall evaluation of landscape and seascape impacts, as the character of night-time is an integral part of the environment.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm highlights a significant failure to meet the principles of sustainable development as defined by statutory duties and national policy. This application mirrors the critical issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was a central concern. Now, despite a policy framework that places increased emphasis on biodiversity, peatland preservation, landscape integrity, and community

welfare, the application falls short.

There are substantial gaps in the evidential basis necessary for a thorough determination. Baseline data is incomplete, the design envelope remains undefined, and there is an over-reliance on unspecified mitigation measures. Key impact pathways have been omitted, such as those concerning nocturnal wildlife, comprehensive onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is inadequate, hindering a complete understanding of potential significant effects or residual impacts.

Moreover, procedural failures are apparent. The lack of a compliant Island Communities Impact Assessment breaches the statutory obligations outlined in the Islands (Scotland) Act 2018, and the non-disclosure of the full Social Impact Assessment represents a significant omission. These shortcomings hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal directly contradicts the principles set forth in National Planning Framework 4. It does not adequately protect biodiversity, natural environments, or cultural heritage, fails to demonstrate acceptable health and wellbeing impacts, and lacks evidence of a net economic benefit due to missing tourism impact assessments. Additionally, the cumulative effects of both offshore and onshore components have not been properly evaluated, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially severe. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also inconsistent in certain areas. The necessary evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and obstructing a lawful conclusion regarding the acceptability of impacts.

The proposal would also lead to significant and irreversible alterations to a sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual relationships, and negative effects on tourism represent lasting consequences that cannot be mitigated adequately.

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

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: 5A977738

Member of the public 1213

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted in accordance with relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a review of the Environmental Impact Assessment Report and accompanying documentation, highlighting significant deficiencies in planning, environmental, cultural, and procedural areas. The proposed development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and robust cultural identity. Concerns have been raised regarding the compatibility of the proposal with statutory requirements, national policy, and the principles of sustainable development, especially in light of its scale, proximity, and design.

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

There are evident and serious policy inconsistencies with the proposal. It seems to contravene the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. Furthermore, the application does not convincingly demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly undermine the statutory tests required for consent and hinder the competent authority's ability to affirm the development's acceptability in policy terms.

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline features an open Atlantic horizon and an undeveloped character that contributes to a strong sense of remoteness. The proposed 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 causing a permanent and irreversible transformation of the landscape.

The application does not sufficiently represent the magnitude of the visual change that would occur. The scale and proximity of the turbines are such that they would dominate views from residential areas, historic sites, and widely used coastal locations. This situation would directly impact visual amenity and erode the defining qualities of naturalness and remoteness. The assessment fails to effectively convey the significance of these impacts in the context of such a sensitive landscape.

Concerns also arise regarding the selection and presentation of visual viewpoints within the assessment. Evidence suggests that the chosen viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This oversight raises the possibility that the magnitude of visual impact has been understated, thereby undermining the reliability of the assessment.

Furthermore, there is a notable deficiency in addressing the interconnected relationship between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are intrinsically linked to the wider landscape setting by visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as isolated assets rather than recognising their interdependence, leading to an incomplete evaluation of impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, particularly concerning the protection of natural places and historic assets. The extent 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 thorough worst-case assessment further calls into question any assertion of policy compliance.

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

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

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed and fails to meet the requirements for sustainable development as mandated by statutory duties, national policy, and evidential standards. This proposal echoes the core issues that resulted in the 2008 refusal of the Lewis Wind Power proposal, where the level of industrialisation was deemed unacceptable. It is now being presented under a policy framework that places heightened importance on biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant deficiencies in the evidential basis for this proposal. Critical gaps exist in baseline data, and the application relies on an undefined design envelope with unspecified mitigation measures. Key impact pathways have been omitted, including those affecting nocturnal wildlife, the full scope of onshore infrastructure, and tourism implications. Consequently, the Environmental Impact Assessment remains incomplete, hindering a comprehensive understanding of the likely significant effects and residual impacts.

Moreover, the application demonstrates clear procedural failures. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations outlined in the Islands (Scotland) Act 2018. Additionally, the failure to fully disclose the Social Impact Assessment represents a material omission that prevents the competent authority from adequately assessing impacts on community wellbeing, cultural identity, and economic resilience, thus rendering the application unfit for determination.

In terms of compliance with National Planning Framework 4, the proposal is in direct conflict. It does not adequately demonstrate the protection of biodiversity, natural environments, and cultural heritage. Furthermore, it fails to show that health and wellbeing impacts are acceptable and lacks evidence of net economic benefits, particularly due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been properly evaluated, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertainty persists regarding the environmental risks associated with this proposal. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in certain areas. The evidential threshold required to conclusively exclude adverse effects beyond reasonable scientific doubt has not been met, invoking the precautionary principle and preventing any lawful conclusion that the impacts are acceptable.

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

In summary, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, policy conflicts, and unresolved environmental risks preclude a lawful and evidence-based decision. Therefore, it is

imperative that the competent authority refuses consent for this application or invokes the appropriate regulatory measures to secure the submission of the required missing information.

A formal request is thus 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: 611B2402

Member of the public 1214

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm. The application was submitted under the marine licensing and Environmental Impact Assessment regimes. After reviewing the Environmental Impact Assessment Report and the related documentation, this objection highlights several deficiencies in 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, nearly pristine environment, and strong cultural identity. The design, scale, and proximity of the project raise significant concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks sufficient evidential support for a lawful determination. Key environmental data is absent, baseline information is inconsistent and limited, and important elements of the proposal remain undefined. The flexible design framework used in the application hampers a clear assessment of potential significant effects. Furthermore, the reliance on unspecified mitigation measures means their effectiveness cannot be evaluated. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects are not backed by solid evidence.

There are notable policy inconsistencies present. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements aimed at safeguarding biodiversity, climate concerns, and environmental integrity. Such conflicts impact the statutory tests necessary for consent and undermine the ability of the relevant authority to determine that the development aligns with policy standards.

The scale of this proposal is unprecedented in this area, with large turbines situated near the shoreline, raising significant issues regarding landscape capacity, visual dominance, and environmental effects. The combination of insufficient information, reliance on undefined mitigation measures, evidential shortcomings, and clear policy violations illustrates that the application is incomplete and cannot support a lawful determination. In light of these concerns, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species lacks completeness and reliability in its understanding of the ecological receptors within the West Lewis coastal environment, which is a biologically active and sensitive marine system. The baseline data provided is insufficient, and the methodologies employed do not adequately capture the presence, behaviour, and habitat use of various species. Consequently, the assessment fails to deliver a solid evidential basis for evaluating impacts.

One significant oversight involves otters, a species protected under European law. The application does not sufficiently acknowledge or assess their active utilisation of coastal areas for foraging and movement. The neglect of their core foraging range and behavioural patterns results in an inadequate evaluation of the potential impacts stemming from construction disturbance, noise, and increased human activity. This flaw undermines any claims regarding the absence of significant effects on otters.

Deficiencies are also apparent in the assessment of basking sharks. The reliance on aerial surveys introduces considerable detection bias, particularly under Atlantic weather conditions. This method is likely to lead to an underestimation of their presence when compared to established land-based observations that reveal frequent use of these waters. The failure to incorporate or adequately consider such data contributes to an incomplete baseline, thereby diminishing the reliability of the conclusions reached.

These methodological shortcomings mean that conclusions regarding negligible or non-significant effects are based more on assumptions than on solid evidence. The lack of adequate baseline data also obstructs a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty about the actual level of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not comply with the requirements of the Environmental Impact Assessment regime or the National Planning Framework 4. The failure to properly identify and assess protected species contributes to a level of uncertainty that prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these conditions, consent cannot be granted lawfully.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment untrustworthy. These deficiencies hinder a thorough evaluation of impacts on marine ecology and protected species, leading to the overall determination that the application lacks a sound evidential foundation.

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.

TOURISM

The assessment concerning tourism impacts associated with the proposed development is critically inadequate and neglects to evaluate the economic and social repercussions for a vital sector of the Isle of Lewis economy. The area's wild coastline,

near-pristine landscape, dark skies, and sense of remoteness are essential to tourism, which has experienced notable growth from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and constituting up to 16% of the island's economy. Although the application indicates that 86% of visitors are attracted by the scenery, it lacks a quantified assessment of how the introduction of large-scale offshore infrastructure may influence visitor numbers, behaviours, or overall economic contributions.

Furthermore, the application does not analyse how the industrialisation of the seascape and the deterioration of environmental quality could affect Tourism Gross Value Added or the broader economic resilience of the island. Without this crucial analysis, it remains unclear whether the proposed development would bring about a net economic benefit or threaten an established and growing sector. The failure to take into account the significance of environmental quality in supporting tourism, including the vital role of unspoiled landscapes and dark skies in shaping visitor experiences and the growth of nature-based and astro-tourism markets, exacerbates this issue. Additionally, the lack of a Dark Skies Assessment results in a significant gap in understanding the impacts on a recognised and expanding aspect of the local economy.

In an island community characterised by limited economic diversification, the omission of tourism impact assessments has far-reaching implications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been evaluated as required by the Islands (Scotland) Act 2018. From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly regarding economic impact and the need to illustrate net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector and fails to provide adequate evidence for competent authorities to evaluate the economic consequences of the proposal.

Collectively, the deficiencies in quantifying tourism impacts, assessing the environmental drivers of visitor behaviour, and recognising the economic dependency of the island create a substantial evidential gap. This hinders a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm is a significant failure in meeting the requirements of sustainable development as measured against statutory duties, national policy, and evidential standards. It echoes the critical concerns that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. This current application is presented under a more robust policy framework, one that places an increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

A thorough examination reveals that the application lacks a complete and dependable

evidential basis for determination. There are essential gaps in the baseline data, the design envelope remains undefined, and there is an overreliance on unspecified mitigation measures. Furthermore, it fails to address crucial impact pathways, including those affecting nocturnal wildlife, the entirety of onshore infrastructure, and the implications for tourism. Consequently, the Environmental Impact Assessment is insufficient, hindering a comprehensive understanding of potential significant effects or residual impacts.

Procedural shortcomings are evident as well. The absence of a compliant Island Communities Impact Assessment constitutes a violation of statutory duties under the Islands (Scotland) Act 2018, and the lack of a complete Social Impact Assessment is a material omission. These gaps hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application inadequate for determination.

Moreover, the proposal contradicts the National Planning Framework 4. It does not demonstrate adequate protection of biodiversity, natural environments, or cultural heritage. The proposal fails to validate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, as there has been no tourism impact modelling. The cumulative impact of both offshore and onshore components has not been adequately assessed, obscuring the potential effects on peatlands, carbon balance, habitats, and crofting land.

There are significant uncertainties regarding environmental risks, with the assessments of marine ecology, seabirds, protected species, and marine mammals being incomplete and occasionally inconsistent. The evidential threshold necessary to dismiss adverse effects beyond reasonable scientific doubt has not been satisfied, thus engaging the precautionary principle and preventing any lawful conclusion that the impacts are acceptable.

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

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

For these reasons, a formal request is made for the application for the Spiorad na Mara Offshore Wind Farm to 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: 57CE57E4

Member of the public 1215

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 relevant marine licensing and Environmental Impact Assessment frameworks. The review of the Environmental Impact Assessment Report and associated documentation has revealed significant planning, environmental, cultural, and procedural deficiencies.

The proposal is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. However, the scale and design of the proposed development pose serious questions about its alignment with statutory requirements, national policy, and sustainable development principles.

Moreover, the application lacks an adequate evidential basis necessary for lawful determination. Missing critical environmental data, inconsistent baseline information, and undefined key aspects of the proposal contribute to a significant lack of clarity. The use of a flexible design framework complicates understanding of potential significant effects, while unestablished mitigation measures leave their efficacy unassessed. Consequently, this documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, with claims of negligible effects unsupported by robust evidence.

Furthermore, there are evident policy conflicts present 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 prove that it can meet national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly undermine the statutory tests necessary for consent and hinder the competent authority's ability to determine the development's acceptability in policy terms.

Given the unprecedented scale of this proposal and the placement of large turbines close to the shoreline, significant concerns arise related to landscape capacity, visual dominance, and environmental impact. Collectively, the deficiencies in information, dependence on undefined mitigation, evidential weaknesses, and clear policy non-compliance illustrate that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle must be applied.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is significantly lacking, providing an incomplete and unreliable picture of the ecological receptors in the West Lewis coastal environment. This region is a sensitive and biologically rich marine system, yet the baseline data presented is inadequate, and the methodologies employed do not effectively capture the presence, behaviour, and habitat utilisation of species. Consequently, the evaluation fails to establish a robust evidential basis for assessing potential impacts.

A notable shortcoming is the treatment of otters, which are classified as a European Protected Species. The application neglects to properly identify and assess their active usage of coastal areas for foraging and movement. The assessment overlooks their core foraging range and behavioural patterns, leading to an insufficient evaluation of the potential impacts of construction disturbance, noise, and increased activity. This lapse undermines any findings regarding the absence of significant effects on this species.

Further, the assessment of basking sharks suffers from substantial deficiencies due to its reliance on aerial surveys, which introduce a considerable detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence, especially when compared to established land-based observations that indicate frequent use of these waters. The failure to incorporate or adequately consider such data results in an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings lead to conclusions of negligible or non-significant effects being based more on assumptions than on sound evidence. The lack of sufficient baseline data also hampers the ability to conduct a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty surrounding the actual level of risk to marine species and habitats.

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

Overall, the combination of inadequate 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 and reinforce the conclusion that the application lacks a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is significantly flawed, containing substantial gaps in evidence and inconsistencies that undermine its findings. The Isle

of Lewis's west coast is home to internationally important seabird populations that are already experiencing declines. However, the application does not adequately demonstrate that these species will remain unaffected, as required by the relevant evidential standards. The turbines are sited within vital foraging areas and migratory pathways, yet the assessment fails to thoroughly evaluate potential risks, including displacement, collision, and habitat loss.

There is a notable contradiction in the application where the developer asserts that there are no significant adverse effects, while also submitting a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises doubts about the assessment's reliability and suggests that the conclusions drawn are not substantiated by the evidence provided. Furthermore, the assessment does not convincingly show that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will be unaffected. The significance of these feeding grounds is inadequately acknowledged, and the reliance on modelling approaches adds uncertainty, particularly for species that are already in severe decline, like Kittiwakes and Fulmars. The methodologies employed may underestimate mortality rates, especially where baseline data is lacking and behavioural responses remain unclear.

The placement of turbines within a recognised migratory corridor presents an additional and serious risk, potentially obstructing a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term consequences of ongoing mortality in this corridor or the potential impacts on species with relatively small global populations.

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

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

Collectively, these issues render the assessment unreliable due to internal contradictions, methodological flaws, and a lack of sufficient evidence. These shortcomings hinder a thorough evaluation of the potential impacts and lead to the overall conclusion that the application fails to satisfy the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the cultural heritage along the West Lewis coastline is inadequate. It fails to recognise this area as a living cultural landscape, where environment, language, tradition, and community are interconnected. The application treats heritage merely as static assets, rather than acknowledging their active social, cultural, and spiritual functions within the community.

A significant issue is the handling of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are active places of burial and spiritual practice, yet they are regarded as static features in the assessment. This oversight neglects their ongoing use, significance, and the potential impact of development on their surroundings, leading to an incomplete evaluation of cultural effects and overlooking their role in community life.

Moreover, the application does not assess intangible cultural heritage, such as the Gaelic language and traditions, as well as the long-standing connection between the community and the coastal environment. These aspects are vital to the area's identity, yet they are entirely excluded from the assessment, which is a notable omission. The cultural impact of the development cannot be properly understood without considering these factors.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity, recognised as 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 fails to align with established principles of participation in decisions that affect cultural and environmental interests.

A critical failure in procedure 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 meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission prevents a lawful determination.

From a policy standpoint, these shortcomings conflict with National Planning Framework 4, especially regarding the protection of historic assets and places. The neglect to consider both tangible and intangible heritage, along with the failure to recognise living cultural practices, represents a clear deviation from policy requirements.

In summary, the lack of assessment of living heritage, intangible cultural value, community rights, and statutory obligations leads to a significant gap in evidence. The cultural impacts of the development have not been adequately evaluated, and the application does not provide a sufficient basis for understanding the true cultural cost of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

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

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4 regarding the protection of natural environments and historic assets. The extent of change proposed does not align with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertion of compliance with policy.

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal fails to provide a comprehensive assessment of construction and pollution risks, making it impossible to evaluate the likely environmental effects accurately. It involves significant seabed preparation and installation works in a high-energy Atlantic environment, yet lacks fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on undefined mitigation and contingency measures that would be prepared after consent, which undermines any meaningful assessment of their adequacy or effectiveness.

This lack of clarity is particularly alarming given the sensitive nature of the receiving environment along the West Lewis coastline, which is home to clean coastal waters and vital habitats susceptible to sediment disturbance and contamination. While the application acknowledges potential risks such as sediment mobilisation and the possibility of chemical or oil spills, it does not adequately detail how these incidents will be prevented, controlled, or monitored.

Moreover, there is uncertainty surrounding the scale and behaviour of sediment plumes resulting from the seabed disturbance and cable installation. Without robust modelling and clearly articulated management strategies, it is impossible to ascertain the extent, duration, or ecological ramifications of these impacts. This uncertainty also affects the potential consequences for marine species and habitats already recognised as sensitive in the broader assessment.

The absence of detailed emergency response procedures only exacerbates these issues. By delaying contingency planning until after consent, the application obstructs a proper evaluation of whether suitable safeguards are in place to address pollution events. This introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures before making a decision.

From a regulatory standpoint, the postponement of crucial environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be evaluated prior to consent, and without such information, a lawful determination is unattainable. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the combination of undefined mitigation measures, inadequate management plans, and uncertainty about potential impacts makes the assessment materially deficient. These deficiencies preclude a thorough evaluation of construction and pollution risks and further emphasise that the application is incomplete.

FISHERIES AND MARINE LIFE

The application does not adequately evaluate the impacts on fisheries and marine life, presenting significant risks to both the ecosystem and the local fishing industry. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing sector, yet the proposal fails to establish how these vital resources can be preserved amidst development activities without causing major disruptions.

One critical concern is the assumption that fishing activities can be relocated without any negative effects. The application lacks supporting evidence that alternative fishing grounds exist, are accessible, or can sustain the additional pressures of displaced fishing efforts. This gap in information is crucial, as it raises the possibility of overfishing in other areas, which could have broader economic ramifications for the local fishing fleet. Consequently, the impacts on fisheries and community livelihoods remain poorly understood due to this lack of a clear and evidence-based assessment.

Furthermore, the proposed development poses notable risks to marine species, especially due to the underwater noise generated during construction activities. High-energy hammer piling is anticipated to cause disturbances across extensive distances, which could adversely affect local species, including dolphins. The potential disturbance to a significant portion of the local bottlenose dolphin population is alarming, yet the application minimises these effects without adequate evidence to support such claims.

There is also a troubling inconsistency within the application regarding the necessity of licenses for actions that may harm European Protected Species. While the potential for such harm is acknowledged, impacts are simultaneously characterised as negligible. This contradiction undermines the assessment's credibility and raises serious concerns about adherence to the Habitats Regulations, particularly when harm is expected to a degree that necessitates legal authorisation.

Additionally, the assessment neglects to account for cumulative impacts that arise from multiple sources of pressure, such as habitat disruption, noise, 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 illustrate how the development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, hindering any conclusion that the proposal embodies sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents an incomplete assessment of the onshore infrastructure, failing to fully consider the impacts of what constitutes a single integrated project. The offshore turbines and onshore works are closely interconnected; however, they are evaluated separately, resulting in a fragmented analysis that obscures the true scale of

environmental and socio-economic effects.

Onshore elements involve significant interventions, including cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. These activities entail excavation through areas of deep peat, particularly within Barvas Moor, a crucial carbon store and ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, hindering a complete understanding of the overall environmental footprint of the project.

By deferring the assessment of onshore impacts, the application fails to allow for a proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all project components are considered in unison; yet, the disconnection between offshore and onshore elements leaves the combined impacts on peatlands, habitats, and local communities inadequately addressed.

There are significant risks to sensitive habitats such as machair systems and peatland environments, which are under policy protection. The application does not adequately demonstrate that the impacts on these habitats have been thoroughly assessed or that effective avoidance measures are in place, leaving an evidential gap regarding biodiversity protection.

Furthermore, the proposal raises serious concerns about carbon balance. The disturbance of peatland could release stored carbon, potentially resulting in a carbon debt that counters the aims of renewable energy development. The application does not sufficiently address this concern or prove that the overall carbon balance remains advantageous.

Moreover, the routing of infrastructure through active croft land poses potential conflicts with existing land use and legal rights. There is a lack of evidence in the application to show that the required consents or processes have been initiated, prompting questions about the project's deliverability and lawful implementation.

From a policy standpoint, the failure to evaluate the project comprehensively and demonstrate the protection of peatlands, habitats, and land use interests stands in conflict with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be 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 concerning environmental and land use impacts render this section of the application incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife constitutes a significant evidential gap in the Environmental Impact Assessment. The West Lewis

coastline is known for its exceptionally dark skies, which are crucial for maintaining environmental quality, cultural identity, and tourism value. The introduction of permanent red aviation lighting, which is visible over long distances, will create an intrusive "wall of light" effect across the western horizon and will fundamentally alter the night-time environment.

Moreover, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of residents and visitors. This is particularly significant given the value of dark skies to the area's identity and the developing tourism sector focused on astro-tourism. Consequently, the neglect of these factors creates a substantial gap in the overall landscape and environmental assessment.

Importantly, the proposal does not include any evaluation of 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 their phototactic behaviour, which can lead to disorientation and increased risk of collision. The absence of a lighting impact assessment or phototaxis study means that there has been no examination of how aviation lighting may affect these species or contribute to increased mortality rates.

The reliance on daytime survey data in the ornithological assessment fails to account for 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 vulnerability has not been evaluated. The lack of site-specific night-time data presents a critical shortfall in understanding the ecological impacts.

In the absence of an assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would be adversely affected. The evidential standard required to eliminate adverse effects beyond reasonable scientific doubt cannot be satisfied, thereby invoking the precautionary principle and obstructing a lawful determination.

From a policy standpoint, this omission contradicts National Planning Framework 4 concerning the protection of natural environments and environmental quality. It also undermines the more comprehensive assessment of landscape and seascape impacts, as the night-time character is an integral aspect of the environment.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates a significant failure to meet the criteria for sustainable development, particularly when measured against statutory duties, national policy, and evidential standards. It mirrors the issues

identified in the 2008 refusal of the Lewis Wind Power proposal, which was deemed unacceptable due to the scale of industrialisation. This current application is presented under a more rigorous policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

A critical concern is the inadequacy of the evidential basis provided for evaluation. There are notable gaps in baseline data, and the continued use of an undefined design envelope is problematic. The application relies on unspecified mitigation measures and fails to address key impact pathways, such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism. As a result, the Environmental Impact Assessment is incomplete and does not facilitate a full understanding of significant effects or residual impacts.

There are procedural shortcomings as well. The failure to include a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018. Additionally, the omission of the complete Social Impact Assessment is a significant shortcoming. These failures hinder the competent authority from adequately evaluating impacts on community wellbeing, cultural identity, and economic resilience, thus rendering the application unsuitable for determination.

The proposal contradicts the principles set out in National Planning Framework 4. It does not adequately demonstrate protection for biodiversity, natural spaces, or cultural heritage, nor does it provide evidence that health and wellbeing impacts are acceptable. Furthermore, the absence of tourism impact modelling means there is no substantiated claim of a net economic benefit. The cumulative impact of both offshore and onshore elements has not been assessed appropriately, leaving gaps in understanding the effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties and potential significance surround the environmental risks associated with this proposal. The assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The evidential standard necessary to rule out adverse effects with reasonable scientific certainty has not been achieved, thus invoking the precautionary principle and obstructing a lawful conclusion regarding the acceptability of impacts.

Moreover, the proposal would lead to profound and irreversible alterations to a delicate landscape. The industrialisation of the Atlantic-facing coastline, loss of dark skies, disruption of cultural and visual relationships, and adverse effects on tourism represent enduring impacts that cannot be adequately mitigated.

In conclusion, the combination of procedural and substantive deficiencies renders the application unfit for determination. The extensive information gaps, policy conflicts, and unresolved environmental risks preclude a lawful, evidence-based decision. Therefore, it is imperative that the competent authority either refuses consent for this application or exercises the relevant regulatory provisions to mandate the submission of the necessary information.

Consequently, it is requested that the application for the Spiorad na Mara Offshore Wind Farm be entirely 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: 71A14A83

Member of the public 1216

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

Dear Sir/Madam

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development is fundamentally flawed due to the lack of a complete and transparent assessment of social impacts, health, and wellbeing. The developer has commissioned a Social Impact Assessment that included engagement with local residents through focus groups; however, the full report has yet to be published. This significant evidential gap obstructs both public understanding and the competent authority's ability to evaluate the social risks that the developer's own research has identified.

Available summaries reveal that local residents are experiencing considerable levels of stress, anxiety, and concern stemming from the scale and proximity of the proposal. These findings are based on direct community engagement and should not be regarded as speculative. Nevertheless, the failure to disclose the complete assessment hampers thorough scrutiny of the results and hinders the capacity to appraise their significance in the decision-making framework.

Additionally, evidence points to the notion that the proposal threatens community identity and cohesion, with a recognition of "cultural loss" within the developer's findings. Despite this acknowledgment, these social impacts have not been duly incorporated into the main application nor given the necessary consideration. The withholding of the entire Social Impact Assessment obscures the true human and social cost associated with the proposed development.

This lack of transparency severely undermines the Environmental Impact Assessment process, as a comprehensive understanding of the social, economic, and health ramifications is crucial for developments of this magnitude, particularly when community character and functioning may be jeopardised. The omission of the full dataset leads to an inadequate evidential basis for weighing benefits against potential harms.

From a policy standpoint, the application does not comply with National Planning Framework 4 concerning health and wellbeing. Development initiatives are mandated to promote positive health outcomes and avert detrimental impacts; however, the evidence currently available illustrates existing adverse effects that remain undisclosed. Without the full assessment, the ability to demonstrate compliance with this policy is compromised.

The procedural implications of this situation are significant. The competent authority is unable to conduct a thorough socio-economic and health assessment without access to the full Social Impact Assessment. This represents a material omission in the application and signifies a failure to satisfy the evidential requirements under the Environmental Impact Assessment regime.

In conclusion, the non-disclosure of the complete Social Impact Assessment, along with documented evidence of current adverse impacts, renders the assessment incomplete and unreliable. This situation precludes a lawful determination and reinforces the assertion that the application lacks sufficient supporting information.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm starkly fails to meet the standards for sustainable development, as evaluated against legal obligations, national policy, and evidential criteria. This application repeats fundamental issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. It is now being submitted under a more robust policy framework, which emphasises the importance of biodiversity, peatland conservation, landscape integrity, and community wellbeing.

There are significant gaps in the evidential basis needed for a proper assessment of the application. It lacks comprehensive baseline data, continues to employ an undefined design envelope, depends on unspecified mitigation measures, and omits key impact pathways such as those concerning nocturnal wildlife, full onshore infrastructure, and tourism consequences. This results in an incomplete Environmental Impact Assessment, which fails to provide a full understanding of the likely significant effects or residual impacts.

Moreover, clear procedural shortcomings are evident. The failure to produce a compliant Island Communities Impact Assessment is a violation of statutory duties under the Islands (Scotland) Act 2018, while not disclosing the complete Social Impact Assessment amounts to a significant omission. Such shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for a lawful determination.

The proposal directly contravenes the National Planning Framework 4. It does not demonstrate adequate protection of biodiversity, natural environments, or cultural heritage, nor does it prove that health and wellbeing impacts are acceptable. Additionally, it fails to provide evidence of a net economic benefit owing to the lack of tourism impact assessments. The cumulative effects of both offshore and onshore components have not been adequately evaluated, clouding potential impacts on peatlands, carbon balance, habitats, and agricultural land.

Environmental risks associated with the project remain ambiguous and could be significantly detrimental. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, inconsistent. The application does not meet the evidential threshold necessary to confidently conclude that adverse effects can be ruled out, thereby invoking the precautionary principle, which complicates any lawful declaration of acceptable impacts.

Furthermore, the project would lead to considerable and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, and the disruption of cultural and visual connections, along with the repercussions for tourism, represent lasting effects that cannot be adequately mitigated.

In conclusion, the application is procedurally and substantively unfit for determination. The extensive information deficiencies, alongside policy conflicts and unresolved environmental risks, impede a lawful, evidence-based decision. The competent authority should refuse consent on these bases or invoke relevant regulatory provisions to obtain the required missing information. Therefore, a formal request is made for the complete refusal of the application for the Spiorad na Mara Offshore Wind Farm.

Additional Comments

The money should be kept in the Islands. If they are to be built, they should be community owned

Yours faithfully,

[Redacted]

Member of the public 1217

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, submitted under marine licensing and Environmental Impact Assessment regimes. The application is situated off the west side of the Isle of Lewis, known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Significant concerns arise from the scale, proximity, and design of the proposal regarding its compatibility with statutory requirements, national policy, and principles of sustainable development.

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

There are also evident policy conflicts. The proposal appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It fails to demonstrate compliance with national requirements intended to protect biodiversity, climate interests, and environmental integrity. These conflicts are pertinent to the statutory tests necessary for consent and undermine the capacity of the competent authority to determine the development as acceptable in policy terms.

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies that compromise its reliability and transparency regarding the proposed development's environmental effects. A flexible Project Design Envelope, lacking specific turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This uncertainty undermines the assessment's integrity, making it impossible to ascertain a

worst-case scenario, thereby hindering both public understanding and the competent authority's evaluation of the true environmental impacts.

Furthermore, the application depends on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent based on the promise of addressing environmental harm at a later stage obstructs a thorough evaluation of effectiveness and the assessment of residual impacts. This postponement of essential information contravenes the procedural integrity of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies be clearly established before any determination is made.

There are also crucial evidential shortcomings, including insufficient baseline data, methodological limitations, and the reliance on assumptions rather than site-specific evidence. Such gaps result in uncertainty regarding the scale and significance of impacts, particularly when negligible or non-significant effects are asserted without robust data to support these conclusions. This lack of adequate information hampers a clear understanding of cumulative and worst-case impacts, leading to scientific uncertainties that fail to meet statutory requirements.

Consequently, the application does not satisfy the evidential threshold set by 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 comply with National Planning Framework 4, which includes stipulations about biodiversity protection and environmental integrity, as it cannot be demonstrated that impacts have been thoroughly assessed or that suitable safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The proposal suffers from significant inadequacies in the assessment of alternatives, failing to comply with the necessary statutory requirements of the Environmental Impact Assessment regime. Instead of delivering a thorough and logical comparison of realistic alternatives based on their environmental implications, the application offers merely a narrative detailing the evolution of the project. This method does not convincingly establish that less harmful options have been effectively identified, evaluated, and chosen over more detrimental solutions.

The analysis is particularly lacking in terms of alternative offshore locations, development scales, and design configurations, which are not transparently presented or backed by evidence. Notably, the application does not prove that the developer has

genuinely evaluated the possibility of situating turbines further offshore, which would likely mitigate visual, ecological, and coastal impacts. The West Lewis coastline's sensitivity and the critical role of proximity to the shore in assessing impact make the omission of such analysis a significant flaw, preventing any assertion that the chosen site represents the least damaging option.

This lack of thorough analysis extends to the routing of cables and the assessment of landfall, where there is a notable absence of evidence indicating that alternative routes have been adequately explored to circumvent or lessen impacts on sensitive receptors, including culturally and spiritually significant locations like Barvas Cemetery. The failure to present a clear avoidance strategy, coupled with the absence of comparative analysis, suggests that there has been no application of mitigation by design, with an overreliance instead on measures to mitigate impacts post-design.

Consequently, the proposal does not demonstrate that environmental harm has been sufficiently minimised through careful site selection, layout, and routing of infrastructure. This oversight indicates a failure to adhere to the established mitigation hierarchy, impeding 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 is impossible to conclude that the proposal represents a sustainable or policy-compliant solution.

From a policy standpoint, these deficiencies fundamentally undermine adherence to National Planning Framework 4, especially concerning the protection of natural areas, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment constitutes a significant omission, contributing to the overall conclusion that the application has not been adequately evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The current application presents significant deficiencies in its assessment of marine ecology and protected species, particularly within the sensitive and biologically active marine environment of West Lewis. The methodologies employed lack the depth required to capture a comprehensive understanding of species presence, behaviour, and habitat use, leading to incomplete baseline data that undermines the reliability of the evaluation of potential impacts.

A notable gap in the assessment pertains to otters, which are classified as a European Protected Species. The application does not adequately recognise their active use of coastal areas for foraging and movement. This oversight means that critical aspects such as their core foraging range and behavioural patterns have not been appropriately considered, leaving the assessment of potential construction disturbances, noise, and increased activity unexamined. Consequently, the conclusions drawn regarding the absence of significant effects on otters are fundamentally flawed.

Further issues arise in the assessment of basking sharks, where the reliance on aerial

surveys introduces a significant detection bias, particularly in Atlantic conditions. This methodological approach risks underestimating the presence of basking sharks, especially when juxtaposed with well-established land-based observations that indicate frequent usage of these waters. The failure to incorporate or adequately consider such data culminates in an incomplete baseline, casting doubt on the reliability of the conclusions reached.

The shortcomings in methodology lead to conclusions of negligible or non-significant effects being based more on assumptions than on robust evidence. Additionally, the lack of sufficient baseline data inhibits a meaningful evaluation of cumulative and indirect impacts, which include seasonal variations and broader ecosystem interactions. This generates uncertainty about the true extent of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the criteria set out by the Environmental Impact Assessment regime and the National Planning Framework 4, given that protected species have not been sufficiently identified or assessed. The uncertainty introduced by these deficiencies precludes the dismissal of adverse effects with reasonable scientific certainty, 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 fundamentally undermines the assessment's reliability. These factors obstruct a thorough evaluation of impacts on marine ecology and protected species, reinforcing the argument that the application fails to present a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application for the development raises significant concerns regarding the reliability of its ornithological assessment, which is marked by notable gaps in evidence and inconsistencies. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already experiencing declines. However, the application does not adequately demonstrate that these species will not be adversely affected by the proposed development. The turbines are positioned within critical foraging areas and migratory routes, yet the assessment fails to sufficiently evaluate the risks associated with displacement, collision, and habitat loss.

A critical inconsistency exists in the application, as the developer asserts that there will be no significant adverse effects while also presenting a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This contradiction undermines the credibility of the assessment and suggests that its conclusions lack the necessary evidential support. Furthermore, the assessment does not convincingly demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not fully recognised, and the reliance on modelling methods introduces uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars. The

methodologies used may underestimate potential mortality rates, especially in light of incomplete baseline data and an insufficient understanding of species behaviour.

The placement of turbines within a recognized migratory corridor presents additional significant risks, effectively forming a barrier in a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not thoroughly evaluate 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 fulfil the evidential standard needed to ascertain 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 and renders a lawful conclusion in favour of consent unattainable.

Moreover, the identified deficiencies signify a failure to adhere to the National Planning Framework 4 regarding the protection of biodiversity and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will remain unaffected puts the proposal at odds with national policy.

In summary, the assessment is compromised by internal inconsistencies, methodological flaws, and insufficient evidence. These issues hinder a comprehensive evaluation of the potential impacts, leading to the conclusion that the application does not satisfy the statutory requirements essential for 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 proposed development raises significant concerns regarding social impacts, health, and wellbeing, as the assessment conducted lacks transparency and comprehensiveness. A Social Impact Assessment was commissioned by the developer, which included focus group discussions with local residents. However, the absence of the full report creates a substantial evidential gap, hindering both public understanding and the ability of the competent authority to assess the potential social risks identified through this research.

Available summaries suggest that the local residents are currently facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposed development. These reported impacts arise from direct engagement with the community, indicating that they are based on actual experiences rather than speculation. Nevertheless, the failure to publish the complete assessment prevents a thorough examination of the findings and diminishes the capacity to evaluate their significance in the decision-making process.

Furthermore, there is evidence indicating that the proposal is viewed as a direct threat to the community's identity and cohesion, with a "cultural loss" noted in the developer's own findings. Despite acknowledging these impacts, they have not been

adequately incorporated into the main application or given appropriate consideration. The withholding of the complete Social Impact Assessment obscures the genuine human and social costs associated with the development.

The lack of transparency further undermines the Environmental Impact Assessment process. An in-depth understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly when community character and functionality are at stake. By failing to provide the complete dataset, the application does not present a thorough evidential foundation for weighing benefits against potential harms.

From a policy standpoint, the application does not satisfy the requirements of National Planning Framework 4 concerning health and wellbeing. Developments should promote positive health outcomes and mitigate harm; however, the evidence currently available indicates adverse effects that have not been fully acknowledged. Without the full assessment, demonstrating compliance with this policy is not feasible.

The procedural ramifications are considerable. The competent authority cannot perform a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This omission constitutes a significant gap within the application and fails to meet the evidential standards required by the Environmental Impact Assessment framework.

Overall, the non-disclosure of the complete Social Impact Assessment, coupled with 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 underpinned by adequate information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of the potential impacts on the seascape, landscape, and visual environment is significantly lacking and does not reflect the true scale of change nor the sensitivity of the area affected. The character of the West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and strong sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the shoreline would result in a continuous and overwhelming industrial presence, fundamentally changing this character and leading to a permanent and irreversible transformation of the landscape.

Moreover, the application fails to adequately depict the extent of the anticipated visual changes. Given the scale and proximity of the turbines, they would overshadow views from residential areas, historic sites, and popular coastal locations. This would directly diminish visual amenity and compromise the essential qualities of naturalness and remoteness. The assessment does not sufficiently illustrate this impact or its significance within the context of such a sensitive landscape.

Concerns also arise from the methodology employed in the selection and presentation

of visual viewpoints. Evidence indicates that the chosen viewpoints may not accurately represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the true magnitude of the visual impact has been underestimated, casting doubt on the reliability of the assessment.

A critical shortcoming is the lack of analysis regarding the interconnected relationship between the landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting connected visually and spatially to the Atlantic horizon. The assessment fails to acknowledge their interdependence, treating these heritage sites as isolated entities, which results in an incomplete assessment 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 a visual impact along with broader cultural and spatial damage that has not been thoroughly assessed in the application.

From a policy standpoint, the proposal directly contradicts the principles outlined in National Planning Framework 4 regarding the safeguarding of natural areas and historic assets. The extent of change posed by the project is incompatible with the necessity to protect landscape character, visual amenity, and the setting of culturally significant sites. The lack of a comprehensive worst-case scenario assessment further undermines any assertion of policy conformity.

It is evident that the impacts identified cannot be suitably mitigated. Due to the scale, height, and proximity of the turbines, their presence would be prominent and unavoidable. Thus, the resulting change is fundamental and permanent, incapable of being diminished to an acceptable level through any form of mitigation.

Collectively, the assessment inadequately represents the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings obstruct a reliable evaluation and reinforce the conclusion that the proposal is at odds 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. However, the assessment of construction and pollution risks is incomplete and lacks the necessary detail to evaluate the likely environmental effects. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans provided with the application. Instead, it relies on mitigation and contingency measures that are to be prepared post-consent, which prevents any meaningful assessment of their adequacy or effectiveness.

The sensitivity of the receiving environment raises further concerns. The West Lewis coastline is known for its clean coastal waters and important habitats that are vulnerable to disturbance and contamination from sediment. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it does not sufficiently detail how these risks will be prevented, controlled, or monitored.

Additionally, there is uncertainty regarding 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 determine the extent, duration, or ecological effects of these impacts. This uncertainty also extends to potential effects on marine species and habitats already identified as sensitive in the wider assessment.

The absence of detailed emergency response procedures further exacerbates these issues. By deferring contingency planning until after consent, the application undermines the ability to evaluate whether appropriate safeguards are in place to respond to pollution events, introducing procedural risk that hinders 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 of the Environmental Impact Assessment regime. Significant effects and mitigation must be assessed prior to consent, and without this information, a lawful determination cannot be made. The application also fails to demonstrate compliance with policy requirements related to environmental protection and water quality.

Overall, the lack of defined mitigation measures, absence of detailed management plans, and uncertainty surrounding potential impacts lead to a materially deficient assessment. These shortcomings hinder a robust evaluation of construction and pollution risks and further reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application proposes development that raises significant concerns regarding its effects on fisheries and marine life. The waters off the West Lewis coast are known for both a diverse marine ecosystem and an active fishing industry, yet the proposal does not adequately demonstrate how these vital uses and habitats will be protected or maintained without causing substantial disruption.

A critical concern lies in the assumption that fishing activities can be displaced without any adverse effects. The application lacks evidence to confirm that alternative fishing grounds are available, accessible, or capable of absorbing the additional pressure that would result from such displacement. This absence of information is important, as it risks potential overfishing in other areas and could have wider economic repercussions for the local fishing fleet. Without a robust and evidence-based assessment, the

potential impacts on fisheries and local livelihoods remain unclear.

Furthermore, the proposal introduces significant risks to marine species, particularly due to the underwater noise generated during construction activities. The use of high-energy hammer piling over an extended duration is expected to create disturbances over large areas, negatively affecting species like dolphins. The anticipated impact on a considerable portion of the local bottlenose dolphin population raises substantial concerns, yet the application downplays these effects without adequate supporting evidence.

The application exhibits a noticeable inconsistency where the need for licences to permit harm to European Protected Species is recognised, while simultaneously characterising those impacts as negligible. This contradiction undermines the credibility of the assessment and raises questions about its compliance with the Habitats Regulations, especially where harm is anticipated to a level that requires legal authorisation.

In addition, the assessment neglects to consider cumulative impacts resulting from multiple pressures such as habitat disturbance, noise, 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 proposal 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 existing marine users or mitigate unacceptable impacts on marine biodiversity, which prevents any determination that the proposal constitutes sustainable development.

Overall, the deficiencies related to evidence on fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the assessment contribute to its incompleteness and unreliability. These shortcomings hinder a thorough evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal involves an integrated project that includes both offshore turbines and onshore infrastructure. However, the assessment of the onshore elements is incomplete, failing to consider the full extent of the impacts. This separation of the offshore and onshore components results in a fragmented approach that obscures the true scale of environmental and socio-economic effects.

The onshore works include cabling across protected moorland, the construction of a substation near Stornoway, and the necessary access infrastructure through sensitive landscapes. These activities entail excavation in areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and ecologically sensitive habitat. Without a comprehensive evaluation of these impacts, there is a lack of understanding regarding the project’s overall environmental footprint.

By not fully assessing onshore impacts, the application fails to facilitate an accurate evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all project components must be considered together, yet the current division between offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities are not thoroughly understood.

There are considerable risks to sensitive habitats, including machair systems and peatland environments, which are protected by policy. The application does not sufficiently demonstrate that impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been implemented. This creates a significant evidential gap concerning biodiversity protection.

Furthermore, the proposal raises concerns about carbon balance. Disturbance of the peatland can release stored carbon, potentially leading to a carbon debt that contradicts the goals of renewable energy development. The application fails to adequately address this matter or to show that the overall carbon balance remains beneficial.

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

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

In summary, the separation of project components, the lack of comprehensive assessment, and insufficient 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 absence of an assessment of dark skies and nocturnal wildlife represents a significant gap in the Environmental Impact Assessment. The coastline of West Lewis is known for its exceptionally dark skies, which are vital for environmental quality, cultural identity, and tourism. The introduction of permanent red aviation lighting would create a continuous and intrusive "wall of light" across the western horizon, fundamentally changing the night-time environment.

The application fails to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of residents and visitors. This is particularly important given the relevance of dark skies to the area’s identity and the growth of sectors such as astro-tourism. The lack of consideration for these impacts highlights a major deficiency

in the overall landscape and environmental assessment.

Additionally, there is no analysis of the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be sensitive to artificial lighting, which can cause disorientation and increase the risk of collision. The application does not provide a lighting impact assessment or a study on phototaxis, leaving a crucial gap in understanding how aviation lighting might impact these species and their mortality rates.

The reliance on daytime survey data in the ornithological assessment further complicates the issue, as it does not account for nocturnal activity or associated risks. Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this risk remains unexamined. The lack of specific night-time data is a critical oversight in understanding ecological impacts.

Without assessing nocturnal impacts, it cannot be determined whether protected species or designated sites might be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and hindering a lawful decision.

From a policy standpoint, this omission conflicts with National Planning Framework 4 regarding the protection of natural places and environmental quality. It also detracts from the broader evaluation of landscape and seascape impacts, as the character of night-time is an integral element of the environment.

In summary, the lack of an assessment of dark skies and nocturnal wildlife creates a substantial evidential gap. The absence of baseline data, impact modelling, and species-specific analysis renders the application incomplete and unsuitable for a lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements for sustainable development in light of statutory duties, national policy, and evidential standards. It echoes the main issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. Despite being presented under a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application falls short.

A complete and reliable evidential basis for determination is lacking. There are significant gaps in baseline data, the use of an undefined design envelope persists, and the mitigation measures proposed are not clearly specified. Additionally, critical impact pathways, such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism, have been omitted. As a result, the Environmental Impact Assessment is incomplete, hindering a full understanding of the likely significant effects or residual impacts.

Procedural failures are evident in the application as well. The lack of a compliant Island Communities Impact Assessment breaches statutory duties as outlined in the Islands (Scotland) Act 2018. Furthermore, the non-disclosure of the full Social Impact Assessment is a material omission. These deficiencies inhibit the competent authority from adequately assessing impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

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

Environmental risks remain uncertain and may be significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in certain areas, inconsistent. The evidential threshold necessary to demonstrate the absence of 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.

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

In conclusion, the application is unfit for determination both procedurally and substantively. The considerable information deficiencies, alongside policy conflicts and unresolved environmental risks, impede a lawful and evidence-based decision. Therefore, the competent authority is urged to refuse consent on these grounds or to invoke the necessary regulatory provisions to obtain the missing information.

A formal request is made for the application for the Spiorad na Mara Offshore Wind Farm to be refused in its entirety.

Yours faithfully,

[Redacted]

Member of the public 1218

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.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally inadequate and fails to deliver a comprehensive, transparent, and trustworthy evaluation of the potential environmental consequences of the proposal. The adoption of a flexible Project Design Envelope, which lacks commitments to specific turbine sizes, layouts, or configurations, introduces considerable uncertainty and obstructs the consistent application of a worst-case scenario. This situation compromises the assessment's integrity, making it difficult for both the public and the competent authority to grasp the true extent of environmental impacts.

The application is heavily reliant on mitigation measures, monitoring strategies, and management plans that remain undefined. Consequently, consent is being requested with the expectation that environmental harm will be managed at a later stage. This approach hinders a meaningful evaluation of the measures' effectiveness and the assessment of residual impacts. Such deferral of critical information to post-consent phases is procedurally unacceptable and contravenes the objectives of the Environmental Impact Assessment framework, which necessitates that likely significant effects and mitigation strategies are clearly established before any determination.

Moreover, there are notable evidential shortcomings, such as gaps in baseline data, methodological limitations, and the use of assumptions rather than site-specific evidence. These issues create uncertainty regarding the magnitude and significance of impacts, especially where conclusions of negligible or non-significant effects are made without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that is incompatible with statutory requirements.

As a result, the application does not meet the evidential threshold set by the Habitats Regulations, failing to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, especially regarding biodiversity protection and environmental integrity, as it cannot be shown that impacts have been thoroughly assessed or that proper safeguards are in place.

In summary, the dependence on an undefined design envelope, the lack of specified mitigation measures, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings hinder a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make a decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The deficiencies in the assessment of alternatives are significant and warrant immediate attention. The application fails to meet the statutory requirements of the Environmental Impact Assessment regime, lacking a structured and reasoned comparison of viable alternatives based on their environmental impacts. Instead, it

merely presents a narrative of project evolution, neglecting to demonstrate that less harmful options have been properly identified, assessed, and chosen over more damaging solutions.

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

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

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

From a policy standpoint, these deficiencies undermine adherence to National Planning Framework 4, particularly regarding the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a material omission that contributes to the conclusion that the application has not been sufficiently evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species in the application is insufficient, leading to an incomplete understanding of ecological receptors in the West Lewis coastal area. This marine environment is known for its sensitivity and biological activity, yet the baseline data provided is inadequate, and the methods employed do not sufficiently identify species presence, behaviour, or habitat utilisation. Consequently, the assessment lacks a reliable evidential foundation for determining potential impacts.

One critical area of concern is the failure to adequately assess otters, which are classified as a European Protected Species. The application does not sufficiently acknowledge their active use of coastal regions for foraging and movement. This oversight neglects their core foraging range and behavioural characteristics, leading to

an inadequate evaluation of the impacts arising from construction disturbances, noise, and heightened activity. Such omissions undermine any assertions about the absence of significant effects on otters.

Moreover, the assessment of basking sharks is flawed due to an over-reliance on aerial surveys that may introduce significant detection bias, particularly under Atlantic conditions. This methodology likely underrepresents the presence of basking sharks when compared to established land-based observations, which indicate their frequent usage of these waters. By failing to integrate or adequately consider this data, the assessment presents an incomplete baseline that diminishes the validity of its conclusions.

These methodological shortcomings result in the assessment's conclusions of negligible or non-significant effects being based more on assumptions than on substantiated evidence. The lack of adequate baseline data inhibits a thorough evaluation of cumulative and indirect impacts, including seasonal changes and broader ecosystem interactions. This uncertainty casts doubt on the true extent of risks posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the standards set by the Environmental Impact Assessment framework and the National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainty introduced by these deficiencies precludes a definitive conclusion regarding the absence of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these conditions, the granting of consent would not be legally justified.

In conclusion, the combination of incomplete baseline data, flawed methodologies, and conclusions that lack support renders the assessment unreliable. These inadequacies hinder a comprehensive evaluation of impacts on marine ecology and protected species, affirming that the application does not possess a sufficient evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the ornithological impacts associated with this development is fundamentally flawed. There are significant gaps in the evidence provided, as well as internal inconsistencies that undermine the validity of its conclusions. The proposal is situated within key foraging areas and migratory pathways along the west coast of the Isle of Lewis, which supports internationally important seabird populations that are already in decline. However, the application does not adequately demonstrate that these species will not be adversely affected.

A notable contradiction within the application arises from the developer's conclusion of no significant adverse effects, while simultaneously putting forth a Habitats Regulations derogation case. This derogation is only necessary when significant harm is anticipated, raising questions about the reliability of the assessment and suggesting that its conclusions lack robust evidence. Furthermore, the assessment fails to

adequately establish that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unharmed. The crucial feeding grounds associated with these species are not fully taken into account, and the reliance on modelling approaches introduces additional uncertainty, particularly concerning species that are severely declining, such as Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, especially in instances where baseline data is incomplete and the behavioural responses of the birds are not thoroughly understood.

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

From a regulatory standpoint, the application fails to meet the evidential standards needed to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, along with gaps in data and limitations in modelling, indicates that the requisite standard of beyond reasonable scientific doubt has not been attained. This situation engages the precautionary principle and obstructs a lawful conclusion that would support consent.

Additionally, the deficiencies identified suggest a non-compliance with the National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to prove that internationally important seabird populations will not be negatively affected places the proposal at odds with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage is fundamentally flawed, as it overlooks the West Lewis coastline as a dynamic cultural landscape wherein environment, language, tradition, and community are deeply intertwined. The approach taken in the application is overly simplistic, viewing heritage merely as isolated, static features rather than recognising their ongoing social, cultural, and spiritual significance within the community.

A major shortcoming is the handling of sites with cultural importance, including the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for burial and spiritual practices; however, the assessment inaccurately categorises them as static elements. This failure to acknowledge their continued use, significance, and the potential impacts of development on their context leads to an incomplete understanding of cultural effects and ignores their integral role in community life.

The assessment further neglects the intangible aspects of cultural heritage, such as the Gaelic language, local traditions, and the enduring connection between the community and the coastal environment. These elements are vital to the area's identity yet are entirely omitted from the evaluation, resulting in a significant gap. Without addressing these aspects, a comprehensive understanding of the cultural impact of the proposed development is unattainable.

Concerns also arise regarding the rights and engagement of the community. The Gaelic-speaking population, which embodies a unique cultural identity characteristic of an Indigenous People, has not been afforded the process of Free, Prior and Informed Consent. This lack of meaningful involvement undermines the credibility of the assessment and fails to adhere to established principles of participatory decision-making related to cultural and environmental interests.

A critical procedural oversight is the failure to complete a compliant Island Communities Impact Assessment, mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligation to scrutinise the social, cultural, and economic effects on the island community. This omission is significant and precludes a lawful determination of the application.

From a policy standpoint, these deficiencies create a direct conflict with the National Planning Framework 4, particularly regarding the safeguarding of historic assets and locations. The neglect of both tangible and intangible heritage, alongside the disregard for living cultural practices, constitutes a clear departure from policy expectations.

In summary, the collective failure to evaluate living heritage, intangible cultural values, community rights, and statutory requirements results in a considerable evidential void. The cultural impacts of the proposed development have not been adequately assessed, rendering the application insufficient for ascertaining the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The failure to publish the full Social Impact Assessment significantly undermines the transparency necessary for a lawful evaluation of the proposed development. Although the developer engaged local residents through focus groups as part of the Social Impact Assessment, the absence of the complete report creates a substantial evidential gap. This gap hinders both public understanding and the competent authority's ability to assess the social risks identified through the developer’s own research.

Available summaries reveal that residents are currently experiencing measurable levels of stress, anxiety, and concern regarding the scale and proximity of the proposal. These impacts are based on direct engagement, thus are not speculative. However, without access to the full assessment, there is an impediment to scrutinising the findings thoroughly, which in turn restricts the ability to evaluate their significance within the decision-making framework.

Furthermore, the proposal is seen as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite these implications, they have not been adequately addressed within the main application or given the necessary weight in the evaluation process. The retention of the full Social Impact Assessment clouds the true human and social costs associated with the development.

This lack of transparency not only affects the Social Impact Assessment but also undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health implications is crucial for developments of this magnitude, especially when community character and functionality are at stake. The failure to provide the complete dataset means that the application does not offer a full evidential basis to assess the balance of benefits against harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Developments are required to foster positive health outcomes and mitigate harm, yet the existing evidence indicates adverse effects that have not been fully acknowledged. Without the full assessment, compliance with this policy cannot be verified.

The procedural ramifications are notable. The competent authority is unable to conduct a thorough socio-economic and health evaluation due to the unavailability of the complete Social Impact Assessment. This deficiency constitutes a material omission in the application, failing to satisfy the evidential obligations of the Environmental Impact Assessment regime.

Overall, the non-disclosure of the complete Social Impact Assessment, combined with the documented evidence of existing adverse impacts, renders the assessment both incomplete and unreliable. This situation obstructs a lawful determination and reaffirms the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal to introduce large-scale turbines near the West Lewis coastline presents immediate and serious risks to both the environment and cultural heritage. This region is characterised by its open Atlantic horizon, undeveloped landscape, and a profound sense of remoteness. The placement of turbines in such proximity to the shoreline would create a persistent industrial presence, fundamentally transforming the landscape in a permanent and irreversible manner.

The assessment of visual impacts associated with this development is critically flawed, failing to convey the full extent of the proposed changes. The size and location of the turbines would lead to their dominance in views from residential areas, historic sites, and popular coastal locations. Consequently, this would severely diminish visual amenity and undermine the essential qualities of naturalness and remoteness. The lack of an adequate representation of this impact, particularly within such a delicate

landscape, is deeply concerning.

Moreover, there are significant methodological shortcomings regarding the selection and presentation of visual viewpoints. Current evidence indicates that the chosen viewpoints do not effectively encompass the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and valued landscapes. This raises the possibility that the visual impact has been underestimated, thus compromising the overall reliability of the assessment.

Additionally, the evaluation fails to address the intricate relationships between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are interlinked with the wider landscape, sharing visual and spatial connections with the Atlantic horizon. By treating these heritage assets as isolated elements, the assessment neglects their interdependence, resulting in an incomplete understanding of their settings 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 is not only a matter of visual intrusion but also signifies broader cultural and spatial harm that has not been sufficiently assessed in the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, which mandates the protection of natural environments and historic sites. The anticipated changes are at odds with the need to preserve landscape character, visual amenity, and the context of culturally significant locations. The lack of a comprehensive worst-case assessment further weakens any assertions of compliance with policy requirements.

It is evident that the impacts identified are not capable of effective mitigation. Given the scale, height, and proximity of the turbines, their presence would be unavoidable and overwhelmingly dominant. The resulting changes are thus fundamental and permanent, incapable of being reduced to an acceptable level through mitigation strategies.

In summary, the assessment inadequately represents the scale of impact, the environmental sensitivity, and the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this important landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal raises immediate concerns due to the absence of comprehensive assessment regarding construction and pollution risks. It involves significant seabed preparation and installation activities in a challenging Atlantic environment, yet lacks fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on future mitigation and contingency measures that will be established after consent, hindering any effective evaluation of their sufficiency or reliability.

This reliance on undefined future measures is particularly alarming given the sensitivity of the West Lewis coastline, which supports clean coastal waters and critical habitats susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it fails to offer adequate detail on the preventive, control, or monitoring strategies that will be employed.

Furthermore, there is considerable uncertainty concerning the scale and dynamics of sediment plumes generated from seabed disturbances and cable installations. Without robust modelling and well-defined management strategies, it becomes impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty is further compounded by potential effects on marine species and habitats that have already been identified as sensitive within the wider assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent stage, the application undermines the ability to determine whether suitable safeguards are in place to address pollution events. This not only introduces procedural risk but also diminishes the competent authority's capacity to evaluate environmental protection measures at the determination stage.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the mandates of the Environmental Impact Assessment regime. Significant effects and necessary mitigation must be reviewed prior to consent, and the absence of such critical information obstructs a lawful determination. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the lack of defined mitigation measures, insufficient management plans, and uncertainty about potential impacts create a materially deficient assessment. These deficiencies impede a thorough evaluation of construction and pollution risks, reinforcing the argument that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment of marine life and fisheries related to the application is inadequate and lacks a thorough evaluation of both ecological and socio-economic impacts. The coastal waters off West Lewis are home to a vibrant marine ecosystem and an active fishing industry. However, the proposal does not adequately address how these vital uses and habitats will be preserved or sustained without substantial disruption.

A critical concern lies in the flawed assumption that fishing activities can be relocated without significant repercussions. The application fails to provide evidence that alternative fishing grounds exist, are accessible, or can sustain the additional pressure that displacement would entail. This gap in information is crucial, as it poses risks of overfishing in other areas and could have broader economic ramifications for the local

fishing fleet. In the absence of a clear, evidence-based assessment, understanding the implications for fisheries and local livelihoods remains impossible.

Furthermore, the proposal poses considerable risks to marine species, primarily due to the underwater noise produced during construction. The use of high-energy hammer piling over an extended duration is expected to create disturbances across considerable distances, negatively impacting species such as dolphins. The anticipated disturbance to a large portion of the local bottlenose dolphin population is particularly alarming. Yet, the application minimises these potential effects and does not provide adequate evidence to support such downplaying.

There is also a troubling inconsistency within the application, where the necessity for licences to allow harm to European Protected Species is recognised, while simultaneously describing the impacts as negligible. This contradiction calls into question the validity of the assessment and raises issues concerning adherence to the Habitats Regulations, especially when harm is expected to a level that would require legal clearance.

Additionally, the assessment neglects to address the cumulative impacts that arise from various pressures, such as 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 consequences for marine ecosystems and socio-economic conditions.

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

In summary, the shortcomings related to evidence on fishing displacement, the minimisation of acoustic impacts, and the inconsistencies within the application render the assessment both incomplete and unreliable. These inadequacies impede a thorough understanding of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The onshore elements of this project include cabling across protected moorland, the construction of a substation near Stornoway, and associated access infrastructure through sensitive landscapes. These works involve excavation in areas of deep peat, particularly within Barvas Moor, which is an important carbon store and an ecologically sensitive habitat. The application fails to provide a comprehensive assessment of the impacts, which limits understanding of the project's overall environmental footprint.

The assessment of onshore infrastructure is materially incomplete. The offshore turbines and onshore works are intrinsically linked but are being assessed separately. This fragmented approach obscures the true scale of environmental and socio-

economic effects. By excluding or deferring the assessment of onshore impacts, the application obstructs a proper evaluation of cumulative effects. All components of a project should be considered together, yet the separation means that combined impacts on peatlands, habitats, and communities are not fully understood.

Significant risks to sensitive habitats, including machair systems and peatland environments, exist, and these habitats are subject to policy protection. The application does not demonstrate that the impacts on these habitats have been fully assessed or that appropriate avoidance measures have been implemented. This represents a clear evidential gap regarding biodiversity protection.

There are also concerns about carbon balance. Disturbing peatland can release stored carbon, potentially creating a carbon debt that contradicts the aims of renewable energy development. The application does not adequately address this issue or prove that the overall carbon balance remains beneficial.

Moreover, routing infrastructure through active croft land could lead to conflicts with existing land use and legal rights. The application does not provide evidence that the necessary consents or processes have been initiated, which raises doubts about 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 goes against 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 make this part of the application incomplete and unreliable, which prevents a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment fails to address the assessment of dark skies and nocturnal wildlife, which is a significant oversight. The West Lewis coastline is known for its exceptionally dark skies, crucial for environmental quality, cultural identity, and tourism, particularly in the context of emerging sectors like astro-tourism. The proposed project introduces permanent red aviation lighting that would be visible over long distances, creating an intrusive “wall of light” effect on the western horizon that would drastically change the night-time environment.

The application does not evaluate the effects of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors, despite the critical nature of dark skies to the area’s identity. This failure represents a notable gap in the overall landscape and environmental assessment.

Moreover, there is a lack of evaluation concerning 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 their phototaxis, which can result in disorientation and a heightened risk of collision. The absence of a lighting impact assessment or phototaxis study means that potential effects on these species and their mortality rates have not been assessed.

This issue is further exacerbated by reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal activity or the associated risks. For example, Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting; however, this risk has not been evaluated. The lack of site-specific night-time data creates a serious gap in understanding the ecological impacts.

Without a proper assessment of nocturnal effects, it is impossible to ascertain whether protected species or designated sites may be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, which engages the precautionary principle and hinders a lawful determination.

From a policy perspective, this omission contradicts National Planning Framework 4 concerning the protection of natural places and environmental quality. Additionally, it diminishes the overall assessment of landscape and seascape impacts, as the character of night-time environments is an essential part of the ecosystem.

Overall, the lack of evaluation concerning dark skies and nocturnal wildlife presents a considerable evidential gap. The absence of baseline data, impact modelling, and species-specific analysis renders the application incomplete and unable to support a lawful determination.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the requirements for sustainable development when evaluated against statutory duties and national policy. The concerns raised are similar to those that led to the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. The current application, while submitted under a more robust policy framework, still lacks necessary considerations for biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant shortcomings in the evidential basis for this proposal. It fails to provide reliable baseline data, relies on an undefined design envelope, and does not specify its mitigation measures. Critical pathways of impact, including effects on nocturnal wildlife, onshore infrastructure, and tourism, have been overlooked. This renders the Environmental Impact Assessment incomplete, hindering an understanding of potential significant effects or residual impacts.

Procedural shortcomings are evident as well. The lack of a compliant Island Communities Impact Assessment breaches the Islands (Scotland) Act 2018, while the

incomplete Social Impact Assessment constitutes a serious omission. These failures hinder a proper assessment of impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

The proposal contradicts the National Planning Framework 4. It does not adequately demonstrate protection of biodiversity, natural spaces, and cultural heritage. Additionally, it fails to show acceptable health and wellbeing impacts, and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative impacts of both offshore and onshore components have not been assessed appropriately, leading to obscured effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties regarding environmental risks remain significant. Incomplete assessments of marine ecology, seabirds, protected species, and marine mammals raise concerns. The necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been reached, engaging the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

In summary, this application is 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 refuse consent or require the submission of the missing information.

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

Additional Comments

This is of no benefit to the island. Years of upheaval for community's in Lewis

Yours faithfully,

[Redacted]