Member of the public 1335

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

Dear Sir/Madam

This representation constitutes a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The scale of the proposal is unprecedented in this location, with large turbines positioned in close proximity to the shoreline, which raises significant concerns regarding landscape capacity, visual dominance, and environmental impact. The development is located off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

The application fails to provide an adequate evidential basis for a lawful determination. Critical environmental data is missing, baseline information is limited and inconsistent, and key aspects of the proposal remain undefined. The reliance on a flexible design framework inhibits a clear understanding of likely significant effects, while the use of unspecified mitigation measures means their effectiveness cannot be assessed. Consequently, the documentation does not enable a full or informed understanding of environmental, cultural, or community impacts, and claims of negligible or non-significant effects are not supported by robust evidence.

There are clear and substantive policy conflicts associated with this proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate that national requirements to protect biodiversity, climate interests, and environmental integrity can be met. These conflicts directly relate to the statutory tests required for consent and undermine the capacity of the competent authority to conclude that the development is acceptable in policy terms.

Taken together, the absence of sufficient information, reliance on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance illustrate that the application is incomplete and cannot support a lawful determination. In these circumstances, it is imperative that the precautionary principle applies.

CONSTRUCTION AND POLLUTION RISKS

The evaluation of construction and pollution risks is significantly lacking, which hampers the ability to assess the likely environmental impacts. The proposal involves considerable seabed preparation and installation activities within a dynamic Atlantic environment, yet it does not include comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application relies on mitigation and contingency measures that are to be developed after consent, which

obstructs any meaningful assessment of their effectiveness or adequacy.

This dependence on unspecified future measures raises alarms given the delicate nature of the surrounding environment. The West Lewis coastline is home to pristine coastal waters and crucial habitats that are at risk from sediment disruption and contamination. While the application acknowledges potential hazards, including sediment mobilisation and accidental spills of chemicals or oil, it lacks sufficient detail on how such incidents will be prevented, managed, or monitored.

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

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a stage after consent, the application undermines the ability to evaluate whether adequate safeguards exist to address pollution events. This creates procedural risks and diminishes the capacity of the competent authority to properly assess environmental protection measures during the decision-making process.

From a regulatory standpoint, the postponement of critical environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. It is imperative that significant effects and mitigation strategies are evaluated prior to consent; without this information, a lawful determination cannot be reached. Additionally, the application fails to illustrate adherence to policy requirements concerning environmental protection and water quality.

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

TOURISM

The application does not adequately assess the potential impacts on tourism, which is a critical component of the Isle of Lewis economy. Tourism relies heavily on the region's unspoiled coastline, beautiful landscapes, dark skies, and a sense of isolation. While it is noted that 86% of visitors are attracted by the scenic beauty, the application fails to provide a quantitative analysis of how large-scale offshore infrastructure might influence visitor numbers, their behaviour, or the overall economic contribution of tourism.

The tourism sector has experienced considerable growth, rising from £65 million in

2017 to over £81.5 million, generating over 1,000 jobs and constituting up to 16% of the island's economy. Nevertheless, the application lacks a model to evaluate how the industrialisation of the seascape and the deterioration of environmental quality could impact the Tourism Gross Value Added and the broader economic resilience of the island. Without this analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or detract from a vital and expanding sector.

Moreover, the importance of environmental quality in attracting tourists has been overlooked. The significance of untouched landscapes and dark skies to visitor experiences, as well as the potential for emerging markets like nature-based tourism and astro-tourism, is inadequately addressed. The lack of a Dark Skies Assessment exacerbates this shortfall, resulting in a substantial gap in understanding the potential impacts on this recognised and growing facet of the local economy.

For an island community with limited economic diversification, the omission of a tourism impact assessment raises broader concerns about employment, local enterprises, and community sustainability. The absence of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been evaluated in accordance with the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4, particularly regarding economic impact and the necessity to illustrate a net benefit. It contradicts strategic goals that prioritise tourism as a growth sector and lacks sufficient evidence for the competent authority to evaluate the economic ramifications of the proposal.

In summary, the collective failure to quantify tourism impacts, assess the environmental factors that drive visitor behaviour, and consider the island's economic dependency results in a significant evidential gap. This deficiency hampers a thorough evaluation of the economic effects and reinforces the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the requirements of sustainable development according to statutory duties, national policy, and evidential standards. The application reiterates the main issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. It is now submitted under a more rigorous policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant gaps in the evidential basis for determining the application. It lacks complete baseline data, utilises an undefined design envelope, depends on unspecified mitigation measures, and overlooks important impact pathways such as nocturnal wildlife, full onshore infrastructure, and the effects on tourism.

Consequently, the Environmental Impact Assessment is inadequate, failing to provide a thorough understanding of potential significant effects or residual impacts.

Moreover, procedural shortcomings are evident. The lack of a compliant Island Communities Impact Assessment breaches statutory duty under the Islands (Scotland) Act 2018, while the omission of the full Social Impact Assessment represents a significant gap. These failures 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 contradicts National Planning Framework 4, as it does not adequately demonstrate protection of biodiversity, natural areas, and cultural heritage. It fails to show that health and wellbeing impacts are acceptable and cannot provide evidence of a net economic benefit due to the lack of tourism impact modelling. Furthermore, the cumulative effects of both offshore and onshore components have not been properly assessed, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

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

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

In summary, the application is both procedurally and substantively unfit for determination. The considerable deficiencies in information, alongside policy conflicts and unresolved environmental risks, impede a lawful and evidence-based decision. The competent authority should refuse consent based on these grounds or invoke relevant regulatory provisions to mandate 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 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: 62488DF8

Member of the public 1336

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, submitted in accordance with the relevant marine licensing and Environmental Impact Assessment processes. A careful review of the Environmental Impact Assessment Report and accompanying documents reveals significant deficiencies across planning, environmental, cultural, and procedural aspects. Located off the west side of the Isle of Lewis, this area is characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The scale and design of the proposal, combined with its proximity to the shoreline, lead to serious concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks an adequate evidential basis required for a lawful determination. There are critical gaps in environmental data, with limited and inconsistent baseline information, leaving many key aspects of the proposal undefined. The flexible design framework employed means that the potential significant effects cannot be clearly understood, while the reliance on unspecified mitigation measures prevents an assessment of their effectiveness. Consequently, the documents fail to provide a comprehensive understanding of the environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects are unsupported by robust evidence.

In addition, there are significant policy conflicts evident within the proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly concerning biodiversity, natural habitats, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests necessary for consent and weaken the competent authority's ability to determine the proposal as acceptable from a policy standpoint.

The unprecedented scale of the proposed wind farm, with large turbines situated close to the shoreline, raises serious issues relating to landscape capacity, visual impact, and overall environmental consequences. Collectively, the insufficiency of information, reliance on undefined mitigation, evidential weaknesses, and clear non-compliance with policy illustrate that the application is incomplete and unfit for lawful determination. In light of these circumstances, it is essential that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application is fundamentally flawed, as it heavily relies on mitigation measures, monitoring strategies, and management plans that are yet to be defined. Seeking consent on the premise that environmental harm will be managed later undermines the ability to evaluate the effectiveness of these measures or to assess the residual impacts of the proposal. This postponement of crucial information until after consent is granted is not only procedurally unacceptable but also runs counter to the purpose of the Environmental Impact Assessment regime, which mandates that significant effects and their mitigations should be established clearly before any determination.

Additionally, the Environmental Impact Assessment Report is materially deficient and fails to present a full, transparent, or reliable account of the potential environmental effects of the proposal. The introduction of a flexible Project Design Envelope, without specific commitments to turbine dimensions, layouts, or configurations, adds substantial uncertainty. This lack of specificity hinders a consistent assessment of a worst-case scenario, thereby undermining the integrity of the evaluation process. As a result, the impacts outlined may not accurately reflect the actual development that would be constructed, leaving both the public and the competent authority in the dark regarding the true extent of the environmental effects.

There are also significant evidential deficiencies present, including gaps in baseline data and methodological limitations, which lead to a reliance on assumptions rather than site-specific evidence. Such shortcomings create uncertainty surrounding the scale and significance of the impacts, especially where conclusions of negligible or non-significant effects are drawn without robust supporting data. The inadequate information provided prevents a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that is incompatible with statutory requirements.

Due to these deficiencies, the application does not meet the evidential threshold required under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. The precautionary principle must be applied, especially concerning protected species and sensitive habitats. Furthermore, 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 suitable safeguards are established.

In summary, the combination of an undefined design envelope, the absence of specified mitigation strategies, and the gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These inadequacies preclude a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make an informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The 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 coastal environment of West Lewis is a biologically active marine system that requires thorough ecological assessment. However, the assessment of marine ecology and protected species presented in the application is significantly lacking. It fails to provide a reliable understanding of ecological receptors in this sensitive area due to incomplete baseline data and methodologies that do not adequately capture the presence, behaviour, and habitat use of various species. Consequently, this deficiency compromises the evaluation of potential impacts on the ecosystem.

Specifically, otters, classified as a European Protected Species, have not been properly recognised within the assessment. The application overlooks their active use of coastal

regions for foraging and movement, leading to an inadequate analysis of how construction disturbance, noise, and increased activity could affect these animals. This failure to assess their core foraging range and behavioural patterns casts doubt on the conclusions regarding the absence of significant effects on otters.

Additionally, the assessment of basking sharks suffers from methodological flaws. It relies heavily on aerial surveys, which introduce a notable detection bias, particularly under Atlantic conditions. This reliance risks underestimating the presence of basking sharks, especially when compared to established land-based observations that demonstrate frequent use of these waters. Neglecting to incorporate or adequately consider such data results in an incomplete baseline, which further undermines the reliability of the conclusions drawn.

Due to these methodological limitations, the assessment's findings of negligible or non-significant effects are based more on assumptions than on solid evidence. The lack of comprehensive baseline data hinders any meaningful assessment of cumulative and indirect impacts, including those related to seasonal variations and broader ecosystem interactions. This raises uncertainties about the actual risks facing marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set out by the Environmental Impact Assessment regime and National Planning Framework 4, as it has failed to identify or assess protected species appropriately. This uncertainty prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Given these circumstances, it follows that consent cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions results in an unreliable assessment. These deficiencies obstruct a comprehensive evaluation of impacts on marine ecology and protected species and highlight the overarching issue that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

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

A notable contradiction arises within the application itself, as the developer asserts that there will be no significant adverse effects while also advancing a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated.

This contradiction undermines the credibility of the assessment and suggests that the conclusions drawn are not substantiated by the evidence provided. Furthermore, the assessment does not convincingly show that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these vital feeding grounds is not adequately considered, and the reliance on modelling approaches introduces a degree of uncertainty, particularly concerning severely declining species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, especially in instances where baseline data is lacking and the behavioural responses of the species are not fully understood.

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the West Lewis coastline's cultural heritage and community identity is fundamentally flawed. It fails to recognise this area as a living cultural landscape where the environment, language, tradition, and community are interconnected. The application adopts an overly simplistic viewpoint, treating heritage merely as a collection of isolated, static assets, rather than acknowledging their ongoing social, cultural, and spiritual roles within the community.

Particularly concerning is the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active burial grounds and spiritual sites, yet they are mischaracterised in the assessment as static features, disregarding their continued use, significance, and the implications of development on their surroundings. This inadequate portrayal leads to an incomplete

understanding of cultural effects and overlooks the vital role these sites play in community life.

Moreover, the assessment neglects intangible cultural heritage, including the Gaelic language, local traditions, and the longstanding relationship between the community and the coastal environment. These elements are essential to the area's identity but are entirely omitted from the evaluation, creating a critical gap in understanding the cultural impact of the proposed development.

There are also significant concerns regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity akin to that of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent conducted. This lack of meaningful engagement calls into question the legitimacy of the assessment and contravenes established principles for participation in matters affecting cultural and environmental interests.

A major procedural failure is the absence of a compliant Island Communities Impact Assessment, which is legally mandated under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to fulfil its legal duty to evaluate the social, cultural, and economic impacts on the island community, rendering the determination unlawful.

From a policy standpoint, these significant deficiencies position the proposal in direct conflict with the National Planning Framework 4, especially concerning the protection of historic assets and sites. The neglect to consider both tangible and intangible heritage, as well as to acknowledge living cultural practices, clearly diverges from policy requirements.

In summary, the failure to adequately assess living heritage, intangible cultural value, community rights, and statutory obligations culminates in a substantial evidential gap. The cultural impacts of the development have not been thoroughly evaluated, and the application does not offer a sufficient foundation for understanding the true cultural cost associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment concerning social impacts, health, and wellbeing is fundamentally flawed and lacks the necessary transparency for a valid evaluation. The developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the complete report remains unpublished. This lack of disclosure creates a significant evidential gap, hindering both public understanding and the competent authority's ability to grasp the full range of social risks identified by the developer's research.

Available summaries reveal that residents are currently facing measurable stress, anxiety, and concern due to the proposal's scale and proximity. These effects stem from direct engagement, making them concrete rather than speculative. Nevertheless,

the failure to release the full assessment limits scrutiny of these findings and restricts the ability to evaluate their importance within the decision-making framework.

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 own findings. Despite these concerns, they have not been adequately integrated into the main application or assigned appropriate significance. The withholding of the full Social Impact Assessment thus 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 crucial for developments of this magnitude, particularly when community character and functioning are at stake. By not providing the complete dataset, the application fails to establish a comprehensive evidential basis for weighing benefits against harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Developments must promote positive health outcomes and mitigate harm, yet the evidence available indicates current adverse effects that remain inadequately disclosed. Without the full assessment, compliance with this policy cannot be substantiated.

The procedural ramifications are considerable. The competent authority is unable to perform a robust socio-economic and health evaluation in the absence of the full Social Impact Assessment. This represents a material shortcoming within the application and a failure to satisfy the evidential requirements set forth by the Environmental Impact Assessment framework.

In summary, the non-disclosure of the complete Social Impact Assessment, coupled with evidence of existing adverse impacts, renders the assessment insufficient and unreliable. This prevents a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

Furthermore, the application inadequately represents the magnitude of the anticipated visual change. The size and proximity of the turbines are such that they would dominate views from residential areas, historic sites, and popular coastal locations. This would have a direct effect on visual amenity and undermine the landscape's defining qualities

of naturalness and remoteness. The assessment fails to adequately articulate the level of impact or its significance within the context of this sensitive landscape.

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

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

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

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

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

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

FISHERIES AND MARINE LIFE

The application presents a concerning lack of sufficient assessment regarding fisheries and marine life, failing to deliver a thorough evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and a thriving fishing industry. However, the proposal does not adequately show that these critical uses and habitats can be safeguarded or sustained without significant disruption.

A major flaw lies in the assumption that fishing activity can be displaced without adverse effects. The application does not provide any evidence that alternative fishing grounds are available, accessible, or able to support the additional pressure that displacement would create. This is a crucial oversight, as such displacement could lead to overfishing in other areas and may result in broader economic ramifications for the local fishing fleet. Without a clear, evidence-based assessment, the effects on fisheries and local livelihoods remain poorly understood.

Furthermore, the proposal carries substantial risks to marine species, particularly due to the underwater noise produced during construction. The anticipated high-energy hammer piling over an extended period is likely to disturb marine life across large areas, significantly impacting species like dolphins. The application's predictions regarding disturbance to a considerable proportion of the local bottlenose dolphin population are alarming; yet, the significance of these impacts is downplayed without adequate supporting evidence.

There exists a clear inconsistency in the application, acknowledging the necessity for licences to permit harm to European Protected Species while simultaneously describing the impacts as negligible. This contradiction undermines the credibility of the assessment and raises serious concerns about compliance with the Habitats Regulations, especially where harm is expected to such a degree that legal authorisation is needed.

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

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

In summary, the significant deficiencies in the 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.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the proposed onshore infrastructure is inadequate and fails to address the full range of impacts associated with what constitutes a single integrated project. There is a fundamental connection between the offshore turbines and the onshore works, yet these components are evaluated in isolation. This fragmented

assessment obscures the comprehensive understanding of the environmental and socio-economic repercussions that arise.

The onshore infrastructure encompasses cabling across protected moorland, the construction of a substation near Stornoway, and the necessary access routes through sensitive landscapes. These activities involve excavation in regions of deep peat, specifically within Barvas Moor, which serves as a critical carbon store and is an ecologically fragile habitat. The application lacks a thorough assessment of these impacts, which hinders a complete understanding of the overall environmental footprint of the project.

By not adequately addressing the onshore impacts, the application inhibits a proper evaluation of cumulative effects. According to the Environmental Impact Assessment process, it is essential that all elements of a project are considered collectively. The current separation of offshore and onshore elements means the combined impacts on peatlands, habitats, and local communities remain poorly understood.

Moreover, there are significant risks posed to sensitive habitats, including machair systems and peatland environments, which are protected under existing policies. The application fails to demonstrate that impacts on these critical habitats have been thoroughly assessed or that suitable avoidance measures are in place, resulting in a concerning evidential gap regarding biodiversity protection.

Concerns also arise about the carbon balance related to this proposal. Disturbance of peatland has the potential to release stored carbon, thereby creating a carbon debt that contradicts the goals of renewable energy initiatives. The application does not sufficiently address this matter or provide assurance that the overall carbon balance remains advantageous.

Additionally, routing infrastructure through active croft land introduces potential conflicts with established land use and legal rights. The application does not supply evidence that the necessary consents or processes have been initiated, which raises significant doubts about deliverability and the lawfulness of implementation.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding dark skies and nocturnal wildlife is a significant oversight in the Environmental Impact Assessment. The West Lewis coastline boasts exceptionally dark skies, which play a vital role in the area's environmental quality, cultural identity, and tourism appeal. The proposal includes permanent red aviation lighting that would be visible over long distances, resulting in a continuous and disruptive “wall of light” effect that would drastically change the night-time environment.

This application fails to evaluate how such lighting would impact visual amenity, landscape character, or the experiences of residents and visitors. This neglect is particularly troubling given the importance of dark skies to the local identity and the emerging tourism sector focused on astro-tourism. Consequently, there is a pronounced gap in the overall landscape and environmental assessment.

Moreover, there is no evaluation of the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are notably sensitive to artificial lighting due to their phototactic behaviour, which can cause disorientation and increase the risk of collisions. The application lacks any assessment of lighting impacts or a phototaxis study, failing to address how aviation lighting could affect these species or potentially raise mortality rates.

This issue is further compounded by the dependence on daytime survey data in the ornithological assessment, which overlooks nocturnal activity and its associated risks. For instance, species like Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this risk has not been assessed. The absence of site-specific night-time data leaves a crucial gap in understanding ecological impacts.

Without an assessment of nocturnal effects, it is impossible to ascertain whether protected species or designated sites would suffer adverse impacts. The standard of evidence required to exclude such adverse effects beyond reasonable scientific doubt remains unmet, invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission contravenes the National Planning Framework 4 regarding the safeguarding of natural areas and environmental quality. Furthermore, it diminishes the comprehensive evaluation of landscape and seascape impacts, as the character of night-time is an essential element of the environment.

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

TOURISM

The 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 proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the standards for sustainable development as mandated by statutory duties, national policy, and evidential benchmarks. This application mirrors the principal issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable

level of industrialisation was noted. It is now being presented within a more robust policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

The evidential foundation necessary for a proper determination is incomplete and unreliable. Notable gaps exist in the baseline data, and the application relies on an undefined design envelope along with unspecified mitigation measures. Key impact pathways have been omitted, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism. This results in an incomplete Environmental Impact Assessment, which fails to provide a comprehensive understanding of the likely significant effects or residual impacts.

Procedural failures are evident as well. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the incomplete Social Impact Assessment is a significant omission. These shortcomings hinder the competent authority from evaluating the impacts on community wellbeing, cultural identity, and economic resilience, thus rendering the application unsuitable for determination.

The proposal is in clear conflict with National Planning Framework 4. It does not demonstrate the protection of biodiversity, natural spaces, and cultural heritage, nor does it show that health and wellbeing impacts are acceptable. Additionally, it fails to provide evidence of a net economic benefit due to the absence of tourism impact modelling. Furthermore, 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 severe. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The necessary evidential standard to exclude adverse effects beyond reasonable scientific doubt has not been met, invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

The proposal would also lead to significant 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 impacts on tourism are all permanent effects that cannot be adequately mitigated.

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

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

Additional Comments

These turbines are raping our pristine environments without considering the wildlife we are trying to protect from pollution. The council must realize what they will lose in environment tourism and community by agreeing to such a development too close to the shore. Build them further out - Lewis is worth the investment

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: 88483DAD

Member of the public 1337

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a review of the Environmental Impact Assessment Report and associated documents, revealing significant planning, environmental, cultural, and procedural shortcomings. The proposed site is located 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 about the scale, proximity, and design of the proposal question its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application does not provide an adequate evidential basis for a lawful decision. Important environmental data is absent, baseline information is both limited and inconsistent, and many key elements of the proposal are not clearly defined. The use of a flexible design framework complicates the assessment of likely significant effects, and reliance on unspecified mitigation measures means their effectiveness cannot be evaluated. Consequently, the provided documentation fails to offer a full understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust evidence.

There are notable and serious conflicts with policy. The proposal seems inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These conflicts directly impact the statutory tests needed for consent and hinder the competent authority's ability to determine the development's acceptability within policy frameworks.

The scale of this proposal is unprecedented for the area, with large turbines proposed close to the shoreline, raising significant concerns about landscape capacity, visual dominance, and environmental impact. When considered together, the lack of sufficient information, dependence on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and unsuitable for lawful determination. Under these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally inadequate, failing to deliver a comprehensive, transparent, and reliable evaluation of the proposed project's environmental consequences. The incorporation of a flexible Project Design Envelope, lacking definitive turbine dimensions, layouts, or configurations, creates considerable uncertainty, obstructing a consistent application of a worst-case scenario. This severely compromises the integrity of the assessment, obscuring the actual environmental impacts of the development, and depriving both the public and the competent authority of a clear understanding of the potential effects.

Consent is sought based on the premise that environmental harm will be mitigated at a later date, which is procedurally unacceptable. The proposal leans heavily on unspecified mitigation measures, monitoring strategies, and management plans that are yet to be defined. This deferral of critical information to post-consent phases undermines the principles of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be clearly established before any determination is made.

Significant evidential shortcomings further complicate the situation, including gaps in baseline data and methodological limitations. Reliance on assumptions rather than site-specific evidence results in ambiguity concerning the scale and significance of impacts. The conclusions drawn, particularly those indicating negligible or non-significant effects, lack robust supporting data. This deficiency hampers the ability to assess cumulative and worst-case impacts and introduces scientific uncertainties that cannot align with statutory obligations.

The application consequently fails to meet the evidential threshold necessary under the Habitats Regulations, which is essential to exclude adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, especially regarding protected species and sensitive habitats. Furthermore, the proposal does not demonstrate adherence to 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 adequate safeguards are in place.

In summary, the dependence on an unspecified design envelope, the lack of defined mitigation strategies, and significant gaps in baseline data collectively render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies obstruct a lawful and robust evaluation of environmental effects, placing the competent authority in a position where it cannot adequately determine the application based on the information at hand.

ASSESSMENT OF ALTERNATIVES

The application fails to provide a thorough assessment of alternatives, which is a requirement of the Environmental Impact Assessment regime. Instead of offering a detailed comparison of viable alternatives based on their environmental effects, it merely outlines the evolution of the project. This narrative does not show that the developer has properly identified, evaluated, and chosen less harmful options over

more damaging ones.

There is a lack of clear and evidence-based comparisons regarding offshore locations, development scales, and design configurations. Notably, the application does not indicate that the possibility of placing turbines further offshore has been adequately considered, despite this option likely reducing visual, ecological, and coastal impacts. The West Lewis coastline is sensitive, and proximity to the shore is critical in assessing impact. Therefore, the absence of such analysis makes it impossible to conclude that the proposed siting is the least damaging choice.

This inadequacy also extends to the routing of cables and landfall assessments, where there is insufficient evidence that alternative routes have been thoroughly explored to minimise impacts on sensitive areas. This includes locations of cultural and spiritual significance like Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis shows that mitigation by design has not been implemented, relying instead on measures to mitigate after design.

Consequently, the application does not show that environmental harm has been minimised through careful site selection, layout, and routing of infrastructure. This neglects the established mitigation hierarchy, preventing the competent authority from ascertaining whether less harmful and more suitable alternatives are available. Without a solid assessment of alternatives, it cannot be concluded that the proposal is a sustainable or compliant solution.

From a policy standpoint, this inadequacy compromises adherence to National Planning Framework 4, especially regarding the protection of natural areas, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission, contributing to the overall conclusion that the application has not been sufficiently assessed to support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is profoundly lacking, failing to provide a comprehensive and reliable understanding of the ecological receptors within the highly sensitive and biologically active marine environment of West Lewis. The methodologies employed are inadequate, leading to incomplete baseline data that does not effectively capture the presence, behaviour, and habitat use of various species. Consequently, this assessment does not offer a solid evidential basis for evaluating potential impacts.

One significant shortcoming pertains to otters, classified as a European Protected Species. The application does not appropriately recognise or assess their active use of coastal areas for foraging and movement. This oversight, particularly regarding their core foraging range and behavioural patterns, means that the potential impacts of construction disturbance, noise, and increased activity remain inadequately evaluated. This lack of consideration undermines any conclusions drawn about the absence of significant effects on this species.

Further shortcomings are evident in the assessment of basking sharks, where reliance on aerial surveys introduces considerable detection bias, particularly under Atlantic conditions. Such an approach is likely to result in an underestimation of their presence, especially when compared to established land-based observations indicating their frequent use of these waters. The failure to adequately incorporate or consider this crucial data contributes to an incomplete baseline, further weakening the reliability of the conclusions presented.

These methodological flaws lead to conclusions of negligible or non-significant effects that are based on assumptions rather than solid evidence. The insufficiency of baseline data also hinders a meaningful assessment of cumulative and indirect impacts, such as seasonal variation and broader ecosystem interactions. This introduces uncertainty about the true scale 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 the identification and assessment of protected species are inadequate. This level of uncertainty prevents the exclusion of adverse effects beyond reasonable scientific doubt and necessitates the application of the precautionary principle. Under these circumstances, granting consent would not be lawful.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the ornithological impacts is seriously flawed, containing significant gaps in evidence and inconsistencies that cast doubt on its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already declining. However, the application does not adequately prove that these species will not be harmed. The proposed development is situated within key foraging areas and migratory routes, yet the assessment fails to thoroughly consider the risks of displacement, collision, and habitat loss.

There is a fundamental contradiction in the application; the developer claims no significant adverse effects, yet also presents a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises questions about the reliability of the assessment and suggests that the conclusions drawn are not supported by the evidence available.

Furthermore, the assessment does not convincingly demonstrate that seabirds linked to protected areas, including the Lewis Peatlands and St Kilda, will remain unaffected. The critical nature of these feeding grounds is inadequately addressed, and the reliance

on modelling approaches adds uncertainty, particularly for species like Kittiwakes and Fulmars that are in severe decline. The methodologies used likely underestimate mortality rates, especially given that baseline data is insufficient and behavioural responses are not fully understood.

The placement of turbines within an established migratory corridor presents an additional and considerable risk, effectively serving as a barrier along a primary flight path used by species moving 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 that have relatively small global populations.

Regulatory requirements are not met, as the application does not achieve the evidential standard necessary to conclude that there will be no adverse effects on the integrity of protected sites. The combination of contradictory conclusions, data gaps, and limitations in modelling means that the standard of beyond reasonable scientific doubt is not fulfilled. This invokes the precautionary principle and makes it impossible to lawfully support consent.

These identified deficiencies also signify non-compliance with the National Planning Framework 4 regarding biodiversity protection and the preservation of natural assets. The inability to show that internationally important seabird populations will not be adversely impacted places the proposal in direct opposition to national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment regarding cultural heritage and community identity is significantly flawed, failing to acknowledge the West Lewis coastline as a vibrant cultural landscape where the environment, language, traditions, and community are deeply intertwined. The application approaches heritage in a limited manner, viewing it merely as a collection of isolated, static assets instead of recognising their ongoing social, cultural, and spiritual significance within the community.

A major shortcoming is the treatment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are active locations for burial and spiritual practices, yet they are mischaracterised as mere static features. This oversight neglects their continuing use and meaning, as well as the impact that development may have on their surroundings. Such misrepresentation leads to an incomplete assessment of cultural implications and overlooks their integral role in community life.

Moreover, the application does not take into account the intangible aspects of cultural

heritage, including the Gaelic language, local traditions, and the longstanding connection between the community and the coastal environment. These elements are essential to the area's identity but are wholly omitted from the assessment, which is a critical gap. Without addressing these factors, the cultural implications of the development cannot be fully grasped.

Concerns about community rights and engagement further exacerbate the situation. The Gaelic-speaking community has a unique cultural identity that aligns with recognised characteristics of Indigenous Peoples. However, there has been no process of Free, Prior and Informed Consent, which undermines the validity of the assessment and does not adhere to established principles of participation in decisions that affect cultural and environmental interests.

Additionally, there is a significant procedural flaw in the absence of a compliant Island Communities Impact Assessment, a requirement under the Islands (Scotland) Act 2018. The lack of this assessment means that the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community, rendering the process unlawful.

From a policy standpoint, these shortcomings directly contradict the National Planning Framework 4, particularly concerning the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage, as well as the failure to recognise living cultural practices, constitutes a clear violation of policy standards.

In summary, the inadequate assessment of living heritage, intangible cultural value, community rights, and legal responsibilities results in a significant evidential gap. The cultural impacts of the proposed development have not been adequately evaluated, and the application lacks a sufficient foundation for understanding the true cultural cost associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development raises serious concerns regarding the assessment of social impacts, health, and wellbeing, which is materially deficient and lacks the necessary transparency for a lawful evaluation. Although the developer commissioned a Social Impact Assessment, including focus groups with local residents, the full report remains unpublished. This significant evidential gap obstructs both public understanding and the competent authority's ability to grasp the full extent of social risks identified through the developer’s own research.

Residents are reportedly experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement and are, therefore, not speculative in nature. However, the failure to disclose the complete assessment hampers proper scrutiny of the findings and restricts the ability to assess their significance in the decision-making process.

There is evidence indicating that the proposal is seen as a direct threat to community

identity and cohesion, with “cultural loss” highlighted in the developer’s findings. Despite this, such impacts have not been adequately incorporated into the main application or afforded appropriate consideration. The withholding of the full Social Impact Assessment conceals the genuine human and social costs associated with the development.

This lack of transparency detracts from 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 functionality might be compromised. By failing to provide the complete dataset, the application does not offer a comprehensive evidential basis for weighing the benefits against the harms.

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

The procedural implications of these omissions are significant. The competent authority is unable to perform a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a material deficiency within the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment framework.

In summary, the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing adverse impacts, results in an incomplete and unreliable assessment. This incapacity to provide sufficient information obstructs a lawful determination of the application.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The application inadequately reflects the scale of visual change that would result from the introduction of large-scale turbines close to the shoreline. This oversight is significant, given that the West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and strong sense of remoteness. The proposed turbines would create a continuous industrial presence that fundamentally alters this character and leads to a permanent and irreversible transformation of the landscape.

Methodological issues also arise concerning the selection and representation of visual viewpoints. Evidence suggests that the chosen viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly regarding key cultural heritage sites and high-value landscapes. This raises concerns that the magnitude of the visual impact has been understated, thereby undermining the reliability of the assessment.

Moreover, there is a critical deficiency in assessing the interconnected relationship

between landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to the wider landscape setting, connected visually and spatially to the Atlantic horizon. The application fails to acknowledge this interdependence, treating these sites as isolated assets. This leads to an incomplete evaluation of the impacts on their setting and cultural significance.

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

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 scale of change posed by the proposal is incompatible with safeguarding landscape character, visual amenity, and the setting of culturally significant sites. Additionally, the absence of a thorough worst-case assessment further undermines any assertion of compliance with relevant policies.

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

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

CONSTRUCTION AND POLLUTION RISKS

The reliance on undefined future measures in the proposal raises significant concerns, particularly given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are susceptible to both sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it lacks sufficient detail on the methods for preventing, controlling, or monitoring these risks.

Moreover, the assessment of construction and pollution risks is notably incomplete, failing to provide the necessary details to evaluate the potential environmental effects adequately. The proposal entails substantial seabed preparation and installation works in a high-energy Atlantic environment; however, it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it depends on mitigation and contingency measures that are to be prepared after consent, which hinders any meaningful assessment of their adequacy or effectiveness.

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

The lack of detailed emergency response procedures further exacerbates these issues. By postponing contingency planning until after consent is granted, the application prevents a thorough evaluation of whether appropriate safeguards are in place to address pollution events. This approach introduces procedural risk and undermines the ability of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, deferring essential environmental safeguards contradicts the requirements outlined in the Environmental Impact Assessment regime. Significant effects and mitigation measures must be assessed prior to consent; therefore, the absence of this information renders a lawful determination impossible. Additionally, the application fails to demonstrate adherence to policy requirements related to environmental protection and water quality.

In summary, the shortcomings resulting from the absence of defined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts render the assessment materially deficient. These issues obstruct a thorough evaluation of construction and pollution risks, further supporting the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment of the proposed development's impact on fisheries and marine life is inadequate and does not provide a comprehensive evaluation of ecological or socio-economic repercussions. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing industry. However, the application does not adequately demonstrate how these habitats and uses can be preserved or sustained without significant disruption.

A critical concern is the presumption that fishing activities can be relocated without any adverse effects. The application fails to present any evidence indicating that alternative fishing grounds are available, accessible, or able to accommodate the increased pressure. This omission is particularly notable as displacement could lead to overfishing in other areas and could adversely affect the local fishing fleet's economic stability. The lack of a clear and evidence-based evaluation prevents a proper understanding of the implications for fisheries and the livelihoods dependent upon them.

Furthermore, the proposal poses considerable risks to marine species, especially due to the underwater noise produced during construction. The use of high-energy hammer

piling for prolonged periods is likely to cause disturbances over considerable distances, adversely affecting species such as dolphins. The predicted disturbance to a substantial portion of the local bottlenose dolphin population raises significant concerns, yet the application minimises the importance of these impacts without adequate supporting evidence.

The application contains a noticeable inconsistency regarding the acknowledgement of the necessity for licences to permit harm to European Protected Species, while simultaneously categorising impacts as negligible. This contradiction undermines the reliability of the assessment and raises issues related to compliance with the Habitats Regulations, especially where harm is projected to the extent that requires legal approval.

Additionally, the assessment does not adequately consider cumulative impacts resulting from multiple pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. The absence of a thorough evaluation of these combined effects hampers the ability to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The evaluation of the proposed onshore infrastructure is significantly lacking and does not account for the full range of impacts associated with what constitutes a single integrated project. The offshore turbines and the onshore works are interconnected, yet the assessment treats them separately, leading to a disjointed understanding that obscures the true magnitude of both environmental and socio-economic repercussions.

Onshore components include cabling that traverses protected moorland, the construction of a substation close to Stornoway, and necessary access routes through vulnerable landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, recognised as a crucial carbon store and ecologically sensitive environment. The application fails to deliver a thorough assessment of these impacts, limiting the ability to grasp the overall environmental footprint of the project.

The exclusion or postponement of the assessment for onshore impacts hinders the

proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all elements of a project be considered collectively. However, the division between offshore and onshore elements results in an incomplete understanding of the combined effects on peatlands, habitats, and local communities.

Furthermore, there are considerable risks to sensitive habitats, including machair systems and peatland environments, which are protected by policy. The application does not adequately show that the effects on these habitats have been thoroughly assessed or that effective avoidance measures have been implemented, leaving a distinct gap in evidence concerning biodiversity protection.

Additionally, the routing of infrastructure through operational croft land raises potential conflicts with existing land use and legal rights. The application does not substantiate that the necessary consents or processes have been properly initiated, which casts doubt on the feasibility and lawful execution of the project.

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

In summary, the fragmented treatment of project components, the absence of a comprehensive assessment, and the failure to provide clear evidence regarding environmental and land use impacts render this segment of the application incomplete and unreliable, thereby impeding 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.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the essential criteria of sustainable development when evaluated against legal obligations, national policies, and evidence-based standards. It echoes the central concerns that led to the denial of the Lewis Wind Power proposal in 2008, which deemed the level of industrialisation unacceptable. This current application, however, comes under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing.

A reliable evidential basis for determining the application is lacking. There are substantial gaps in baseline data, the use of an unclear design envelope, unarticulated reliance on mitigation measures, and the exclusion of critical impact pathways such as nocturnal wildlife, complete onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment remains incomplete, hindering a full understanding of the likely significant effects or residual impacts.

Procedural shortcomings are also evident. The failure to provide a compliant Island Communities Impact Assessment breaches the statutory requirements under the Islands (Scotland) Act 2018, while the lack of a full Social Impact Assessment

constitutes a significant omission. These shortcomings obstruct the competent authority's ability to evaluate effects on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

In addition, the proposal contradicts National Planning Framework 4. It does not demonstrate adequate protection of biodiversity, natural environments, and cultural heritage, fails to illustrate that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. Furthermore, the cumulative impact of both offshore and onshore components has not been appropriately assessed, obscuring effects on peatlands, carbon balance, habitats, and crofting land.

There are unresolved environmental risks that remain uncertain and potentially serious. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and occasionally inconsistent. The necessary evidential threshold to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful conclusion regarding acceptable impacts.

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

In summary, the application is procedurally and substantively inadequate for determination. The magnitude of information deficiencies, coupled with conflicts with policy and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority must either refuse consent based on these grounds or utilise the relevant regulatory provisions to mandate the submission of the missing information.

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

Additional Comments

This is astonishingly short sighted and will cause major distress to the natural world. For what, short term virtue signalling! An absolute disgrace!

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: A4CF2140

Member of the public 1338

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 frameworks. The objection is founded on a thorough review of the Environmental Impact Assessment Report and accompanying documents, which reveal significant deficiencies in planning, environmental considerations, cultural implications, and procedural integrity. Located off the west coast of the Isle of Lewis, the development is situated in an area renowned for its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. The design, scale, and proximity of the proposed development raise serious concerns about its compliance with statutory obligations, national policy, and sustainable development principles.

There is an alarming lack of a sound evidential foundation within the application, as critical environmental data is absent, baseline information remains limited and inconsistent, and essential components of the proposal are not defined. The flexible design framework undermines the ability to assess likely significant effects, while the reliance on unspecified mitigation measures hampers any evaluation of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, with assertions of negligible or non-significant effects lacking robust evidence to support them.

The proposal presents clear and serious policy conflicts, appearing at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly undermine the statutory tests necessary for consent and cast doubt on the ability of the competent authority to deem the development acceptable from a policy perspective.

The unprecedented scale of the proposal, with large turbines positioned perilously close to the shoreline, raises significant issues regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation strategies, evidential deficiencies, and apparent policy non-compliance illustrates that the application is fundamentally incomplete and incapable of securing a lawful determination. Given these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary comprehensiveness and transparency, leading to an unreliable depiction of the potential environmental consequences of the proposed development. The incorporation of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This aspect obstructs a consistent application of a worst-case scenario analysis, thereby undermining the integrity of the assessment. As a result, the environmental impacts presented may not accurately represent the final development, hindering both public understanding and the competent authority's capacity to gauge the true extent of the environmental effects.

The application places significant reliance on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent under the premise that environmental harm will be managed later precludes any substantive evaluation of effectiveness or assessment of residual impacts. This postponement of critical information to post-consent phases is procedurally unsound and contravenes the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation measures are clearly delineated prior to determination.

Furthermore, there are notable evidential deficiencies, such as gaps in baseline data, methodological limitations, and a reliance on assumptions instead of site-specific evidence. These issues lead to uncertainty regarding the magnitude and significance of impacts, particularly where findings of negligible or non-significant effects are advanced without robust supporting data. The lack of adequate information inhibits a clear comprehension of cumulative and worst-case impacts, introducing a level of scientific uncertainty that cannot be reconciled with statutory obligations.

Consequently, the application does not satisfy the evidential threshold established under the Habitats Regulations, which is necessary to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate adherence to National Planning Framework 4, which includes mandates related to biodiversity protection and environmental integrity, as it is not shown that impacts have been thoroughly assessed or that appropriate safeguards are in place.

In summary, the deficiencies arising from the undefined design envelope, the absence of specified mitigation strategies, and the gaps in baseline data contribute to an Environmental Impact Assessment Report that is both unreliable and incomplete. These shortcomings impede a lawful and rigorous assessment of environmental effects, leaving the competent authority unable to make an informed determination based on the information submitted.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment related to marine ecology and protected species is significantly inadequate, failing to provide a comprehensive and trustworthy understanding of the

ecological receptors present within the West Lewis coastal environment. This area is characterised by its sensitivity and biological activity, yet the methodologies used do not effectively capture the presence, behaviour, and habitat use of species. Consequently, the assessment lacks a solid evidential basis for assessing impacts.

One crucial shortcoming involves otters, classified as a European Protected Species. The application neglects to appropriately recognise and evaluate their active use of coastal regions for foraging and movement. The failure to consider their core foraging ranges and behavioural patterns results in an inadequate assessment of potential impacts from construction disturbances, noise, and increased activity. This gap undermines any assertions regarding the absence of significant effects on otters.

In addition, the evaluation of basking sharks is flawed; reliance on aerial surveys leads to substantial detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence, especially when compared to established land-based observations that indicate frequent utilisation of these waters. The oversight in incorporating relevant data culminates in an incomplete baseline, further weakening the reliability of the conclusions drawn.

These methodological flaws mean that any assertions of negligible or non-significant effects are grounded in assumptions rather than solid evidence. The lack of adequate baseline data also hampers a meaningful assessment of cumulative and indirect impacts, which encompass seasonal variations and broader ecosystem interactions. This situation generates uncertainty concerning the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application fails to comply with the Environmental Impact Assessment requirements and National Planning Framework 4, as it does not correctly identify or assess protected species. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, necessitating the application of the precautionary principle. Under these conditions, granting consent is not legally permissible.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application is fundamentally flawed and presents significant gaps in evidence, along with inconsistencies that cast doubt on its conclusions. The west coast of the Isle of Lewis is home to seabird populations of international importance, many of which are already in decline. However, the application fails to provide adequate evidence that these species will not be adversely impacted. Key foraging areas and migratory pathways are affected by the development, yet the

assessment does not thoroughly evaluate the risks associated with displacement, collision, or habitat loss.

There is a contradiction in the application, as the developer claims there will be no significant adverse effects while also pursuing a Habitats Regulations derogation, which is only necessary when significant harm is anticipated. This inconsistency raises concerns about the reliability of the assessment and suggests that the conclusions drawn are not backed by 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 be unaffected. The critical nature of these feeding grounds is not fully considered, and the reliance on modelling introduces uncertainty, particularly for species experiencing severe declines, such as Kittiwakes and Fulmars. The methods used likely underestimate mortality rates due to incomplete baseline data and an inadequate understanding of behavioural responses.

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

From a regulatory standpoint, the application does not meet the evidential standards needed to assert no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data deficiencies and modelling issues, fails to fulfil the requirement of being beyond reasonable scientific doubt. This invokes the precautionary principle and obstructs a lawful conclusion that could support consent. Additionally, these shortcomings indicate a lack of compliance with the National Planning Framework 4 regarding biodiversity protection and the preservation of natural assets. The inability to prove that internationally significant seabird populations will not be adversely affected directly contradicts national policy.

Overall, the assessment is unreliable, marked by internal inconsistencies, methodological flaws, and insufficient evidence. These deficiencies hinder a thorough evaluation of the impacts and lead to the conclusion that the application does not satisfy the legal requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is severely flawed, particularly in its treatment of the West Lewis coastline, which should be viewed as a dynamic cultural landscape where environment, language, tradition, and community are interconnected. Rather than recognising these elements, the application adopts a simplified perspective, treating cultural heritage as a collection of isolated, static assets. This approach neglects the active social, cultural, and spiritual roles these sites play within the community.

Significant deficiencies arise in the assessment of culturally important sites, notably

the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice. However, they are mischaracterised as static features, with the assessment failing to account for their ongoing use and significance, as well as the potential impacts of development on their surroundings. Such a mischaracterisation leads to an incomplete evaluation of cultural consequences and ignores their integral role in community life.

The assessment also neglects intangible cultural heritage, including the Gaelic language, local traditions, and the deep-rooted relationship between the community and its coastal environment. These elements are vital to the area's identity yet are omitted from the assessment, creating a considerable oversight. Without acknowledging these aspects, it is impossible to truly grasp the cultural implications of the proposed development.

Concerns regarding community rights and engagement are also apparent. The Gaelic-speaking population has a unique cultural identity recognised as characteristic of an Indigenous People. However, the process of Free, Prior and Informed Consent has not been pursued. This lack of meaningful engagement undermines the credibility of the assessment and disregards established principles regarding participation in decisions that affect cultural and environmental interests.

Additionally, the absence of a compliant Island Communities Impact Assessment constitutes a critical procedural failure. This assessment is mandated under the Islands (Scotland) Act 2018, and without it, the competent authority is unable to meet its legal obligation to assess the social, cultural, and economic impacts on the island community. This oversight alone makes it impossible to proceed lawfully with the proposal.

From a policy standpoint, these shortcomings place the proposal at odds with National Planning Framework 4, particularly concerning the preservation of historic assets and locations. The failure to adequately address both tangible and intangible heritage, alongside the need to acknowledge living cultural practices, represents a clear deviation from policy standards.

In summary, the deficiencies in assessing living heritage, intangible cultural value, community rights, and statutory obligations culminate in a substantial evidential gap. The cultural impacts of the development have not been thoroughly evaluated, and as a result, the application falls short of providing a sufficient basis for assessing the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of disclosure regarding the full Social Impact Assessment is a material deficiency that fundamentally undermines the evaluation of social impacts, health, and wellbeing associated with the proposed development. Although the developer engaged in a Social Impact Assessment and conducted focus groups with local residents, the comprehensive report has not been made public. This gap in evidence obstructs both

public insight and the ability of the competent authority to comprehend the full extent of social risks highlighted by the developer's own findings.

Summaries that are available suggest that local residents are already facing discernible levels of stress, anxiety, and concern due to the scale and proximity of the development proposal. These documented impacts stem from direct engagement with the community and are therefore not speculative in nature. However, the absence of the complete assessment stifles thorough scrutiny of these findings and diminishes the capacity to weigh their significance in the decision-making process.

Moreover, there is substantial indication that the proposal threatens the very identity and cohesion of the community, with the potential for "cultural loss" identified within the developer's findings. Regrettably, these critical impacts have not been sufficiently incorporated into the main application or given the requisite importance. The failure to release the full Social Impact Assessment thus obscures the true human and social costs that the development may impose.

This lack of transparency also detrimentally affects the Environmental Impact Assessment process. It is vital to fully comprehend the social, economic, and health repercussions of developments of this magnitude, particularly when community character and functionality stand to be impacted. By withholding the complete dataset, the application fails to furnish a comprehensive evidential foundation essential for evaluating the balance between benefits and detriments.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 in terms of health and wellbeing. Development proposals must foster positive health outcomes and mitigate harm; however, the evidence presented indicates existing adverse effects that remain inadequately disclosed. Without access to the complete assessment, it is impossible to affirm compliance with this policy.

The procedural ramifications of this omission are substantial. The competent authority is unable to conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This represents a significant shortfall within 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, in conjunction with evidence of existing adverse impacts, renders the assessment both incomplete and unreliable. This deficiency precludes a lawful determination and underscores that the application lacks the requisite supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual impacts associated with the proposed development is significantly inadequate, failing to recognise the extent of change and the sensitivity of the West Lewis coastline. This area is characterised by an open Atlantic horizon, an undeveloped landscape, and a profound sense of remoteness. The proposed

installation of large-scale turbines near the shoreline would introduce an overwhelming industrial presence that would fundamentally change this character, leading to a permanent and irreversible alteration of the landscape.

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

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

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

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

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

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

In summary, the assessment inadequately represents the scale of the impacts, the sensitivity of the environment, and the interrelated nature of landscape and heritage.

These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of pollution and construction risks related to the proposal is fundamentally lacking in detail, hindering any evaluation of potential environmental effects. Notably, the project entails extensive seabed preparation and installation works in a high-energy Atlantic environment. However, the absence of fully developed Construction Environmental Management Plans or Pollution Prevention Plans is alarming. The application relies on undefined mitigation and contingency measures that are intended to be formulated post-consent, which severely limits the opportunity for a meaningful assessment of their adequacy or potential effectiveness.

This reliance on unspecified future measures is especially troubling due to the sensitive nature of the receiving environment. The West Lewis coastline is characterised by clean coastal waters and critical habitats that are susceptible to disturbances from sediment and contamination. While the application acknowledges risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it fails to provide adequate detail on strategies to prevent, control, or monitor these risks.

Moreover, there remains significant uncertainty regarding the scale and behaviour of sediment plumes that may result from the proposed seabed disturbance and cable installation. In the absence of comprehensive modelling and clearly outlined management strategies, the extent, duration, and ecological consequences of these impacts cannot be accurately assessed. This uncertainty extends to the potential effects on marine species and habitats identified as sensitive within the broader assessment framework.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent, the application fails to allow for an evaluation of whether effective safeguards are in place to address potential pollution events. This not only introduces procedural risks but also undermines the ability of the competent authority to thoroughly assess environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. Assessments of likely significant effects and their corresponding mitigation measures must occur prior to granting consent. The absence of this critical information undermines the legality of the determination process. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, detailed management plans, and the uncertainties surrounding potential impacts culminate in an assessment that is materially deficient. These significant shortcomings impede a thorough evaluation of

construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry. However, the application does not provide a strong assessment of the ecological or socio-economic impacts related to these important resources. It fails to show how both fishing activities and marine habitats can be protected without significant disruption.

A major concern is the assumption that fishing activities can be moved without any negative consequences. The application lacks evidence indicating that other fishing grounds are available, accessible, or able to support the additional pressure. This gap in information is critical because displacing fishing efforts risks overfishing in other areas, which could lead to broader economic impacts on the local fishing fleet. Without a clear, evidence-based evaluation, the effects on fisheries and local livelihoods remain unclear.

Furthermore, the proposal poses substantial risks to marine species, particularly due to underwater noise created during construction. The use of high-energy hammer piling for extended periods is expected to disturb species across large distances, including dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is troubling, yet the application downplays these impacts without sufficient evidence to back this assessment.

There is also an inconsistency within the application regarding the need for licenses to allow harm to European Protected Species. While it acknowledges that such harm might occur, it simultaneously describes these impacts as negligible. This contradiction calls the credibility of the assessment into question and raises issues about compliance with the Habitats Regulations, especially when harm is anticipated to an extent that would require legal permission.

Additionally, the assessment neglects to take into account the cumulative impacts that come from multiple pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, it is impossible to gauge the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not prove that the development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity. This failure prevents any conclusion that the proposal constitutes sustainable development.

In summary, the application’s shortcomings—including a lack of evidence regarding fishing displacement, an underestimation of acoustic impacts, and internal

contradictions—render its assessment incomplete and unreliable. These issues hinder a robust evaluation of the impacts on marine life and fisheries.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal fails to assess the impact of aviation lighting on nocturnal wildlife and dark skies, which are critical to the area's environmental quality and tourism. The West Lewis coastline is known for its exceptionally dark skies, an important aspect of both cultural identity and tourism value. The introduction of permanent red aviation lighting will create a noticeable "wall of light" effect across the western horizon, significantly altering the night-time environment.

Visual amenity, landscape character, and the experiences of residents and visitors have not been evaluated in relation to this lighting. The lack of consideration is particularly concerning because dark skies are vital to the area's identity and the developing sector of astro-tourism. This oversight creates a notable gap in the environmental impact assessment.

Furthermore, there is no evaluation of the effects of this lighting 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 collisions. The application does not include any lighting impact assessment or phototaxis study, which means it does not evaluate how this lighting could affect these species or increase their mortality rates.

The ornithological assessment relies solely on daytime survey data, failing to capture nocturnal activity or the associated risks. For example, Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been considered. The absence of site-specific night-time data creates a crucial gap in understanding ecological impacts.

Without an assessment of nocturnal effects, it is impossible to determine whether protected species or designated sites could be adversely affected. The required standard of evidence to rule out adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and obstructing a lawful determination.

From a policy viewpoint, this omission contradicts National Planning Framework 4 regarding the protection of natural places and environmental quality. It also diminishes the overall assessment of landscape and seascape impacts, as the character of the night-time environment is integral to the overall ecosystem.

Overall, the lack of any evaluation of dark skies and nocturnal wildlife presents a significant evidential gap. The absence of baseline data, impact modelling, and species-specific analysis means that the application is incomplete and cannot support a lawful determination.

TOURISM

The application acknowledges that 86% of visitors to the Isle of Lewis are attracted by its scenery. However, it does not provide any quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of tourism. This is particularly concerning given that tourism has seen substantial growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy.

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

In an island community where economic diversification is limited, the lack of assessment regarding tourism impacts has broader implications for employment, local businesses, and community sustainability. Additionally, the absence of a compliant Island Communities Impact Assessment means that the economic vulnerabilities associated with tourism have not been evaluated as mandated under the Islands (Scotland) Act 2018.

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

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

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm exemplifies a significant shortcoming in meeting the criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. It echoes the fundamental issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. This current proposal is set against a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it still falls short of these essential requirements.

There are substantial deficiencies in the evidential basis provided for the determination of this application. Critical gaps exist in baseline data, and the use of an undefined design envelope raises concerns about reliability. Additionally, the proposed mitigation measures lack specification, and significant impact pathways, including those affecting

nocturnal wildlife, comprehensive onshore infrastructure, and tourism, have been omitted. Consequently, the Environmental Impact Assessment is incomplete, hindering a thorough understanding of the likely significant effects and residual impacts.

Procedural inadequacies are also evident in the application. The lack of a compliant Island Communities Impact Assessment breaches statutory duties outlined in the Islands (Scotland) Act 2018, while the non-disclosure of the complete Social Impact Assessment represents a material omission. These failings obstruct the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Moreover, the proposal conflicts with National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural environments, and cultural heritage, fails to ensure that health and wellbeing impacts are acceptable, and cannot provide evidence of net economic benefits due to the absence of tourism impact modelling. 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 related to marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The evidential threshold necessary to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and hindering any lawful conclusion that the 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 relationships, and negative impacts on tourism represent enduring effects that cannot be mitigated to an acceptable level.

In summary, the application is both procedurally and substantively inadequate for determination. The multitude of information deficiencies, alongside policy conflicts and unresolved environmental risks, precludes a lawful and evidence-based decision. The competent authority is urged to refuse consent on these grounds or to invoke the necessary regulatory provisions to compel the submission of the missing information.

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

Additional Comments

I wish to object to the proposed offshore wind farm development off the Isle of Lewis on environmental, social, and cultural grounds.

While I recognise the urgent need to transition to renewable energy, this proposal risks

causing significant and irreversible harm to a uniquely sensitive marine and coastal ecosystem. The waters surrounding Lewis are home to diverse wildlife, including seabirds, marine mammals, and fragile habitats that could be disrupted by construction noise, turbine operation, and increased vessel traffic.

Beyond environmental concerns, the development threatens the social fabric of local communities. Many residents rely on fishing and small-scale tourism, both of which could be negatively affected by industrialisation of the seascape. The visual impact of large-scale turbines may also deter visitors who come to experience the island's natural beauty and tranquillity.

Culturally, the Isle of Lewis holds deep significance, with strong Gaelic traditions and a landscape that has remained largely unchanged for generations. Introducing such infrastructure risks eroding this sense of place and heritage that is central to community identity.

Renewable energy projects must be carefully sited to balance climate goals with the protection of local environments and communities. In this case, the potential costs outweigh the benefits, and I urge decision-makers to reconsider.

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: 6AFDD30E

Member of the public 1339

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

Dear Sir/Madam

This letter formally objects to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under marine licensing and Environmental Impact Assessment regimes. The objection arises from an examination of the Environmental Impact Assessment Report and associated documentation, revealing significant deficiencies in planning, environmental, cultural, and procedural aspects. The project is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The design, scale, and proximity of the proposal raise serious questions about its alignment with statutory obligations, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis necessary for a lawful decision. Essential environmental data is absent, baseline information is inadequate and inconsistent, and critical elements of the proposal remain undefined. The flexible design framework used does not allow for a clear understanding of potential significant effects, and the reliance on unspecified mitigation measures means their effectiveness cannot be evaluated. Consequently, the documentation fails to provide a complete or informed assessment of the environmental, cultural, or community impacts, with assertions of negligible or non-significant effects lacking robust support.

Substantial policy conflicts are evident, as the proposal seems at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not establish that it can meet national requirements for the protection of biodiversity, climate interests, and environmental integrity. These discrepancies directly affect the statutory tests necessary for consent and compromise the competent authority's ability to determine that the development aligns with policy expectations.

The unprecedented scale of the proposal, with large turbines positioned in close proximity to the shoreline, raises significant concerns regarding landscape capacity, visual dominance, and environmental repercussions. Collectively, the lack of adequate information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance illustrate that the application is incomplete and incapable of sustaining a lawful determination. In light of these issues, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed, lacking a full, transparent, and reliable evaluation of the likely environmental effects of the proposal. A flexible Project Design Envelope is employed, which does not commit to specific turbine dimensions, layouts, or configurations. This introduces significant uncertainty and hampers the ability to apply a worst-case scenario consistently. Such an approach undermines the integrity of the assessment, meaning that the impacts presented may not truly reflect the development that will ultimately be constructed. Consequently, both the public and the competent authority are left without a clear understanding of the actual extent of the environmental effects.

Furthermore, the application relies extensively on mitigation measures, monitoring strategies, and management plans that are yet to be clearly defined. Consent is sought on the premise that any environmental harm will be mitigated at a later stage. This deferral prevents any meaningful evaluation of the effectiveness of those measures and hinders the assessment of residual impacts. It is procedurally unacceptable to postpone key information until post-consent stages, as this contradicts the purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be clearly established before determination.

In addition to the above issues, there are notable evidential deficiencies within the assessment, such as gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. These shortcomings lead to uncertainty regarding the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are drawn without robust supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, creating scientific uncertainty that cannot align with statutory requirements.

As a result, the application does not meet the evidential threshold necessary under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Moreover, the proposal does not demonstrate compliance with National Planning Framework 4, as it fails to adequately assess impacts or ensure that appropriate safeguards are in place for biodiversity protection and environmental integrity.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species has significant deficiencies that compromise its reliability and completeness. The West Lewis coastal environment

is biologically active and sensitive, yet the baseline data collected is insufficient. The methodologies used do not adequately capture the presence, behaviour, and habitat usage of various species, leading to a lack of sound evidence for assessing potential impacts.

One major oversight is the treatment of otters, which are recognised as a European Protected Species. The application does not properly acknowledge their active use of coastal areas for foraging and movement. Ignoring their core foraging range and behavioural habits means that the assessment fails to evaluate the impacts of construction disturbance, noise, and increased human activity on these animals. This gap undermines any conclusions drawn about the absence of significant effects on otters.

There are also substantial weaknesses in the assessment of basking sharks, where reliance on aerial surveys can lead to significant detection bias, particularly under Atlantic conditions. This methodology likely underrepresents the presence of basking sharks, especially when compared to established land-based observations that indicate frequent utilisation of these waters. The failure to integrate or adequately consider such crucial data further contributes to an incomplete baseline and diminishes the reliability of the conclusions reached.

These methodological flaws result in conclusions regarding negligible or non-significant effects being based on assumptions rather than solid evidence. The lack of adequate baseline data obstructs a proper evaluation of cumulative and indirect impacts, seasonal variations, and the interactions within the wider ecosystem. This adds uncertainty concerning the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to accurately identify and assess protected species. The uncertainty introduced by these deficiencies precludes the possibility of confidently excluding adverse effects, thus invoking the precautionary principle. In light of these issues, granting consent would not be lawful.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity within the application is profoundly lacking. It does not recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community intertwine. Instead, the application simplifies heritage into a collection of isolated, static assets, overlooking their ongoing social, cultural, and spiritual roles within the community.

Notably, the assessment inadequately addresses the significance of sites such as the cemeteries at Dalmore, Bragar, and Barvas, which are active burial and spiritual locations. The categorisation of these sites as mere static features fails to consider their continued use and the implications of development on their surroundings. This oversight leads to an incomplete understanding of cultural effects and neglects their integral position in community life.

Moreover, the application disregards intangible cultural heritage, including the Gaelic language and traditions, alongside the community's deep-rooted connection to the coastal environment. These elements are vital to the area's identity yet are conspicuously absent from the assessment, representing a considerable shortcoming. Without acknowledging these aspects, the cultural ramifications of the proposed development remain inadequately understood.

There are additional issues regarding community rights and engagement. The Gaelic-speaking population, identified as possessing a distinct cultural identity akin to that of an Indigenous People, has not been granted the process of Free, Prior and Informed Consent. This lack of genuine engagement calls into question the legitimacy of the assessment and contradicts established principles regarding participation in matters affecting cultural and environmental concerns.

Furthermore, a significant procedural error exists in the failure to complete a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The absence of this assessment inhibits the competent authority from fulfilling its legal obligations to evaluate the social, cultural, and economic effects on the island community. This alone renders the determination of the proposal unlawful.

From a policy perspective, these inadequacies position the proposal in direct conflict with National Planning Framework 4, particularly concerning the safeguarding of historic assets and locations. The neglect of both tangible and intangible heritage, as well as living cultural practices, clearly deviates from the necessary policy directives.

In conclusion, the cumulative failure to assess living heritage, intangible cultural value, community rights, and to adhere to statutory requirements creates a significant evidential void. The cultural impacts of the development have not been sufficiently evaluated, and the application lacks a robust foundation for understanding the true cultural cost of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of impacts on seascape, landscape, and visual aspects is significantly lacking and does not appropriately capture the extent of change or the sensitivity of the environment. The coastline of West Lewis features an open Atlantic horizon, an undeveloped character, and a pronounced sense of remoteness. The introduction of large turbines close to the shore would create a persistent industrial presence,

fundamentally changing this character and resulting in an irreversible transformation of the landscape.

The visual change has not been adequately represented in the application. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, which would diminish visual amenity and compromise the qualities of naturalness and remoteness. The assessment does not adequately convey the level of impact or its significance within such a sensitive landscape context.

Concerns arise regarding the selection and presentation of visual viewpoints. Evidence indicates that some viewpoints may fail to represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and valued landscapes. This raises the possibility that the visual impact magnitude has been underestimated, compromising the assessment's reliability.

There is also a failure to evaluate the interconnected nature of landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape context linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as separate entities rather than acknowledging their interdependence, resulting in an incomplete understanding of impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and their connection to the natural horizon. This signifies not just a visual impact but also a more extensive cultural and spatial detriment that has not been adequately assessed in the application.

From a policy viewpoint, the proposal directly contradicts National Planning Framework 4 regarding the safeguarding of natural areas and historic assets. The proposed changes are incompatible with the requirement to protect landscape character, visual amenity, and the settings of culturally significant sites. Additionally, the lack of a thorough worst-case assessment further weakens any assertion of policy adherence.

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

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

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline is characterised by clean coastal waters and significant habitats that are susceptible to sediment disturbance and contamination. The application fails to provide a comprehensive assessment of construction and pollution risks, lacking the necessary detail to evaluate potential environmental effects. Substantial seabed preparation and installation works are proposed in a high-energy Atlantic environment, yet there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans in place. Instead, the application defers to mitigation and contingency measures that are to be established post-consent, which impedes any meaningful assessment of their adequacy or effectiveness.

The reliance on undefined future measures raises significant concerns, particularly in light of the sensitive nature of the receiving environment. While the application acknowledges potential risks, such as sediment mobilisation and accidental chemical or oil spills, it does not adequately address how these risks will be prevented, controlled, or monitored. Moreover, there is a lack of clarity regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly articulated management strategies, it remains impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty extends to the potential effects on marine species and habitats that have already been identified as sensitive within the broader assessment.

Furthermore, the absence of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application obstructs the evaluation of whether appropriate measures are in place to respond to pollution events. This introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements stipulated by the Environmental Impact Assessment regime. Significant effects and mitigation must be evaluated prior to granting consent, and the absence of such information renders a lawful determination impossible. Additionally, the application fails to demonstrate compliance with policy requirements pertaining to environmental protection and water quality.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposed development introduces permanent red aviation lighting that would create a continuous and intrusive “wall of light” effect across the western horizon. This alteration fundamentally changes the night-time environment along the West Lewis coastline, which is characterised by exceptionally dark skies that are essential to the area's environmental quality, cultural identity, and tourism value. However, the

assessment of dark skies and their impact on nocturnal wildlife has been entirely omitted from the Environmental Impact Assessment, representing a significant gap in the evaluation process.

The application fails to evaluate how this lighting affects visual amenity, landscape character, and the experiences of both residents and visitors. Given the importance of dark skies to the local identity and the growing astro-tourism sector, this omission is critical. Additionally, there is no analysis of the potential impacts on nocturnal wildlife, particularly species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, which are highly sensitive to artificial lighting. The absence of a lighting impact assessment or a phototaxis study means that the effects of aviation lighting on these species, including the risk of disorientation and increased mortality, have not been considered.

Moreover, the ornithological assessment relies solely on daytime survey data, neglecting nocturnal activity and the associated risks. Species like Kittiwakes, which may forage or migrate at night, could also be affected by artificial lighting, but this risk remains unassessed. The lack of site-specific night-time data creates a significant shortcoming in understanding ecological impacts.

Without an evaluation 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 cannot be satisfied, invoking the precautionary principle and hindering a lawful determination.

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

Overall, the failure to assess dark skies and the impacts on nocturnal wildlife creates a considerable evidential gap. The application is incomplete due to the lack of baseline data, impact modelling, and species-specific analysis, rendering it incapable of supporting a lawful determination.

TOURISM

The assessment of tourism impacts within the application is significantly lacking, failing to adequately evaluate the economic and social repercussions for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. The application itself states that 86% of visitors are attracted by the scenery; however, it does not provide a quantified evaluation of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution of tourism.

The economic growth of tourism is notable, having risen from £65 million in 2017 to

over £81.5 million, while supporting more than 1,000 jobs and accounting for as much as 16% of the island's economy. Nevertheless, the application neglects to model the potential effects of industrialising the seascape and the resulting decline in environmental quality on Tourism Gross Value Added or the resilience of the wider economy. In the absence of this analysis, it remains unclear if the proposed development would yield a net economic benefit or detract from an established and expanding sector.

Moreover, the assessment does not account for the crucial role of environmental quality in sustaining tourism, particularly the significance of unspoiled landscapes and dark skies for enhancing visitor experience and catering to emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a substantial gap in understanding the impacts on a recognised and growing segment of the local economy.

Given the context of an island community with limited economic diversification, the failure to evaluate the impacts on tourism carries broader implications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been adequately assessed, as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, especially concerning economic impact and the necessity to show net benefit. Additionally, it contradicts strategic objectives that designate tourism as a priority growth sector and falls short of providing adequate evidence for the competent authority to evaluate the economic ramifications of the proposal.

In summary, the combined failure to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and acknowledge the island's economic dependency culminates in a significant evidential gap. This situation inhibits a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm exemplifies a significant failure to meet the requirements for sustainable development as defined by statutory duties, 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 extent of industrialisation was deemed unacceptable. Despite being submitted under a more stringent policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, the current application remains deficient.

There are substantial gaps in the evidential basis for determination, including incomplete baseline data, the use of an ambiguous design envelope, and unclarified mitigation measures. Additionally, vital impact pathways concerning nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects have been overlooked.

Consequently, the Environmental Impact Assessment is insufficient and fails to provide a complete understanding of potential significant effects or residual impacts.

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

Moreover, the proposal stands in direct contradiction to National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural places, and cultural heritage, nor does it show that health and wellbeing impacts are acceptable. There is also a failure to prove a net economic benefit owing to the lack of tourism impact modelling. The cumulative impacts of both offshore and onshore components have not been properly assessed, obscuring their 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 incomplete and occasionally inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been achieved, thus invoking the precautionary principle and preventing any lawful conclusion regarding acceptable impacts.

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

In summary, the application is procedurally and substantively unfit for determination. The significant deficiencies in information, combined with conflicts with policy and unresolved environmental risks, obstruct any lawful and evidence-based decision. It is imperative that the competent authority either refuse consent on these grounds or activate the relevant regulatory provisions to require the submission of the missing information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact

all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 4F681958

Member of the public 1340

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a thorough review of the Environmental Impact Assessment Report and accompanying documents, highlighting significant deficiencies in planning, environmental considerations, cultural impacts, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, an area distinguished by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. The scale and design of the proposal, along with its proximity to the shoreline, raise serious questions about its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis to support a lawful determination. It is evident that critical environmental data is absent, baseline information is both limited and inconsistent, and several key aspects of the proposal remain undefined. Furthermore, the use of a flexible design framework obstructs a clear understanding of the likely significant effects of the development. The reliance on unspecified mitigation measures undermines the ability to assess their effectiveness. Consequently, the documentation fails to facilitate a full or informed understanding of the potential environmental, cultural, or community impacts, leading to unsupported claims of negligible or non-significant effects.

There are notable and significant conflicts with policy. The proposal appears to be at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national obligations to protect biodiversity, climate interests, and environmental integrity. These inconsistencies directly relate to the statutory tests required for consent and compromise the competent authority's ability to conclude that the development is acceptable within a policy context.

The unprecedented scale of this proposal introduces large turbines in close proximity to the shoreline, which raises substantial concerns regarding landscape capacity, visual dominance, and environmental impact. Overall, the combination of inadequate 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 circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application is fundamentally flawed, relying on an Environmental Impact Assessment Report that is materially deficient and fails to present a comprehensive, transparent, or trustworthy account of the potential environmental effects of the proposal. The employment of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates significant uncertainty. This lack of specificity undermines the assessment's integrity, meaning that the impacts outlined may not accurately represent the final development, thus obscuring the true extent of environmental effects from both the public and the competent authority.

Moreover, the application's reliance on undefined mitigation measures, monitoring strategies, and management plans compromises the ability to evaluate their effectiveness or the residual impacts meaningfully. Seeking consent under these circumstances, where environmental harm will supposedly be addressed later, is procedurally unacceptable. This approach contradicts the purpose of the Environmental Impact Assessment regime, which mandates that significant likely effects and their mitigation be clearly delineated before determination.

Evidential deficiencies further compound the shortcomings of the proposal, highlighted by notable gaps in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. Such weaknesses foster uncertainty regarding the scale and significance of impacts, especially when conclusions suggest negligible or non-significant effects without robust supporting data. Insufficient information hinders a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty incompatible with statutory requirements.

As a result, the application does not meet the evidential threshold mandated under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate adherence to National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it does not provide assurance that impacts have been comprehensively assessed or that adequate safeguards exist.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation measures, and existing gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies preclude a lawful and thorough assessment of environmental effects, leaving the competent authority unable to determine the application based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application significantly falls short in its assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured comparison of realistic alternatives based on their environmental impacts, it presents a narrative detailing the project's evolution. This lack of rigorous analysis fails to establish that less harmful options have been adequately identified,

assessed, and selected over more damaging solutions.

There is a notable absence of a transparent, evidence-based comparison regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not show that the developer has given serious consideration to placing turbines further offshore, where the visual, ecological, and coastal impacts would likely be diminished. Given the sensitivity of the West Lewis coastline and the critical importance of proximity to shore in evaluating impact, the lack of such an analysis obstructs any conclusion that the proposed siting is indeed the least damaging option.

The inadequacies also extend to the assessment of cable routing and landfall, where there is insufficient evidence to show that alternative routes have been properly explored to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant sites such as Barvas Cemetery. The absence of a clear avoidance strategy and the lack of comparative analysis suggest that mitigation by design has not been properly utilised, instead relying on post-design mitigation measures.

Consequently, the application does not prove that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This represents a failure to adhere to the established mitigation hierarchy, hindering the competent authority's ability to ascertain whether more appropriate and less harmful alternatives exist. The lack of a thorough alternatives assessment leaves doubts about whether the proposal represents a sustainable or policy-compliant solution.

From a policy standpoint, this deficiency undermines compliance with National Planning Framework 4, particularly in safeguarding natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment constitutes a material omission that ultimately leads to the conclusion that the application has not undergone adequate evaluation 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, failing to offer a comprehensive and reliable understanding of ecological receptors in the West Lewis coastal environment. This area is a highly sensitive and biologically active marine system, yet the baseline data provided is incomplete, and the methodologies employed do not adequately capture the presence, behaviour, and habitat use of species. Consequently, the assessment lacks a sound evidential foundation for evaluating potential impacts.

A notable oversight concerns otters, a European Protected Species, where the application inadequately acknowledges and evaluates their active utilisation of coastal regions for foraging and movement. The failure to consider their core foraging range and behavioural patterns leads to an insufficient assessment of the potential impacts resulting from construction disturbance, noise, and increased activity. This gap

significantly undermines the conclusions regarding the absence of substantial effects on this species.

Additionally, the assessment of basking sharks reveals further shortcomings, as the reliance on aerial surveys introduces a considerable detection bias, especially under Atlantic conditions. This methodology is likely to underestimate their presence when compared with established land-based observations that indicate a frequent use of these waters. The omission of such relevant data results in an incomplete baseline, thereby compromising the reliability of the conclusions drawn.

These methodological flaws result in conclusions regarding negligible or non-significant effects being based on assumptions rather than on robust evidence. The lack of sufficient baseline data also impedes a meaningful evaluation of cumulative and indirect impacts, including seasonal variation and broader ecosystem interactions. This lack of clarity creates uncertainty regarding the true scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements outlined in the Environmental Impact Assessment regime and National Planning Framework 4, as the identification and assessment of protected species are inadequate. The uncertainty introduced by these deficiencies precludes the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these circumstances, it is not lawful to grant consent.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application under consideration presents a fundamentally flawed ornithological assessment, characterised by significant gaps in evidence and internal inconsistencies that severely undermine its conclusions. The proposed development is situated within key foraging areas and migratory pathways on the west coast of the Isle of Lewis, which supports internationally important seabird populations that are already facing decline. However, the application fails to satisfy the required evidential standard to demonstrate that these species will not be adversely affected.

A critical contradiction lies within the application itself; the developer asserts that there will be no significant adverse effects while also pursuing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This incongruity raises serious doubts about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the underlying evidence. Furthermore, the assessment does not adequately establish that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. It neglects to fully account for the importance of these feeding grounds, and the reliance

on modelling approaches introduces a degree of uncertainty, particularly concerning species in severe decline like Kittiwakes and Fulmars. The methodologies utilised are likely to underestimate mortality rates, especially in light of incomplete baseline data and insufficient understanding of behavioural responses.

The positioning of turbines within a recognised migratory corridor adds another layer of significant risk, effectively creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The application fails to thoroughly assess the long-term consequences of sustained mortality within this corridor or the potential effects on species with relatively small global populations.

Regulatory compliance is also called into question, as the application does not meet the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data gaps and limitations in modelling, means that the standard of beyond reasonable scientific doubt has not been achieved. This situation invokes the precautionary principle, obstructing a lawful conclusion in favour of consent. Additionally, the deficiencies identified represent a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to convincingly demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

In summary, the assessment is rendered unreliable due to internal inconsistency, methodological flaws, and insufficient evidence. These shortcomings obstruct a thorough evaluation of impacts and contribute to the overarching conclusion that the application fails to meet the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage is fundamentally insufficient, neglecting the West Lewis coastline as a vibrant cultural landscape where the environment, language, tradition, and community are deeply intertwined. The application adopts a simplified viewpoint, treating heritage as isolated, static assets rather than recognising their ongoing social, cultural, and spiritual roles within the community.

One significant shortcoming 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 mischaracterised as static features. The assessment fails to acknowledge their continued use and meaning, as well as the development's potential impact on their setting. This oversight results in an inadequate evaluation of cultural effects and disregards their importance within community life.

Additionally, the application neglects the intangible aspects of cultural heritage, which include the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These factors are vital to the area's identity but are entirely omitted from the assessment, creating a significant gap. Without

considering these elements, the cultural impact of the development cannot be adequately understood.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, which possesses a unique cultural identity and recognised characteristics of an Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack of genuine engagement undermines the validity of the assessment and fails to align with established principles of participation concerning decisions that affect cultural and environmental interests.

Moreover, a critical procedural failure is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. In the absence of this assessment, the competent authority cannot fulfil its legal obligations to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders a lawful determination impossible.

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

In summary, the shortcomings in evaluating living heritage, intangible cultural values, community rights, and statutory obligations create a substantial evidential gap. The cultural impacts of the proposed development have not been adequately assessed, and the application lacks a sound basis for determining the true cultural costs associated with it.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's failure to publish the full Social Impact Assessment is a significant evidential gap that hinders both public understanding and the ability of the competent authority to evaluate the potential social risks associated with the proposal. While the developer did commission this assessment, which included focus groups with local residents, the lack of transparency surrounding its findings raises serious concerns.

Available summaries highlight that residents are already feeling measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts are based on direct engagement and are not speculative. However, without access to the complete assessment, there is an impediment to properly scrutinising the findings and understanding their significance within the context of decision-making.

Moreover, there is evidence suggesting that the proposal is seen as a direct threat to community identity and cohesion, with “cultural loss” noted in the developer’s own findings. Yet, these impacts have not been adequately incorporated into the main application or assigned appropriate weight. The withholding of the full Social Impact Assessment obscures the true human and social costs linked to the development.

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

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. It is essential for development to support positive health outcomes and avoid harm, yet the evidence available indicates existing adverse effects that have not been fully disclosed. Without the full assessment, compliance with this policy remains unproven.

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the proposed development lacks sufficient detail regarding the impacts on seascape, landscape, and visual elements, failing to appropriately address the extent of change and the sensitivity of the local environment. The West Lewis coastline is characterised by its expansive Atlantic horizon, its undeveloped nature, and a strong sense of remoteness. The planned introduction of large-scale turbines near the shoreline would result in a continuous industrial presence that fundamentally alters this character and leads to a permanent transformation of the landscape.

The application inadequately conveys the scale of the visual change that would occur. Due to the size and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations. This would directly undermine visual amenity and diminish the naturalness and remoteness that define the area. The assessment does not effectively communicate the significance of this impact within the context of such a sensitive landscape.

There are notable methodological flaws concerning how visual viewpoints are selected and presented. Evidence indicates that these viewpoints may not fully account for the most sensitive receptors or the worst-case scenarios, especially concerning important cultural heritage sites and valued landscapes. This raises the risk that the assessment has understated the magnitude of visual impacts, thus compromising its reliability.

Another significant shortcoming is the failure to consider the interconnected nature of landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are linked to the broader landscape through visual and spatial relationships with the Atlantic horizon. The assessment treats these heritage assets as isolated rather than recognising their interdependence, which leads to an incomplete evaluation of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal directly contravenes the principles outlined in National Planning Framework 4 regarding the safeguarding of natural environments and historic assets. The anticipated changes are inconsistent with the obligation to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case scenario assessment further calls into question any claims of adherence to policy requirements.

It is evident that the identified impacts cannot be effectively mitigated. Given the size, height, and proximity of the turbines, their presence would be overwhelming and unavoidable. Therefore, the resulting changes are fundamental and permanent, not amenable to reduction through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The application proposes substantial seabed preparation and installation works in a high-energy Atlantic environment, but it lacks the necessary detail to assess potential environmental effects adequately. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans, and it relies heavily on mitigation and contingency measures that would only be prepared after consent. This approach is particularly concerning given the sensitivity of the West Lewis coastline, which supports clean coastal waters and important habitats that could be adversely affected by sediment disturbance and contamination.

The application acknowledges various risks, including sediment mobilisation and potential chemical or oil spills, yet it provides insufficient information on how these risks will be prevented, controlled, or monitored. Furthermore, there is uncertainty regarding the behaviour and scale of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to gauge the extent, duration, or ecological

effects of such impacts, raising concerns about their implications for marine species and habitats that have already been identified as sensitive.

The lack of detailed emergency response procedures further exacerbates these issues. By postponing contingency planning until after consent is granted, the application hinders an assessment of whether adequate safeguards are in place to address pollution incidents. This creates procedural risks and undermines the competent authority's ability to evaluate environmental protection measures at the time of determination.

From a regulatory standpoint, this deferral of critical environmental safeguards conflicts with the stipulations of the Environmental Impact Assessment regime, which requires an assessment of likely significant effects and mitigation measures prior to granting consent. The absence of crucial information means that a lawful determination cannot be made. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the shortcomings of not having defined mitigation measures, the lack of detailed management plans, and the uncertainty regarding potential impacts contribute to a materially deficient assessment. These issues prevent a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment related to fisheries and marine life fails to provide a thorough evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry. However, the application does not convincingly demonstrate that these important uses and habitats can be safeguarded or maintained without considerable disruption.

A critical concern arises from the assumption that fishing activity can be displaced without any negative consequences. The application lacks evidence showing that alternative fishing grounds are available, accessible, or capable of withstanding additional pressure. This significant omission risks the potential for overfishing in other areas and may lead to broader economic repercussions for the local fishing fleet. In the absence of a clear, evidence-based assessment, the implications for fisheries and local livelihoods remain inadequately understood.

Moreover, the proposal introduces considerable risks to marine species, particularly due to the underwater noise generated during construction. High-energy hammer piling conducted over an extended period is likely to disturb a wide range of marine life, including species such as dolphins. The anticipated disruption to a significant portion of the local bottlenose dolphin population is alarming; however, the application seems to downplay the importance of these effects, lacking sufficient supporting evidence.

There is also a notable inconsistency within the application itself, where the necessity

for licences to permit harm to European Protected Species is recognised, yet the impacts are simultaneously described as negligible. This contradiction severely undermines the credibility of the assessment and raises significant concerns regarding compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

Furthermore, the assessment neglects to consider the cumulative impacts arising from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. Without a comprehensive evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions remains undetermined.

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

In conclusion, the deficiencies in evidence concerning fishing displacement, the minimisation of acoustic impacts, and the internal inconsistencies within the application render the assessment both incomplete and unreliable. These shortcomings inhibit a thorough evaluation of impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the project is fundamentally flawed, as it fails to evaluate onshore infrastructure in conjunction with offshore elements, resulting in a fragmented analysis that conceals the true magnitude of environmental and socio-economic repercussions. The offshore turbines are interconnected with onshore works, including cabling through protected moorland, the construction of a substation near Stornoway, and access routes across sensitive landscapes. These onshore activities involve excavation in areas of deep peat, notably within Barvas Moor, an essential carbon store and ecologically significant habitat. The absence of a thorough examination of these impacts hinders a complete understanding of the project's environmental footprint.

The lack of a unified assessment of both onshore and offshore impacts leads to an inadequate evaluation of cumulative effects, violating the Environmental Impact Assessment process, which mandates consideration of all project components as a whole. Consequently, the combined impacts on peatlands, habitats, and local communities remain insufficiently understood. Furthermore, there are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected under policy. The proposal does not adequately demonstrate that the potential impacts on these habitats have been thoroughly evaluated or that effective avoidance measures have been implemented, revealing a significant evidential gap regarding biodiversity protection.

Concerns also arise surrounding carbon balance, as the disturbance of peatland may release stored carbon, leading to a carbon debt that contradicts the goals of renewable

energy initiatives. The application fails to address this critical issue or prove that the overall carbon balance is favourable. Moreover, routing infrastructure through active croft land raises potential conflicts with established land use and legal rights, with the application lacking evidence that necessary consents or processes have been initiated, raising serious questions about its feasibility and compliance with legal requirements.

From a policy standpoint, the application's failure to assess the project comprehensively and to ensure 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 demonstrate that the impacts can be avoided or mitigated further weakens the application. Collectively, the disjointed nature of the project components, the absence of a comprehensive assessment, and the lack of evidence concerning environmental and land use impacts render this part of the application both incomplete and unreliable, ultimately obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife represents a critical gap within the Environmental Impact Assessment. The coastline of West Lewis is renowned for its exceptionally dark skies, which are essential for environmental quality, cultural identity, and tourism, particularly in relation to the growing sector of astro-tourism. The proposal introduces permanent red aviation lighting that would be visible over vast distances, creating an intrusive “wall of light” across the western horizon and fundamentally changing the night-time environment.

Moreover, the application fails to evaluate the implications of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This oversight is particularly concerning given the significance of dark skies to the identity of the area. The lack of consideration for these impacts leads to a considerable gap in the overall assessment of the landscape and environment.

More alarmingly, there is no examination of how the proposed lighting will affect nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly vulnerable to artificial lighting due to their phototactic behaviour, which can cause disorientation and increase the risk of collisions. The application lacks any lighting impact assessment or phototaxis study, resulting in a failure to evaluate how the aviation lighting might impact these species or contribute to increased mortality rates.

This issue is exacerbated by the dependence on daytime survey data in the ornithological assessment, which overlooks nocturnal activity and the associated risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this risk has not been addressed. The absence of site-specific night-time data creates a significant gap in understanding the ecological impacts involved.

Without a thorough assessment of nocturnal effects, it becomes impossible to

ascertain whether protected species or designated sites could be adversely impacted. The necessary evidential standard needed to exclude adverse effects beyond reasonable scientific doubt cannot be achieved, thus invoking the precautionary principle and hindering lawful determination.

From a policy perspective, this omission contradicts the National Planning Framework 4 concerning the protection of natural spaces and the maintenance of environmental quality. It also diminishes the overall assessment of landscape and seascape impacts, as the character of night-time environments is a vital aspect of the natural setting.

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

TOURISM

The assessment regarding 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 fundamentally fails to meet the criteria of sustainable development as evaluated against statutory obligations, national policies, and evidential standards. This application echoes the critical issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was highlighted. Presenting it now under a policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing does not mitigate these concerns.

Moreover, the application lacks a complete and reliable evidential basis for decision-making. There are significant deficiencies in baseline data, the utilisation of an undefined design envelope, reliance on unspecified mitigation measures, and the omission of vital impact pathways such as nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, hindering a full understanding of potential significant effects or residual impacts.

Additionally, clear procedural shortcomings exist. The failure to submit a compliant Island Communities Impact Assessment breaches statutory duties as outlined in the Islands (Scotland) Act 2018, and not disclosing the full Social Impact Assessment is a substantial omission. These gaps inhibit the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal conflicts directly with National Planning Framework 4. It does not demonstrate effective protection of biodiversity, natural environments, and cultural heritage, fails to establish that health and wellbeing impacts are acceptable, and cannot provide evidence of a net economic benefit as it lacks tourism impact modelling. Additionally, the cumulative impacts of both offshore and onshore elements have not been adequately assessed, thereby obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. The evaluations regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and contain internal inconsistencies. The evidential

standard necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, activating the precautionary principle and obstructing a lawful conclusion that impacts are acceptable.

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

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

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

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: 8BE38C9E

Member of the public 1341

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

Dear Sir/Madam

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

A critical issue with the application is the lack of a solid evidential basis for any lawful determination. Important environmental data has been omitted, baseline information is both limited and inconsistent, and vital aspects of the proposal remain undefined. This flexible design framework complicates the assessment of potential significant effects, while the unspecified mitigation measures leave their effectiveness unexamined. Consequently, the supporting documentation fails to facilitate a comprehensive understanding of the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by robust evidence.

Moreover, there are notable policy inconsistencies. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate that it can satisfy national requirements to protect biodiversity, climate interests, and environmental integrity. These inconsistencies directly affect the statutory tests for consent and compromise the ability of the competent authority to assess the development's acceptability in terms of policy.

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

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

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

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

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 application presents serious concerns regarding its compliance with regulatory standards, particularly in relation to the evidential threshold necessary to assert no adverse effect on the integrity of protected sites. The presence of contradictions within the conclusions, along with data gaps and limitations in the modelling approaches, results in a failure to achieve the level of certainty required beyond reasonable scientific doubt. This inadequacy engages the precautionary principle, which raises

significant legal issues regarding the validity of the application for consent.

Furthermore, the assessment lacks sufficient evidence to demonstrate that the internationally important seabird populations associated with protected areas such as the Lewis Peatlands and St Kilda will remain unaffected. The critical nature of these feeding grounds is not thoroughly addressed, and the reliance on modelling creates uncertainty, especially concerning declining species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate potential mortality, particularly when baseline data is lacking and the behavioural responses of these species are not fully understood.

Additionally, the siting of turbines within a recognised migratory corridor poses a substantial risk, creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The assessment fails to adequately evaluate the long-term consequences of sustained mortality within this corridor and the potential impacts on species with small global populations.

The assessment as it stands is fundamentally flawed, riddled with internal inconsistencies and methodological weaknesses that undermine the reliability of its conclusions. These deficiencies prevent a thorough evaluation of the potential impacts, leading to the conclusion that the application does not fulfil the statutory requirements necessary for determination. The implications of failing to protect biodiversity and natural assets under National Planning Framework 4 are clear, placing the proposal in direct opposition to national policy and raising urgent concerns about its overall validity.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity is significantly deficient, failing to acknowledge the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are fundamentally intertwined. The application adopts an overly simplistic approach, viewing heritage as a collection of separate, unchanging assets, rather than recognising their continuous social, cultural, and spiritual roles within the community.

A major shortcoming is the handling of culturally important sites, specifically the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active burial sites and centres for spiritual practice, yet they are characterised as static elements in the assessment. This oversight neglects their ongoing significance, use, and the implications of development on their surroundings. Such a misrepresentation leads to an incomplete understanding of cultural impacts, disregarding their integral role in community life.

Additionally, the assessment overlooks the intangible aspects of cultural heritage, which encompass the Gaelic language, traditions, and the enduring relationship between the local community and the coastal environment. These components are vital to the area's identity, yet they are completely excluded from consideration,

marking a considerable gap. Without addressing these elements, the true cultural impact of the proposed development remains unclear.

There are also serious concerns regarding community engagement and rights. The Gaelic-speaking population maintains a unique cultural identity recognised as characteristic of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This lack of genuine engagement calls into question the validity of the assessment and fails to adhere to established principles regarding participation in matters that affect cultural and environmental interests.

Moreover, a crucial procedural oversight 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 is unable to meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This alone renders a lawful determination impossible.

From a policy standpoint, these shortcomings place the proposal at odds with National Planning Framework 4, particularly concerning the preservation of historic assets and spaces. The failure to take into account both tangible and intangible heritage, as well as to acknowledge living cultural practices, constitutes a clear violation of policy requirements.

In summary, the neglect to assess living heritage, intangible cultural values, community rights, and statutory obligations creates a substantial evidential void. The cultural ramifications of the proposed development have not been adequately examined, and the application fails to offer a solid foundation for determining the genuine cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer commissioned a Social Impact Assessment that involved focus groups with local residents, but the full report has not been made public. This omission creates a significant evidential gap and hinders both public understanding and the competent authority's ability to evaluate social risks identified in the developer's research. Available summaries reveal that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts stem from direct engagement with the community and are not mere speculation. However, the lack of access to the complete assessment limits scrutiny of the findings and affects the evaluation of their significance in the decision-making process.

The proposal has also been perceived as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's own findings. Nevertheless, these impacts have not been adequately incorporated into the main application or given the necessary attention. The failure to disclose the full Social Impact Assessment obscures the true human and social cost associated with the development.

This lack of transparency compromises the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for projects of this magnitude, especially when community character and functioning are at stake. Without the complete dataset, the application does not provide a full evidential basis for weighing benefits against harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Developments must promote positive health outcomes and mitigate harm; however, existing evidence suggests negative effects that have not been fully revealed. Without the complete assessment, it cannot be shown that the application complies with this policy.

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

Overall, the non-disclosure of the full Social Impact Assessment, along with the evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This limits the ability to make a lawful determination and reinforces the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual and landscape impacts associated with the proposed development is significantly flawed and fails to capture the true scale of change and the sensitivity of the surrounding environment. The West Lewis coastline, characterised by its expansive Atlantic horizon, unspoiled nature, and profound sense of isolation, would be profoundly affected by the presence of large-scale turbines situated near the shore. Such an industrial presence would fundamentally transform this unique character, leading to an irreversible alteration of the landscape.

Moreover, the application inadequately reflects the extent of visual change that would ensue. The size and closeness of the turbines would dominate views from local residential areas, historically significant sites, and popular coastal spots. This intrusion would detract from visual amenity and compromise the cherished qualities of naturalness and remoteness. The assessment does not adequately communicate the significance of these impacts, particularly given the sensitivity of the landscape in question.

Concerns regarding the methodology employed in selecting and presenting visual viewpoints are also evident. There is compelling evidence to suggest that the chosen viewpoints do not adequately capture the experience of the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and valuable landscapes. This raises the possibility that the visual impacts have been underestimated, thereby compromising the credibility of the assessment.

Additionally, the assessment fails to recognise the interconnectedness of landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a larger landscape that is visually and spatially connected to the Atlantic horizon. By treating these heritage assets as isolated features, the assessment overlooks their interdependencies, resulting in an incomplete understanding of the impacts on their settings and cultural significance.

The anticipated industrialisation of the seascape would disrupt these vital relationships, affecting how heritage assets are perceived and severing their ties to the natural horizon. This constitutes not just a visual disturbance but also a more extensive cultural and spatial detriment that has not been thoroughly evaluated within the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 regarding the safeguarding of natural areas and historic assets. The scale of proposed change is at odds with the requirement to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case scenario assessment further weakens any assertion of compliance with policy guidelines.

It is evident that the identified impacts cannot be effectively mitigated. The sheer scale, height, and proximity of the turbines guarantee a dominant and unavoidable presence. Thus, the anticipated changes are fundamental and permanent, rather than something that can be reduced to an acceptable level through mitigation efforts.

In summary, the assessment fails to accurately convey the extent of impact, the sensitivity of the environment, and the intertwined relationship of landscape and heritage. These shortcomings inhibit a credible evaluation and reaffirm the position that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal is fraught with serious deficiencies that prevent a thorough evaluation of construction and pollution risks. There is a troubling absence of detailed Construction Environmental Management Plans and Pollution Prevention Plans, essential for a project involving substantial seabed preparation and installation in a challenging Atlantic environment. Instead, the application relies on undefined mitigation and contingency measures, to be formulated after consent, thereby obstructing any meaningful assessment of their effectiveness or adequacy.

This reliance on future, unspecified measures is particularly alarming in light of the West Lewis coastline's sensitivity, which features clean coastal waters and crucial habitats that are susceptible to sediment disruption and contamination. While the application recognises risks such as sediment mobilisation and the potential for chemical or oil spills, it falls short of providing sufficient detail on prevention, control, or monitoring strategies.

There is significant uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling or clearly articulated management strategies, it is impossible to ascertain the extent, duration, or ecological ramifications of these potential impacts. This uncertainty also encompasses marine species and habitats deemed sensitive in the broader assessment.

Compounding these issues is the lack of detailed emergency response procedures. The decision to postpone contingency planning until post-consent limits the ability to evaluate whether adequate safeguards will be in place to address pollution incidents. This introduces unnecessary procedural risk and undermines the competent authority's capacity to assess environmental protection measures before making a determination.

Regulatory compliance is also a significant concern, as the deferral of essential environmental safeguards contravenes the Environmental Impact Assessment regime's requirements. It is imperative that likely significant effects and mitigation measures are assessed prior to granting consent; the absence of this information renders a lawful determination impossible. Furthermore, the application fails to demonstrate adherence to policy requirements concerning environmental protection and water quality.

Ultimately, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts combine to render the assessment materially deficient. These shortcomings highlight the inability to conduct a robust evaluation of construction and pollution risks, further reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application proposes a development that significantly lacks a thorough assessment of fisheries and marine life, failing to adequately evaluate ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and support an active fishing industry. However, the proposal does not sufficiently demonstrate how these vital uses and habitats can be protected or maintained in the face of potential disruptions.

A critical concern is the assumption made within the application that fishing activities can be displaced without repercussions. There is no evidence provided that alternative fishing grounds are available, accessible, or capable of withstanding the increased pressure that displacement would create. This significant omission raises the risk of overfishing in other areas, which could lead to broader economic consequences for the local fishing fleet. As a result, without an evidence-based assessment, the implications for fisheries and local livelihoods remain unclear.

Moreover, the proposal introduces serious risks to marine species, particularly due to the underwater noise generated during construction. The anticipated high-energy

hammer piling over an extended timeframe is likely to disturb species over large distances, notably impacting the local bottlenose dolphin population. Concerns regarding the predicted disturbance to a significant proportion of these dolphins are serious, yet the application appears to downplay these effects without providing adequate supporting evidence.

There is also an evident inconsistency within the application, as it acknowledges the need for licences to permit harm to European Protected Species while simultaneously describing such impacts as negligible. This contradiction undermines the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially when harm is expected to a degree that requires legal authorisation.

The assessment is lacking in its consideration of cumulative impacts resulting from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. Without a comprehensive evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not demonstrate adherence to 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. This lack of clarity prevents any conclusion that the proposal aligns with the principles of sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the proposed project is fundamentally flawed, as it fails to consider the entire scope of the integrated project, particularly the interrelation between the offshore turbines and the onshore works. This disjointed approach results in an incomplete understanding of the environmental and socio-economic impacts. The onshore components, which include cabling across protected moorland, the construction of a substation near Stornoway, and necessary access infrastructure, involve excavation through deep peat areas, notably within Barvas Moor. This area is not only a significant carbon store but also an ecologically sensitive habitat. The current application does not offer a comprehensive evaluation of these impacts, leading to a lack of clarity regarding the overall environmental footprint of the project.

Moreover, by omitting or postponing the assessment of onshore impacts, the application hinders a thorough evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all project elements must be examined collectively; however, the distinct treatment of offshore and onshore aspects prevents a full understanding of the combined impacts on peatlands, habitats, and local

communities. There are notable risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application falls short in demonstrating that the effects on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, resulting in a significant evidential gap in biodiversity protection.

Concerns also arise regarding the carbon balance as disturbing peatland may release stored carbon, potentially creating a carbon debt that contradicts renewable energy goals. The application inadequately addresses this critical issue and does not establish that the overall carbon balance remains favourable. Additionally, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The absence of evidence regarding the initiation of necessary consents or processes calls into question the project's deliverability and lawful implementation.

From a policy perspective, the disjointed assessment and the failure to protect peatlands, habitats, and land use interests contradict both the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be mitigated further undermines the credibility of the application. Collectively, the separation of project components, the lack of a comprehensive assessment, and insufficient evidence concerning environmental and land use impacts render this section of the application incomplete and untrustworthy, which obstructs a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

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

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

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

The reliance on daytime survey data within the ornithological assessment exacerbates

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

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

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

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

TOURISM

The Isle of Lewis tourism sector is vital, having grown from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. The assessment of tourism impacts related to the current application is materially deficient. It fails to evaluate the economic and social consequences for this key sector. While the application acknowledges that 86% of visitors are drawn by scenery, it does not quantify how large-scale offshore infrastructure could affect visitor numbers, behaviour, or overall economic contributions.

The assessment neglects the critical role of environmental quality in supporting tourism. Factors such as unspoiled landscapes and dark skies greatly enhance visitor experience, particularly for emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this deficiency, leaving a significant gap in understanding the impact on a recognised and growing segment of the local economy.

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

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, particularly regarding economic impact and the

necessity to show net benefit. It contradicts strategic objectives that prioritise tourism as a growth sector and fails to provide sufficient evidence for the competent authority to assess the economic consequences of the proposal.

Overall, the lack of a thorough evaluation of tourism impacts, the failure to consider environmental drivers of visitor behaviour, and the neglect of the island's economic dependency create a significant evidential gap. This undermines a robust evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements for sustainable development as outlined by statutory duties, national policy, and evidential standards. This application repeats the same critical issues that resulted in the 2008 refusal of the Lewis Wind Power proposal, which was deemed unacceptable due to the scale of industrialisation. Despite being presented under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it does not adequately address these concerns.

There are significant gaps in the evidence necessary for a sound determination. The application relies on an undefined design envelope and mitigation measures that lack specification. Key impact pathways have been omitted, such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism effects. This results in an incomplete Environmental Impact Assessment that does not provide a comprehensive understanding of the likely significant effects or residual impacts.

Procedurally, the application shows clear failings. The lack of a compliant Island Communities Impact Assessment violates statutory obligations under the Islands (Scotland) Act 2018, and the failure to present a complete Social Impact Assessment is a material omission. These deficiencies inhibit the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

Moreover, the proposal contradicts National Planning Framework 4, failing to demonstrate adequate protection for biodiversity, natural places, and cultural heritage. It does not substantiate that health and wellbeing impacts are acceptable, nor does it provide evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative effects of offshore and onshore elements have not been thoroughly assessed, which obscures the implications for peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. The assessments of marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also exhibit internal inconsistencies. The evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and obstructing a

lawful conclusion on the acceptability of impacts.

Additionally, 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 impacts on tourism represent permanent effects that cannot be effectively mitigated.

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

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 24D62BD1

Member of the public 1342

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted in accordance with the marine licensing and Environmental Impact Assessment regimes. The objection arises from a thorough examination of the Environmental Impact Assessment Report and accompanying documents, highlighting significant planning, environmental, cultural, and procedural deficiencies. The proposed site is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and a strong cultural identity. Concerns regarding the scale, proximity, and design of the project raise fundamental questions about its alignment with statutory requirements, national policy, and the principles of sustainable development.

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application is fundamentally flawed, as it heavily relies on mitigation measures, monitoring strategies, and management plans that are yet to be defined. Seeking consent on the premise that environmental harm will be managed later undermines the ability to evaluate the effectiveness of these measures or to assess the residual impacts of the proposal. This postponement of crucial information until after consent is granted is not only procedurally unacceptable but also runs counter to the purpose of the Environmental Impact Assessment regime, which mandates that significant effects and their mitigations should be established clearly before any determination.

Additionally, the Environmental Impact Assessment Report is materially deficient and fails to present a full, transparent, or reliable account of the potential environmental effects of the proposal. The introduction of a flexible Project Design Envelope, without specific commitments to turbine dimensions, layouts, or configurations, adds substantial uncertainty. This lack of specificity hinders a consistent assessment of a worst-case scenario, thereby undermining the integrity of the evaluation process. As a result, the impacts outlined may not accurately reflect the actual development that would be constructed, leaving both the public and the competent authority in the dark regarding the true extent of the environmental effects.

There are also significant evidential deficiencies present, including gaps in baseline data and methodological limitations, which lead to a reliance on assumptions rather than site-specific evidence. Such shortcomings create uncertainty surrounding the scale and significance of the impacts, especially where conclusions of negligible or non-significant effects are drawn without robust supporting data. The inadequate information provided prevents a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that is incompatible with statutory requirements.

Due to these deficiencies, the application does not meet the evidential threshold required under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. The precautionary principle must be applied, especially concerning protected species and sensitive habitats. Furthermore, 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 suitable safeguards are established.

In summary, the combination of an undefined design envelope, the absence of specified mitigation strategies, and the gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These inadequacies preclude a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make an informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application lacks a thorough assessment of alternatives, failing to adhere to the statutory requirements of the Environmental Impact Assessment regime. It does not

offer a structured, reasoned comparison of realistic alternatives based on their environmental effects. Instead, it presents a narrative regarding the project's development, which does not adequately demonstrate that less harmful options have been properly identified, assessed, and preferred over more damaging solutions.

There is no evidence-based or transparent comparison of alternative offshore locations, development scales, or design configurations. Specifically, the application does not indicate that the developer has genuinely considered positioning turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be lessened. Given the sensitivity of the West Lewis coastline, the lack of such analysis obstructs any conclusion that the proposed siting is the least damaging option.

Additionally, the deficiencies extend to the assessment of cable routing and landfall, with insufficient evidence that alternative routes have been adequately explored to mitigate impacts on sensitive receptors, including areas of cultural and spiritual significance like Barvas Cemetery. The absence of a clear avoidance strategy, coupled with the lack of comparative analysis, illustrates that mitigation by design has not been implemented. Instead, reliance appears to be placed solely 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 indicates a failure to adhere to the established mitigation hierarchy, hindering the competent authority's ability to determine whether less harmful and more suitable alternatives are available. Without a comprehensive assessment of alternatives, it cannot be concluded that the proposal is sustainable or compliant with relevant policies.

From a policy standpoint, these deficiencies compromise compliance with National Planning Framework 4, particularly regarding the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment represents a significant omission that contributes to the overall conclusion that the application has not been adequately evaluated and cannot sustain a lawful determination.

TOURISM

The economic and social implications for tourism on the Isle of Lewis are crucial, yet the assessment provided is materially deficient. Tourism relies heavily on the area's stunning wild coastline, near-pristine landscapes, dark skies, and unique sense of remoteness. It is noteworthy that 86% of visitors are drawn by the scenery; however, the application fails to quantify how large-scale offshore infrastructure might alter visitor numbers, behaviours, or the overall economic contribution to the region.

Since 2017, tourism has significantly expanded, with its value rising from £65 million to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. Nonetheless, the application does not model the potential impacts

that industrialisation of the seascape and the resultant loss of environmental quality could have on Tourism Gross Value Added or the broader economic resilience of the area. Without this critical analysis, it remains unclear whether the proposed development would yield a net economic benefit or harm a sector that is both established and growing.

The assessment neglects the essential role that environmental quality plays in enhancing tourism, particularly the significance of unspoiled landscapes and dark skies for the visitor experience, as well as for emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, resulting in a substantial gap in understanding the impacts on a recognised and expanding segment of the local economy.

For an island community that has limited economic diversification, the failure to consider tourism impacts carries far-reaching consequences for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been assessed, as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not adequately demonstrate compliance with National Planning Framework 4, particularly regarding economic impact and the requirement to show a net benefit. Additionally, it conflicts with strategic objectives that prioritise tourism as a growth sector and lacks the necessary evidence for the competent authority to evaluate the economic consequences of the proposal.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development when evaluated against statutory obligations, national policies, and evidential standards. This application mirrors the central issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the scale of industrialisation. Now, this new application is presented under a framework that more strongly emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

Significant gaps exist in the evidential basis for determining this application. There are deficiencies in baseline data, an undefined design envelope is employed, and unspecified mitigation measures are relied upon. Key impact pathways concerning nocturnal wildlife, complete onshore infrastructure, and tourism effects have not been addressed. Consequently, the Environmental Impact Assessment is inadequate and

fails to provide a clear understanding of the likely significant effects or residual impacts.

Moreover, there are notable procedural shortcomings. The lack of a compliant Island Communities Impact Assessment breaches statutory duties outlined in the Islands (Scotland) Act 2018. Additionally, the failure to disclose a comprehensive Social Impact Assessment represents 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 unfit for consideration.

This proposal stands in direct contradiction to National Planning Framework 4. It does not demonstrate protection for biodiversity, natural areas, and cultural heritage. Furthermore, it fails to show that impacts on health and wellbeing are acceptable and cannot provide 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, leading to obscured 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 incomplete and occasionally inconsistent. The necessary evidential threshold to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and obstructing a lawful conclusion regarding acceptable impacts.

Additionally, the proposal would bring about substantial and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual relationships, and the 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 information deficiencies, alongside policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority must either refuse consent on these grounds or utilise the relevant regulatory provisions to mandate the submission of the missing information.

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

Additional Comments

I would hope the developers would listen to the feedback from the community living in north west Lewis. I know the area very well and if I understand the mock ups provided by Northwind it seems the site will be a massive blight on the seascape.
I am a believer of the need to generate ‘green’ energy and wind is an excellent resource to harness. I understand there’s an alternative that moves the site further out (accepting the cost and accessibility factors will be higher) but which doesn’t clash

with the existing industry of tourism and open seas aspect of a beautiful coastline that the community values deeply. Listen to the people and literally respect their view.

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: 0BF9037F

Member of the public 1343

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

Dear Sir/Madam

This representation serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and robust cultural identity. Concerns arise regarding the scale, proximity, and design of the proposal in relation to its compatibility with statutory requirements, national policy, and the principles of sustainable development.

An adequate evidential basis for a lawful determination is notably lacking in the application. There is a deficiency in critical environmental data, with baseline information being both limited and inconsistent, while key elements of the proposal are not adequately defined. The flexible design framework employed inhibits a clear understanding of the likely significant effects, and the reliance on unspecified mitigation measures prevents an assessment of their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust supporting evidence.

The proposal exhibits clear and substantive conflicts with established policy. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. There is insufficient demonstration that the national requirements for the protection of biodiversity, climate interests, and environmental integrity can be satisfied. These conflicts directly impact the statutory tests required for consent and compromise the capacity of the competent authority to determine that the development is acceptable in policy terms.

The unprecedented scale of the proposal raises significant concerns, particularly with large turbines positioned in close proximity to the shoreline, thereby impacting landscape capacity, visual dominance, and environmental consequences. Collectively, the lack of sufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance illustrate that the application is incomplete and incapable of supporting a lawful determination. In light of these issues, the precautionary principle must apply.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application relies on an undefined Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations. This introduces significant uncertainty and undermines the integrity of the Environmental Impact

Assessment Report, preventing a consistent application of a worst-case scenario. Consequently, the impacts presented may not accurately reflect the development that could ultimately be constructed. This obscures the true extent of environmental effects, preventing both the public and the competent authority from having a clear understanding.

There are considerable evidential deficiencies, including insufficient baseline data, limitations in the methodology, and an overreliance on assumptions rather than site-specific evidence. This lack of robust supporting data results in uncertainty regarding the scale and significance of impacts, particularly when conclusions of negligible or non-significant effects are made. The absence of adequate information obstructs a clear understanding of cumulative and worst-case impacts, leading to scientific uncertainty that is incompatible with statutory requirements.

The application seeks consent based on the promise of addressing environmental harm through unspecified mitigation measures, monitoring strategies, and management plans at a later stage. This deferral of essential information to post-consent phases is procedurally unacceptable and contradicts the Environmental Impact Assessment regime's requirement that significant effects and mitigation measures are established before determination.

As a result, the application does not meet the evidential threshold mandated by the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, it fails to 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 appropriate safeguards exist.

In summary, the combination of relying on an undefined design envelope, the absence of specified mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These significant deficiencies hinder a lawful and robust assessment of environmental effects, meaning the competent authority cannot adequately determine the application based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species is fundamentally inadequate, failing to deliver a comprehensive and trustworthy understanding of ecological receptors in the West Lewis coastal environment. This marine system is highly sensitive and biologically active; however, the baseline data is incomplete, and the methodologies used do not adequately capture species presence, behaviour, and habitat use. Consequently, the assessment lacks a solid evidential foundation for evaluating potential impacts.

There is a significant oversight regarding otters, which are a European Protected

Species. The application does not adequately recognise or assess their active usage of coastal areas for foraging and movement. The failure to consider their core foraging range and behavioural patterns means the potential impacts of construction disturbances, noise, and increased activity have not been thoroughly evaluated. This flaw undermines any assertions regarding the absence of significant effects on this species.

Further shortcomings exist in the assessment of basking sharks, where a reliance on aerial surveys creates a substantial detection bias, particularly under Atlantic conditions. This methodology is likely to underrepresent their presence, especially when juxtaposed with established land-based observations that demonstrate frequent usage of these waters. The neglect to incorporate or thoroughly evaluate such data leads to an incomplete baseline and compromises the reliability of the findings.

The methodological flaws mean that the conclusions of negligible or non-significant effects are based more on assumptions than on solid evidence. Moreover, the absence of adequate baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This generates uncertainty about the actual level of risk 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 protected species have not been appropriately identified or assessed. The uncertainty involved prevents any exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In this context, granting consent cannot be justified lawfully.

In summary, the combination of incomplete baseline data, flawed methodologies, and unfounded conclusions renders the assessment unreliable. These inadequacies obstruct 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 basis.

ORNITHOLOGY AND SEABIRD IMPACTS

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

A critical inconsistency is evident in the application, where the developer asserts that there will be no significant adverse effects while simultaneously presenting a case for derogation under the Habitats Regulations, which is required only when significant

harm is anticipated. This contradiction raises serious doubts regarding the reliability of the assessment and suggests that its conclusions lack adequate support from the evidence provided.

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

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

Regulatory aspects reveal that the application does not satisfy the evidential threshold necessary to affirm that there will be no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, along with gaps in data and limitations in modelling, indicates that the requisite standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle and hinders a lawful conclusion in favour of consent.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is recognised as a dynamic cultural landscape, where the interplay of environment, language, tradition, and community is vital. However, the current assessment of cultural heritage and community identity is fundamentally inadequate. It adopts a reductive perspective, treating heritage merely as isolated, static assets and 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 as static features,

disregarding their continued use and the ramifications of development on their surroundings. This mischaracterisation leads to a flawed evaluation of cultural effects and ignores their integral role in community life.

Moreover, the application fails to consider intangible cultural heritage, including the Gaelic language and traditions that underpin the community's identity and its relationship with the coastal environment. These elements are notably absent from the assessment, representing a significant oversight. Without incorporating these factors, the full cultural impact of the development remains elusive.

Concerns extend to community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity, yet the process of Free, Prior and Informed Consent has not been pursued. This lack of meaningful engagement diminishes the legitimacy of the assessment and does not align with established principles for participation in matters impacting cultural and environmental interests.

Additionally, there is a critical procedural oversight in the absence of a compliant Island Communities Impact Assessment, mandated by the Islands (Scotland) Act 2018. This omission inhibits the competent authority's legal obligation to assess the social, cultural, and economic implications for the island community, resulting in a failure to meet statutory requirements.

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

Collectively, the lack of assessment for living heritage, intangible cultural values, community rights, and adherence to statutory mandates leads to a substantial evidential gap. Consequently, the cultural impacts of the development have not been adequately evaluated, leaving the application insufficient for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The failure to disclose the full Social Impact Assessment is a critical issue that undermines the entire evaluation process. The competent authority is unable to conduct a thorough socio-economic and health assessment without access to this essential document, resulting in a significant material omission within the application. This lack of transparency not only contravenes the evidential requirements of the Environmental Impact Assessment regime but also hinders the ability to determine the true human and social costs associated with the proposed development.

Available summaries reveal that local residents are already grappling with measurable stress, anxiety, and concern due to the proposal’s scale and proximity. These impacts stem from direct engagement with the community, underscoring their significance. However, without the full assessment being made available for scrutiny, it is impossible

to fully grasp the implications of these findings within the decision-making framework.

Moreover, evidence indicates that the development is seen as a direct threat to community identity and cohesion, with “cultural loss” noted in the developer's own findings. Yet, these critical impacts have not been adequately integrated into the main application or given the weight they deserve. The withholding of the complete Social Impact Assessment thus obscures a comprehensive understanding of the social risks involved.

From a policy standpoint, the application fails to align with National Planning Framework 4 concerning health and wellbeing. The development must not only support positive health outcomes but also avoid causing harm. However, the evidence currently available points to existing adverse effects that remain undisclosed. This lack of clarity prevents any demonstration of compliance with the relevant policy.

The overall assessment of social impacts, health, and wellbeing is materially deficient and lacks the required transparency for a lawful evaluation. Consequently, the non-disclosure of the complete Social Impact Assessment, coupled with evidence of current adverse impacts, results in an incomplete and unreliable assessment, ultimately preventing a lawful determination and reinforcing the assertion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

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

Additionally, there is a lack of analysis concerning the interconnectedness of the landscape, seascape, and cultural heritage. Heritage sites like the Calanais Standing

Stones and other Scheduled Monuments are integral to the wider landscape, linked by visual and spatial relationships to the Atlantic horizon. Treating these sites as isolated entities disregards their interdependence, leading to an incomplete assessment of impacts on their setting and cultural importance.

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The assessment of risks related to construction and pollution is lacking and does not include the necessary detail to evaluate potential environmental effects. The project involves significant seabed preparation and installation activities in a high-energy Atlantic setting, but there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that would be prepared after consent, which hampers any meaningful assessment of their sufficiency or effectiveness.

This dependence on unspecified future measures raises particular concerns, especially considering the sensitivity of the environment. The West Lewis coastline features clean coastal waters and crucial habitats that are at risk of sediment disturbance and contamination. Although the application acknowledges risks like sediment mobilisation and accidental spills of chemicals or oil, it lacks adequate information on how these issues will be prevented, controlled, or monitored.

There is also ambiguity about the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. In the absence of thorough modelling and well-defined management strategies, it becomes impossible to

ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also pertains to potential effects on marine species and habitats already recognised as sensitive within the broader assessment.

The lack of detailed emergency response procedures further exacerbates these issues. By postponing contingency planning until after consent, the application obstructs the evaluation of whether suitable safeguards are in place to address pollution incidents. This introduces procedural risks and undermines the capability of the competent authority to assess environmental protection measures at the time of decision-making.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the demands of the Environmental Impact Assessment regime. It is necessary to evaluate likely significant effects and mitigation before consent, and without this information, a lawful determination cannot be achieved. Moreover, the application fails to show compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The evaluation of fisheries and marine life presented within the application is inadequate and does not facilitate a thorough understanding of ecological or socio-economic consequences. The waters off the West Lewis coast are home to a diverse marine ecosystem and host an active fishing industry, yet the application fails to substantiate that these activities and habitats can be protected or sustained without considerable disruption.

A critical concern is the presumption that fishing activity can be displaced without adverse effects. The application lacks evidence to support the claim that alternative fishing grounds are available, accessible, or capable of accommodating additional pressure. This gap is significant, as the risk of displacement could lead to overfishing in other areas and may have broader economic ramifications for the local fishing fleet. In the absence of a definitive and evidence-based evaluation, the implications for fisheries and livelihoods remain inadequately addressed.

Moreover, the proposal poses substantial risks to marine species, particularly due to the underwater noise resulting from construction activities. The use of high-energy hammer piling over prolonged periods is anticipated to cause disturbances across extensive distances, potentially impacting species such as dolphins. The predicted disturbance to a considerable portion of the local bottlenose dolphin population raises serious issues; however, the application appears to minimise the importance of these effects without adequate evidence to support such a position.

Inconsistencies within the application further complicate the assessment, as it acknowledges the necessity of licences to permit harm to European Protected Species while simultaneously characterising the impacts as negligible. This contradiction calls into question the reliability of the assessment and raises issues regarding adherence to the Habitats Regulations, particularly in instances where anticipated harm is significant enough to warrant legal authorisation.

The assessment also neglects to address cumulative impacts stemming from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough consideration of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not demonstrate compliance with 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 effects on marine biodiversity, thereby hindering the ability to conclude that the proposal aligns with the principles of sustainable development.

In summary, the deficiencies in the evidence regarding fishing displacement, the undervaluation of acoustic impacts, and the presence of internal contradictions render the assessment incomplete and untrustworthy. These shortcomings impede a robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal involves the construction of offshore turbines and associated onshore infrastructure, including cabling across protected moorland, a substation near Stornoway, and access routes through sensitive landscapes. However, the assessment of this onshore infrastructure is materially incomplete, failing to consider the full extent of impacts from what is essentially a single integrated project. The onshore works and offshore turbines are intrinsically linked yet evaluated separately, leading to a fragmented approach that obscures the true scale of environmental and socio-economic effects.

Significant risks arise to sensitive habitats, such as machair systems and peatland environments, which are protected under policy. The application does not adequately demonstrate that impacts on these habitats have been fully assessed or that suitable avoidance measures have been implemented. This results in a clear evidential gap regarding biodiversity protection. Furthermore, the disturbance of peatland during construction releases stored carbon, potentially generating a carbon debt that contradicts the aims of renewable energy development. The application lacks sufficient discussion on this issue and fails to show that the overall carbon balance remains beneficial.

By excluding or postponing the assessment of onshore impacts, the proposal hinders proper evaluation of cumulative effects. The Environmental Impact Assessment

process necessitates that all project components are considered together; however, the separation of offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities are not fully understood.

The routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights, and the application does not provide evidence that the necessary consents or processes have been initiated, which raises questions about deliverability and lawful implementation. Additionally, the failure to assess the project as a whole and demonstrate protection of peatlands, habitats, and land use interests conflicts with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further undermines the application.

Overall, the separation of project components, lack of comprehensive assessment, and insufficient 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 concerning dark skies and nocturnal wildlife within the Environmental Impact Assessment represents a critical gap. The West Lewis coastline boasts exceptionally dark skies, which are integral to its environmental quality, cultural identity, and tourism value. The proposed installation of permanent red aviation lighting, visible over long distances, would create a persistent and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

Significantly, the impact of this lighting on visual amenity, landscape character, and the experiences of residents and visitors has not been evaluated. This is particularly concerning given the importance of dark skies to the area's identity and the burgeoning tourism sectors, such as astro-tourism. The failure to consider these factors results in an evident gap in the overall landscape and environmental assessment.

More alarmingly, there has been no evaluation regarding 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 their phototactic responses, which can lead to disorientation and increased collision risks. The application lacks any lighting impact assessment or phototaxis study, failing to evaluate how aviation lighting might affect these species or potentially increase mortality rates.

This issue is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which neglects to account for nocturnal activity and related risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation due to artificial lighting, a risk that has yet to be assessed. The absence of site-specific night-time data creates a crucial deficit in understanding the ecological impacts.

Without a thorough assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would face adverse effects. The necessary standard of evidence to exclude adverse effects beyond reasonable scientific doubt cannot be satisfied, thus engaging the precautionary principle and obstructing a lawful determination.

From a policy standpoint, this omission conflicts with National Planning Framework 4 regarding the protection of natural spaces and environmental quality. It also undermines the comprehensive evaluation of landscape and seascape impacts, as the night-time character is an essential aspect of the environment.

Collectively, the absence of assessments concerning dark skies and nocturnal wildlife represents a substantial evidential gap. The lack of baseline data, impact modelling, and species-specific analysis leaves the application incomplete and unable to support a lawful determination.

TOURISM

The assessment of tourism impacts within the application is inadequate, particularly in relation to the economic and social consequences for a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. Despite acknowledging that 86% of visitors are attracted by the scenery, the application lacks a quantitative analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism has seen substantial growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. However, the application does not examine how the industrialisation of the seascape and degradation of environmental quality would affect Tourism Gross Value Added or the broader economic resilience of the area. Without this analysis, it is impossible to ascertain whether the development would bring a net economic benefit or jeopardise an established and thriving sector.

Furthermore, the assessment neglects to consider how environmental quality supports tourism, overlooking the significance of unspoiled landscapes and dark skies for visitor experiences and emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this deficiency, leaving a critical gap in understanding the impacts on a recognised and growing segment of the local economy.

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

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, particularly concerning economic impact and the requirement for showing net benefit. It also contradicts strategic objectives that position tourism as a priority growth sector and fails to present adequate evidence for the competent authority to assess the economic ramifications of the proposal.

In summary, the lack of quantification regarding tourism impacts, the omission of analyses on environmental influences on visitor behaviour, and the disregard for the island's economic dependency culminate in a significant evidential shortfall. This gap hinders a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements for sustainable development when evaluated against national policy, evidential standards, and statutory duties. This application revisits the core issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was identified. Presenting the proposal under a more robust policy framework does not rectify these concerns, particularly regarding biodiversity, peatland protection, landscape integrity, and community wellbeing.

The evidential basis for this application is neither complete nor reliable. Critical gaps exist in baseline data, and there is an undefined design envelope. The proposal relies on unspecified mitigation measures and omits important impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, preventing a comprehensive understanding of the likely significant effects and residual impacts.

Additionally, there are clear procedural shortcomings. The lack of a compliant Island Communities Impact Assessment breaches statutory duties under the Islands (Scotland) Act 2018, while the failure to disclose a full Social Impact Assessment represents a significant 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.

The proposal is at odds with the National Planning Framework 4, as it does not adequately protect 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, particularly due to the absence of tourism impact modelling. Furthermore, the cumulative effects of both offshore and onshore elements have not been properly assessed, obscuring impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertainties regarding environmental risks remain significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The evidential threshold needed to exclude adverse effects

beyond reasonable scientific doubt has not been reached, thus engaging the precautionary principle and preventing a lawful determination of acceptable 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 detrimental effects on tourism represent permanent impacts that cannot be adequately mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The substantial information deficiencies, alongside policy conflicts and unresolved environmental risks, preclude a lawful and evidence-based decision. The competent authority must refuse consent based on these grounds or invoke regulatory provisions to mandate 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

I feel it would be a negative move for the community as well as my above points.

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: FCD112EE

Member of the public 1344

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

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report fails to provide a complete and reliable account of the likely environmental effects of the proposal. Significant uncertainty arises from the use of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations. This lack of commitment prevents a consistent application of a worst-case scenario, compromising the integrity of the assessment. As a result, the impacts outlined may not accurately reflect the development that is ultimately built, limiting both public understanding and the competent authority's ability to grasp the true extent of environmental effects.

The application places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent based on the premise that environmental harm will be addressed later inhibits any meaningful evaluation of effectiveness or assessment of residual impacts. This deferral of critical information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which necessitates a clear establishment of likely significant effects and mitigation prior to determination.

There are also substantial evidential gaps present, including inadequacies in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. Such deficiencies generate uncertainty regarding the scale and significance of impacts, especially in instances where negligible or non-significant effects are concluded without robust supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that cannot align with statutory requirements.

Consequently, the application does not meet the evidential threshold needed under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, as it fails to show that impacts have been fully assessed or that adequate safeguards are in place.

Overall, the combination of an undefined design envelope, the absence of specified mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings preclude a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make a determination based on the information presented.

ASSESSMENT OF ALTERNATIVES

The application fails to demonstrate compliance with the statutory requirements of the Environmental Impact Assessment regime due to an inadequate assessment of alternatives. Instead of providing a reasoned comparison of realistic alternatives based on their environmental effects, the application offers a narrative regarding project evolution. This approach does not substantiate that less harmful options have been properly identified, assessed, and selected over more damaging alternatives.

Moreover, there is a lack of a transparent, evidence-based comparison of alternative offshore locations, development scales, or design configurations. Notably, the application does not indicate that the developer has seriously considered the option of placing turbines further offshore, an action that would likely mitigate visual, ecological, and coastal impacts. Considering the sensitivity of the West Lewis coastline and the critical role of proximity to shore in determining impact, the failure to conduct such an analysis precludes any determination that the proposed siting represents the least damaging option.

This inadequacy further extends to cable routing and landfall assessment, where there is insufficient evidence that alternative routes have been explored to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The absence of a clear avoidance strategy and the lack of comparative analysis suggest that mitigation by design has not been adequately applied, with an overreliance on post-design mitigation measures instead.

Consequently, the application does not satisfactorily demonstrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This deficiency signifies a failure to adhere to the established mitigation hierarchy, preventing the competent authority from determining whether less harmful and more suitable alternatives may exist. Without a comprehensive assessment of alternatives, it cannot be concluded that the proposal is sustainable or compliant with relevant policies.

From a policy standpoint, this shortfall undermines adherence to the National Planning Framework 4, particularly in its aims to protect natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment constitutes a material omission that contributes to the overall conclusion that the application has not undergone adequate assessment and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The application fails to meet the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it inadequately identifies and assesses protected species. The assessment of marine ecology and protected species presents significant deficiencies, particularly concerning the understanding of ecological receptors within the West Lewis coastal environment. This area represents a highly sensitive and biologically active marine system, yet the baseline data remains incomplete, and the methodologies employed do not sufficiently capture species presence, behaviour, and habitat use. Consequently, the conclusions drawn lack a sound evidential basis for evaluating potential impacts.

A notable shortcoming pertains to otters, classified as a European Protected Species, where the application does not adequately acknowledge their active use of coastal areas for foraging and movement. The failure to consider their core foraging range and behavioural patterns results in an inadequate assessment of the potential impacts of

construction disturbance, noise, and increased activity. This oversight undermines any conclusions regarding the absence of significant effects on this species.

Furthermore, the assessment of basking sharks reveals additional deficiencies, as reliance on aerial surveys introduces considerable detection bias, particularly in Atlantic conditions. This methodological approach is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations indicating frequent use of these waters. The omission of relevant data further contributes to an incomplete baseline, weakening the reliability of the conclusions presented.

These methodological limitations result in assessments of negligible or non-significant effects being based on assumptions rather than robust evidence. The lack of sufficient baseline data hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions, thus generating uncertainty regarding the true scale of risk to marine species and habitats.

Overall, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions compromises the reliability of the assessment. These shortcomings inhibit a thorough evaluation of impacts on marine ecology and protected species, ultimately leading to the conclusion that the application does not possess a sufficient evidential foundation. In light of the uncertainty introduced, it cannot be reasonably concluded that adverse effects can be excluded beyond reasonable scientific doubt, thereby engaging the precautionary principle and indicating that consent cannot be lawfully granted.

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 proposed development fails to adequately assess cultural heritage and community identity, particularly regarding the West Lewis coastline, which is a vibrant cultural landscape where environment, language, tradition, and community are interconnected. The application adopts a simplistic view, treating heritage as isolated, static features rather than acknowledging their ongoing social, cultural, and spiritual significance within the community.

There is a notable deficiency in the treatment of culturally significant sites, specifically the active burial grounds at Dalmore, Bragar, and Barvas. These places serve as essential locations for burial and spiritual practice, yet the assessment considers them as static elements, neglecting their ongoing use and the implications of development on their surroundings. This mischaracterisation leads to an incomplete evaluation of cultural impacts and overlooks their vital role in community life.

Moreover, the application neglects to evaluate intangible cultural heritage, such as the Gaelic language and local traditions, which are integral to the area's identity. This significant omission hampers the understanding of the cultural impact of the development. The lack of assessment of these vital cultural elements further diminishes the validity of the evaluation.

Concerns also arise regarding community rights and engagement, particularly for the

Gaelic-speaking population, which embodies a distinct cultural identity characteristic of an Indigenous People. The absence of a Free, Prior and Informed Consent process undermines the integrity of the assessment, failing to meet established principles of community participation in decisions that affect cultural and environmental interests.

A critical procedural failure is the lack of a compliant Island Communities Impact Assessment, a legal 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 effects on the island community, rendering a lawful determination impossible.

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal poses a significant threat to community identity and cohesion, as highlighted by the findings of the developer's own research, which identified "cultural loss." However, these impacts have not been adequately incorporated into the main application or afforded the necessary consideration. The absence of the full Social Impact Assessment conceals the genuine human and social costs associated with the development.

Furthermore, the assessment of social impacts, health, and wellbeing is materially deficient, lacking the transparency required 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 public. This omission creates a substantial evidential gap, hindering both public understanding and the competent authority's capacity to grasp the full extent of social risks identified through the developer's own work.

Available summaries reveal that residents are currently facing measurable stress, anxiety, and concern related to the scale and proximity of the proposal. These impacts are based on direct engagement with the community and are not speculative in nature. However, the failure to disclose the full assessment obstructs proper scrutiny of these findings and restricts the ability to evaluate their significance within the decision-making process.

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 harm. Yet, the evidence available suggests existing adverse effects that have not been fully revealed. Without access to the complete assessment, it is impossible to ascertain compliance with this policy.

Moreover, the lack of transparency undermines the Environmental Impact Assessment process. It is crucial to have a comprehensive understanding of social, economic, and health impacts for developments of this magnitude, particularly when community character and functioning may be at stake. The failure to provide the full dataset results in an application that does not present a complete evidential basis for assessing the balance between benefits and harm.

The procedural implications of these deficiencies are considerable. The competent authority is unable to conduct a robust socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This situation represents a material omission within the application and a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

Taken together, the withholding of the full Social Impact Assessment, alongside evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This ultimately prevents a lawful determination and reinforces the conclusion that the application is not supported by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

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

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

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

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

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

In summary, the assessment inadequately represents the scale of the impacts, the sensitivity of the environment, and the interrelated nature of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application lacks crucial details needed to assess the risks associated with construction and pollution. It includes substantial seabed preparation and installation in a high-energy Atlantic setting, yet it does not provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it depends on mitigation and contingency measures to be created after consent, which hinders any meaningful evaluation of their adequacy and effectiveness.

This reliance on unspecified future measures raises concerns about the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are at risk from sediment disturbance and contamination. Although the application acknowledges potential risks, such as sediment mobilisation and accidental chemical or oil spills, it lacks sufficient information on prevention,

control, or monitoring strategies.

There is significant uncertainty regarding the size and behaviour of sediment plumes resulting from seabed disturbances and cable installation. Without robust modelling and well-defined management strategies, it is impossible to assess the extent, duration, or ecological effects of these impacts. This uncertainty also extends to effects on marine species and habitats that have been identified as sensitive in the broader assessment.

Moreover, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application restricts the evaluation of whether adequate safeguards are available to manage pollution incidents. This introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures at the time of decision-making.

From a regulatory standpoint, delaying essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be assessed before consent is granted, and the absence of this information means that a lawful determination cannot be made. The application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the deficiencies in defined mitigation measures, detailed management plans, and clarity on potential impacts render the assessment materially inadequate. These issues prevent a comprehensive evaluation of construction and pollution risks and further indicate that the application is incomplete.

FISHERIES AND MARINE LIFE

The evaluation of fisheries and marine life is inadequate, lacking a thorough assessment of ecological and socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry, but the application does not show that these habitats and activities can be preserved without significant disruption.

A major concern is the presumption that fishing activities can be moved elsewhere without repercussions. The application fails to provide evidence that alternative fishing grounds are available or capable of handling increased pressure. This gap is crucial, as displacement could lead to overfishing in other areas and might have broader economic implications for the local fishing fleet. Without a detailed and evidence-based evaluation, the effects on fisheries and local livelihoods remain unclear.

The proposal presents considerable risks to marine species, primarily due to the underwater noise produced during construction. Extended high-energy hammer piling is expected to disturb marine life over large distances, impacting species such as dolphins. The predicted disruption to a significant portion of the local bottlenose

dolphin population is alarming; however, the application minimises these effects without adequate evidence.

Moreover, there is an inconsistency in the application regarding the necessity for licences to allow harm to European Protected Species, while simultaneously describing these impacts as negligible. This contradiction questions the reliability of the assessment and raises issues concerning compliance with the Habitats Regulations, especially when harm is anticipated to an extent that requires legal permission.

The assessment does not adequately address cumulative impacts from various pressures, such as habitat disturbance, noise, and fishing displacement. Without a thorough analysis of these combined factors, the overall effects on marine ecosystems and socio-economic conditions remain uncertain.

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

Overall, the deficiencies in evidence regarding fishing displacement, the minimisation of acoustic impacts, and inconsistencies throughout the application result in an incomplete and unreliable assessment. These shortcomings hinder a robust understanding of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed development involves significant onshore infrastructure linked to offshore turbines, yet the assessment fails to adequately evaluate the full range of impacts as it treats these components separately. This fragmented approach obscures the true scale of the environmental and socio-economic effects that arise from what constitutes a single integrated project.

Integral to the onshore works are the cabling across protected moorland, the construction of a substation near Stornoway, and the associated access infrastructure that passes through sensitive landscapes. Excavation across areas of deep peat, particularly within Barvas Moor, is planned despite its significance as a carbon store and ecologically sensitive habitat. The application lacks a comprehensive assessment of these impacts, which is essential for understanding the project's overall environmental footprint.

Furthermore, the exclusion or deferral of assessing onshore impacts compromises the evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered in unison; however, the distinct assessment of offshore and onshore elements fails to account for the combined impacts on peatlands, habitats, and local communities. This separation raises concerns regarding sensitive habitats, including machair systems and peatland

environments that are already protected by policy. The application does not adequately demonstrate that the impacts on these habitats have been fully assessed or that appropriate avoidance measures are in place, resulting in a significant evidential gap concerning biodiversity protection.

There are also serious implications for carbon balance. Disturbing peatland releases stored carbon, which could lead to a carbon debt that contradicts the intended benefits of renewable energy development. The application does not sufficiently address this issue nor show that the overall carbon balance remains advantageous.

Additionally, routing infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. The lack of evidence that necessary consents or processes have been initiated raises further questions about the deliverability and lawful implementation of the project.

From a policy standpoint, the inadequate assessment of the project as a whole and the failure to protect peatlands, habitats, and land use interests contradict the National Marine Plan and National Planning Framework 4. This inability to demonstrate that impacts can be avoided or mitigated severely undermines the application.

In summary, the division of project components, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts make this portion of the application incomplete and unreliable, thus hindering lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The application fails to assess the impacts on nocturnal wildlife, which is a critical oversight. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are notably sensitive to artificial lighting, as it can lead to disorientation and an increased risk of collision. There is no lighting impact assessment or phototaxis study included in the proposal, which means it does not evaluate how the introduction of aviation lighting may affect these species or contribute to increased mortality rates.

Furthermore, reliance on daytime survey data in the ornithological assessment neglects nocturnal activity and the associated risks. Kittiwakes, which may forage or migrate at night, are similarly vulnerable to disorientation caused by artificial lighting, yet this potential risk has not been investigated. The lack of specific night-time data leaves a significant gap in understanding the ecological impacts that may arise.

The proposal introduces permanent red aviation lighting, which would be visible over long distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon. This change would fundamentally alter the night-time environment and is not assessed for its impact on visual amenity, landscape character, or the experiences of residents and visitors. Given the West Lewis coastline's exceptionally dark skies, which are integral to its environmental quality, cultural identity, and tourism value, this omission is substantial.

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

From a policy standpoint, the lack of assessment conflicts with National Planning Framework 4 regarding the protection of natural places and environmental quality. It also undermines the comprehensive evaluation of landscape and seascape impacts, as the night-time character is a vital component of the environment. Collectively, the failure to consider dark skies and nocturnal wildlife creates 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.

TOURISM

The assessment of tourism impacts is lacking and does not adequately evaluate the economic and social consequences for a critical sector of the Isle of Lewis economy. With tourism significantly reliant on the region's wild coastline, nearly untouched landscape, dark skies, and sense of remoteness, the application notes that 86% of visitors are attracted by the scenery. However, it fails to provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or overall economic contributions.

Tourism has seen remarkable growth, rising from £65 million in 2017 to more than £81.5 million, supporting over 1,000 jobs and accounting for up to 16% of the island's economy. Nevertheless, the application does not model the potential impact of the industrialisation of the seascape and the loss of environmental quality on Tourism Gross Value Added or broader economic resilience. Without such analysis, it remains uncertain whether the development could offer a net economic benefit or jeopardise an established and expanding sector.

The failure to consider the role of environmental quality in supporting tourism is particularly concerning, as unspoiled landscapes and dark skies are crucial to enhancing visitor experience and fostering emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further deepens this deficiency, resulting in a substantial gap in understanding the impacts on a recognised and expanding part of the local economy.

In an island community with limited economic diversification, the oversight in assessing tourism impacts holds broader implications for employment, local businesses, and community sustainability. Additionally, the absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been evaluated as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with

National Planning Framework 4, especially concerning economic impact and the necessity to show net benefits. It also contradicts strategic objectives that highlight tourism as a priority growth sector and lacks sufficient evidence to enable the competent authority to assess the economic ramifications of the proposal.

Collectively, the failure to quantify tourism impacts, evaluate environmental drivers of visitor behaviour, and acknowledge the island's economic dependency creates a significant evidential gap. This deficiency obstructs a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates a significant failure to meet the standards required for sustainable development, particularly when evaluated against statutory responsibilities, national policy, and evidential requirements. It echoes the central concerns that led to the rejection of the Lewis Wind Power proposal in 2008, wherein the extent of industrialisation was deemed unacceptable. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland conservation, landscape integrity, and community welfare, the application falls short.

Critical deficiencies plague the evidential basis for the proposal, revealing gaps in baseline data and the continued utilisation of an undefined design envelope. Furthermore, it relies on unspecified mitigation measures and neglects to address key impact pathways, including those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism. As a result, the Environmental Impact Assessment is incomplete, failing to provide a thorough understanding of potential significant effects or residual impacts.

Procedural inadequacies are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory requirements under the Islands (Scotland) Act 2018. Additionally, the failure to fully disclose the Social Impact Assessment represents a material omission. Such shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

In direct contradiction to National Planning Framework 4, the proposal does not adequately demonstrate protection of biodiversity, natural habitats, and cultural heritage. It fails to verify that health and wellbeing impacts are acceptable and lacks evidence of net economic benefits due to the absence of tourism impact modelling. The cumulative impacts associated with both offshore and onshore elements have not been thoroughly assessed, obscuring their effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain ambiguous and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in places. The evidential threshold required to dismiss

adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

Moreover, the proposal is poised to bring about considerable and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruptions to cultural and visual relationships, and the impacts on tourism represent enduring effects that cannot be sufficiently mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The array of information deficiencies, coupled with conflicts in policy and unresolved environmental risks, obstructs a lawful, evidence-based decision. The competent authority must either reject consent on these grounds or invoke the necessary regulatory provisions to compel the submission of the outstanding information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 230DC0C3

Member of the public 1345

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under relevant marine licensing and Environmental Impact Assessment regimes. The proposal is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, rich cultural identity, and near-pristine environment. The scale and design of this application raise serious concerns regarding its adherence to statutory requirements, national policy, and sustainable development principles.

A thorough examination of the Environmental Impact Assessment Report and associated documentation reveals that critical environmental data is missing, and baseline information is both limited and inconsistent. Key aspects of the proposal are not clearly defined, and the flexible design framework leaves uncertainty regarding potential significant effects. Furthermore, the reliance on unspecified mitigation measures makes it impossible to assess their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, making claims of negligible or non-significant effects unsupported by robust evidence.

There are substantial policy conflicts present as well. The application 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. It does not demonstrate compliance with national obligations to protect biodiversity, climate interests, and environmental integrity. These conflicts directly undermine the statutory tests necessary for consent and challenge the competent authority's ability to determine that the development is acceptable from a policy perspective.

Given the unprecedented scale of the proposal, with large turbines positioned close to the shoreline, there are significant concerns about 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 circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is incomplete and lacks a full, transparent, and reliable depiction of the anticipated environmental effects of the proposal. The introduction of a flexible Project Design Envelope, which does not

commit to specific turbine dimensions, layouts, or configurations, creates substantial uncertainty and obstructs the application of a worst-case scenario. This compromises the integrity of the assessment, rendering the impacts presented potentially inconsistent with the actual development, thus hindering both public understanding and the competent authority's comprehension of the true environmental repercussions.

Consent is requested with a reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Such an approach results in environmental harm being addressed post-consent, thereby obstructing a meaningful evaluation of effectiveness and the assessment of residual impacts. This postponement of vital information to stages following consent is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies be clearly identified prior to determination.

Moreover, the application is characterised by significant evidential shortcomings, including gaps in baseline data, methodological limitations, and a dependency on assumptions rather than site-specific evidence. This leads to uncertainty concerning the magnitude and significance of impacts, particularly where conclusions are drawn indicating negligible or non-significant effects without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot align with statutory requirements.

Consequently, the application does not satisfy the evidential threshold mandated under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate adherence to National Planning Framework 4, including stipulations related to biodiversity protection and environmental integrity, as it is unsubstantiated that impacts have been comprehensively assessed or that suitable safeguards are established.

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

ASSESSMENT OF ALTERNATIVES

The application fails to demonstrate that environmental harm has been minimised through appropriate site selection, layout, and routing of infrastructure. This indicates a significant oversight in following the established mitigation hierarchy. Consequently, the competent authority is left without a clear understanding of whether less harmful

and more suitable alternatives could be viable. The assessment of alternatives is fundamentally inadequate and does not fulfil the statutory requirements set by the Environmental Impact Assessment regime. Instead of delivering a structured, reasoned comparison of feasible alternatives based on their environmental impacts, the application merely offers a narrative of project development. This flawed approach does not adequately illustrate that less damaging options have been effectively identified, evaluated, and preferred over more harmful solutions.

Moreover, the application provides no transparent, evidence-based comparison of different offshore locations, scales of development, or design configurations. Notably, it fails to show that the developer has genuinely considered placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be less severe. The sensitivity of the West Lewis coastline, along with the critical importance of proximity to shore in assessing impact, means that the lack of such analysis makes it impossible to ascertain that the proposed siting is the least damaging option available.

The shortcomings are also apparent in the evaluation of cable routing and landfall assessment, which lack sufficient evidence that alternative routes have been explored to minimise impacts on sensitive receptors. This oversight includes locations of cultural and spiritual significance, such as Barvas Cemetery. The absence of a clear strategy for avoidance and the failure to conduct comparative analysis suggest that mitigation by design has not been considered, leading to reliance on measures that would come after the design phase.

From a policy standpoint, these deficiencies hinder compliance with National Planning Framework 4, especially concerning the protection of natural spaces, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment constitutes a material omission, reinforcing the overall conclusion that the application has not been sufficiently assessed and cannot support a lawful decision.

MARINE ECOLOGY AND PROTECTED SPECIES

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

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

There are also shortcomings in the assessment of basking sharks, as the reliance on

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application has significant flaws in its ornithological assessment, which presents major gaps in evidence and inconsistencies that undermine its findings. The Isle of Lewis's west coast is home to internationally important seabird populations, many of which are already declining. However, the application fails to convincingly show that these species will not be negatively impacted. The development site is situated within critical foraging areas and migratory routes, yet the assessment does not thoroughly consider the risks of displacement, collision, or habitat loss.

There is a notable contradiction within the application. The developer claims that there are no significant adverse effects while also putting forward a Habitats Regulations derogation case, which is typically necessary when significant harm is anticipated. This inconsistency raises doubts about the assessment's reliability and suggests that its conclusions are not adequately backed by the evidence provided.

Furthermore, the assessment lacks sufficient proof that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unharmed. The importance of these feeding grounds is not fully addressed, and the reliance on modelling introduces uncertainty, especially for species like Kittiwakes and Fulmars that are in serious decline. The methodologies used are likely to underestimate mortality, particularly given incomplete baseline data and a lack of understanding of

behavioural responses.

The placement of turbines in a recognised migratory corridor adds another serious risk, creating a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The application does not properly evaluate the long-term consequences of ongoing mortality in this corridor or the potential impacts on species with relatively small global populations.

Regulatory compliance is also questionable, as the application does not meet the evidential standard required to assert that there will be no adverse effect on the integrity of protected sites. The contradictory conclusions, combined with data deficiencies and modelling constraints, indicate that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and inhibits a lawful decision in favour of consent.

Overall, the deficiencies identified reflect a failure to comply with the National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected puts the proposal at odds with national policy. These issues collectively render the assessment unreliable due to inconsistencies, methodological flaws, and insufficient evidence, ultimately leading to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity presents significant inadequacies, failing to acknowledge the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are interconnected. Rather than recognising these elements, the application adopts a reductive framework that treats heritage as a collection of isolated, static assets, neglecting their ongoing social, cultural, and spiritual functions within the community.

A notable shortcoming pertains to culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, which are active burial grounds and places of spiritual significance. However, the assessment inaccurately categorises these sites 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 dismisses their integral role in community life.

The evaluation fails to encompass intangible cultural heritage elements, including the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These components are vital to the area's identity but are wholly omitted from the assessment, representing a critical gap. The absence of these considerations prevents an accurate understanding of the development's cultural impact.

Concerns extend to community rights and engagement, particularly regarding the

Gaelic-speaking population, which embodies a distinct cultural identity with characteristics of an Indigenous People. The lack of a process for Free, Prior and Informed Consent severely undermines the legitimacy of the assessment, neglecting established principles of participation in matters affecting cultural and environmental interests.

Furthermore, a significant procedural failure is the omission of a compliant Island Communities Impact Assessment, a legal requirement under the Islands (Scotland) Act 2018. In the absence of this assessment, the competent authority is unable to fulfil its statutory obligations to evaluate the social, cultural, and economic impacts on the island community. This deficiency alone precludes a lawful determination.

From a policy standpoint, the outlined deficiencies 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 the failure to recognise living cultural practices, constitutes a clear deviation from established policy requirements.

In summary, the failure to adequately assess living heritage, intangible cultural value, community rights, and statutory obligations leads to a considerable evidential gap. The cultural impacts of the development have not been thoroughly examined, and the application lacks a sound basis for determining the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the assessment of social impacts, health, and wellbeing is a critical concern that undermines the entire evaluation process for this application. While the developer commissioned a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This significant evidential gap hinders both public understanding and the competent authority’s ability to gauge the full scope of social risks identified through the developer’s own research.

Summaries available indicate that residents are currently facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These documented impacts stem from direct engagement with the community and are therefore grounded in reality rather than speculation. The failure to release the complete assessment restricts proper scrutiny of these findings and obstructs the determination of their significance in the decision-making process.

There is also a perception among the community that the proposal poses a direct threat to their identity and cohesion, with "cultural loss" highlighted in the developer's own findings. Despite this, the potential impacts have not been adequately incorporated into the main application or given the necessary consideration. The withholding of the full Social Impact Assessment conceals the genuine human and social costs associated with the development.

The implications of this lack of transparency extend to the Environmental Impact Assessment process as well. A comprehensive understanding of the social, economic, and health impacts is vital for developments of this magnitude, especially where community character and functioning are concerned. By failing to provide the complete dataset, the application lacks a thorough evidential foundation for weighing benefits against potential harm.

From a policy standpoint, the application does not satisfy the requirements outlined in National Planning Framework 4 regarding health and wellbeing. Developments should promote positive health outcomes and mitigate harm; however, the existing evidence suggests that adverse effects have not been fully disclosed. Without the full assessment, the application cannot demonstrate compliance with this policy.

The procedural ramifications are significant as well. The competent authority is unable to conduct a robust socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a material omission in the application and a failure to satisfy the evidential standards demanded by the Environmental Impact Assessment regime.

In conclusion, the combination of non-disclosure of the full Social Impact Assessment and evidence of existing adverse impacts leads to an incomplete and unreliable evaluation. This situation obstructs a lawful determination and reinforces the assertion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts 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 application presents significant deficiencies in its assessment of construction and pollution risks, leading to an incomplete understanding of potential environmental effects. It involves considerable seabed preparation and installation works within a high-energy Atlantic environment, yet fails to provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on post-consent mitigation and contingency measures, which prevents any thorough evaluation of their adequacy or effectiveness.

Given the sensitivity of the receiving environment, this reliance on undefined future measures raises serious concerns. The West Lewis coastline is home to clean coastal waters and important habitats that are at risk of sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental spills of chemicals or oil, it lacks sufficient detail on the

prevention, control, or monitoring of these risks.

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

Compounding these issues is the absence of detailed emergency response procedures. The deferral of contingency planning to a post-consent stage hinders the evaluation of whether adequate safeguards are in place to address pollution events. This introduces procedural risks and diminishes the competent authority's ability to assess environmental protection measures effectively at the determination stage.

From a regulatory standpoint, the deferral of essential environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation measures must be evaluated prior to consent, and the absence of such information means a lawful determination cannot be achieved. The application also fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, insufficient detailed management plans, and uncertainty regarding potential impacts result in a materially deficient assessment. These shortcomings obstruct a comprehensive evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application raises significant concerns regarding its evaluation of marine life and fisheries, revealing a lack of robust assessment of both ecological and socio-economic impacts. The waters off the West Lewis coast host a vibrant marine ecosystem alongside an active fishing industry, yet there is no evidence provided to assure that these critical habitats and activities can be protected from substantial disruption.

A notable flaw is the assumption that fishing activities can be displaced without repercussions. The application fails to demonstrate the availability or accessibility of alternative fishing grounds that could handle any additional pressures resulting from displacement. This lack of evidence is critical as it opens the door to potential overfishing in other areas, posing economic risks for the local fishing fleet. The impacts on livelihoods and fisheries remain inadequately understood due to the absence of a clear, evidence-based evaluation.

Moreover, the proposal presents considerable risks to marine species, particularly from construction-related underwater noise. The anticipated high-energy hammer piling over a prolonged duration is likely to create disturbances that reach significant distances, adversely affecting species such as dolphins. The expected impact on a substantial

portion of the local bottlenose dolphin population raises serious concerns; yet, the application minimises the significance of these effects, lacking adequate supporting evidence.

Inconsistencies within the application further undermine its credibility. While it acknowledges the need for licences to permit harm to European Protected Species, it simultaneously describes those impacts as negligible. This contradiction raises alarming questions about compliance with the Habitats Regulations, especially where anticipated harm could necessitate legal authorisation.

The assessment inadequately considers cumulative impacts that arise 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 does not comply with the National Planning Framework 4 or the National Marine Plan. It fails to demonstrate that the development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, which obstructs any conclusion that the proposal embodies sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal raises several concerns regarding the integrity of its environmental assessments. The assessment of onshore infrastructure is incomplete, failing to consider the full impacts of what is a single integrated project. The offshore turbines and onshore works are linked, yet they are evaluated separately, leading to a fragmented approach that obscures the overall environmental and socio-economic effects.

Significant risks to sensitive habitats are evident. The onshore elements include cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, particularly in Barvas Moor, a critical carbon store and ecologically sensitive habitat. The lack of a comprehensive impact assessment prevents a thorough understanding of the project's environmental footprint.

Moreover, the application does not adequately address the carbon balance. Disturbing peatland releases stored carbon, which may create a carbon debt that contradicts renewable energy objectives. The proposal has not shown that the overall carbon balance remains beneficial.

In addition, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application lacks evidence that necessary consents or processes have been initiated, raising concerns about deliverability and lawful implementation.

From a policy perspective, the failure to assess the project as a whole and to demonstrate the protection of peatlands, habitats, and land use interests is at odds with the National Marine Plan and National Planning Framework 4. The separation of offshore and onshore elements leads to a failure in evaluating cumulative effects, meaning that the combined impacts on peatlands, habitats, and communities are not fully understood.

Taken together, these issues indicate a significant evidential gap regarding biodiversity protection and overall environmental impacts. The separation of project components, absence of comprehensive assessment, and lack of evidence on land use impacts render this part of the application incomplete and unreliable, preventing lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposed application introduces permanent red aviation lighting that will be visible over long distances, leading to a continuous and intrusive “wall of light” effect across the western horizon. This change fundamentally alters the night-time environment, yet the assessment of dark skies and nocturnal wildlife is entirely absent from the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which contribute significantly to environmental quality, cultural identity, and tourism value. The failure to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of residents and visitors is a substantial omission, particularly given the importance of dark skies to the area’s identity and its emerging tourism sectors, such as astro-tourism.

Moreover, the application neglects to assess how the proposed lighting may affect nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are known to be highly sensitive to artificial lighting due to phototaxis, which can cause disorientation and increase collision risks. The absence of a lighting impact assessment or phototaxis study means that there is no evaluation of how aviation lighting might influence these species or lead to increased mortality. This gap is exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activity or the associated risks. Kittiwakes, which may forage or migrate at night, are also vulnerable to disorientation from artificial lighting, yet this risk has not been addressed. The lack of site-specific night-time data creates a critical deficiency in understanding the ecological impacts of the proposed development.

Without 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 exclude adverse effects beyond reasonable scientific doubt cannot be achieved, invoking the precautionary principle and hindering a lawful determination. From a policy standpoint, these omissions are inconsistent with National Planning Framework 4 regarding the protection of natural places and environmental quality. Additionally, this failure undermines the comprehensive assessment of landscape and seascape impacts, as the character of night-time environments is integral to the overall ecological context.

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

TOURISM

The evaluation of tourism impacts presented in the application is notably inadequate, omitting critical insights into the economic and social ramifications for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. Although it is acknowledged that 86% of visitors are attracted by the scenery, the application fails to provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of tourism.

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

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

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

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, especially regarding economic impact and the necessity to show net benefits. It also runs counter to strategic objectives that prioritise tourism as a

growth sector, and insufficient evidence is presented for the competent authority to assess the economic consequences of the proposal.

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

SUMMARY

The 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.

Additional Comments

I feel the turbines are too big & too close to shore

The island infrastructure isn't built to cope with influx of people required to build this project.

There are many environmental risks the project is going to cause, polluting the skies at day & night with lighting, polluting the waters around the turbines & releasing carbon from peatlands will all have negative effects.

I don't feel the community benefit on offer are anywhere near sufficient for the loss of the natural beauty of our islands being destroyed. Loss of income to local business from tourism will also be affected.

Although local company's will benefit short term whilst the project is being built, long term all maintenance contracts will be sub contracted to mainland firms with little or no jobs for local people.

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: C564BDC4

Member of the public 1346

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 within the relevant marine licensing and Environmental Impact Assessment frameworks. The development is situated off the west side of the Isle of Lewis, an area known for its stunning Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. Concerns regarding the scale, proximity, and design of the proposal highlight its incompatibility with statutory requirements, national policy, and the principles of sustainable development.

The application presents significant deficiencies, particularly an inadequate evidential basis for lawful determination. Key environmental data is notably absent, while baseline information remains limited and inconsistent. Furthermore, many aspects of the proposal are not clearly defined. The use of a flexible design framework obscures a comprehensive understanding of the potential significant effects, and the reliance on unspecified mitigation measures renders their effectiveness impossible to evaluate. Consequently, the documentation falls short of providing a complete understanding of environmental, cultural, or community impacts, leaving claims of negligible or non-significant effects unsupported by credible evidence.

Substantial policy conflicts are evident, as the proposal appears at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, cultural heritage, natural places, and health and wellbeing. It does not sufficiently demonstrate that national obligations to safeguard biodiversity, climate interests, and environmental integrity are achievable. These discrepancies directly challenge the statutory tests necessary for consent, undermining the competent authority's capacity to deem the development acceptable according to policy standards.

The unprecedented scale of the proposal, with large turbines positioned in close proximity to the shoreline, raises significant worries about landscape capacity, visual dominance, and environmental consequences. Collectively, the insufficient information, reliance on undefined mitigation measures, evidential deficiencies, and clear non-compliance with policy indicate that the application is incomplete and cannot support a lawful determination. Under these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally inadequate, failing to deliver a comprehensive, transparent, and reliable evaluation of the proposed project's environmental consequences. The incorporation of a flexible Project Design Envelope,

lacking definitive turbine dimensions, layouts, or configurations, creates considerable uncertainty, obstructing a consistent application of a worst-case scenario. This severely compromises the integrity of the assessment, obscuring the actual environmental impacts of the development, and depriving both the public and the competent authority of a clear understanding of the potential effects.

Consent is sought based on the premise that environmental harm will be mitigated at a later date, which is procedurally unacceptable. The proposal leans heavily on unspecified mitigation measures, monitoring strategies, and management plans that are yet to be defined. This deferral of critical information to post-consent phases undermines the principles of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be clearly established before any determination is made.

Significant evidential shortcomings further complicate the situation, including gaps in baseline data and methodological limitations. Reliance on assumptions rather than site-specific evidence results in ambiguity concerning the scale and significance of impacts. The conclusions drawn, particularly those indicating negligible or non-significant effects, lack robust supporting data. This deficiency hampers the ability to assess cumulative and worst-case impacts and introduces scientific uncertainties that cannot align with statutory obligations.

The application consequently fails to meet the evidential threshold necessary under the Habitats Regulations, which is essential to exclude adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, especially regarding protected species and sensitive habitats. Furthermore, the proposal does not demonstrate adherence to 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 adequate safeguards are in place.

In summary, the dependence on an unspecified design envelope, the lack of defined mitigation strategies, and significant gaps in baseline data collectively render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies obstruct a lawful and robust evaluation of environmental effects, placing the competent authority in a position where it cannot adequately determine the application based on the information at hand.

MARINE ECOLOGY AND PROTECTED SPECIES

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

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

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application is situated within key foraging areas and migratory pathways crucial for internationally important seabird populations along the west coast of the Isle of Lewis, many of which are in decline. However, the ornithological assessment fails to provide sufficient evidence demonstrating that these species will not be adversely affected. The evaluation does not adequately address the implications of displacement, collision risk, or habitat loss, which raises significant concerns.

There exists a fundamental contradiction within the application. The developer concludes that there are no significant adverse effects while concurrently advancing a Habitats Regulations derogation case, which is only necessary when significant harm is

anticipated. This inconsistency undermines the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the evidence presented.

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 feeding grounds is not thoroughly recognised, and the reliance on modelling approaches generates uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars. Methodologies employed are likely to underestimate mortality rates, especially in light of incomplete baseline data and insufficient understanding of behavioural responses.

The siting of turbines within a recognised migratory corridor presents an additional, considerable risk, creating a barrier in a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate 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 fulfil the evidential threshold necessary to conclude that there is 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 met. This invokes the precautionary principle and hinders a lawful conclusion in support of consent.

Moreover, the deficiencies highlighted constitute a failure to comply with National Planning Framework 4 concerning biodiversity protection and the preservation 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 rendered unreliable due to internal inconsistencies, methodological weaknesses, and a lack of sufficient evidence. These deficiencies obstruct a thorough evaluation of impacts and support the conclusion that the application does not meet the statutory requirements for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is severely lacking, failing to acknowledge the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply interwoven. Rather than recognising heritage as a living, dynamic element, the application simplifies it into isolated, static assets. This flawed perspective neglects the ongoing social, cultural, and spiritual significance of these elements within the community.

Particularly alarming is the inadequate treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are not merely historical markers; they are active locations for burial and spiritual practices. The assessment reduces them to static features, ignoring their continued use and the implications of

development on their surroundings. This mischaracterisation leads to an incomplete understanding of the cultural impacts and dismisses their integral role in community life.

Moreover, the assessment overlooks intangible cultural heritage, including the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These aspects are fundamental to the area's identity, yet they are entirely absent from the evaluation, representing a significant gap. Without addressing these factors, the true cultural impact of the development remains obscured.

There are also substantial concerns regarding community rights and engagement. The Gaelic-speaking population possesses a unique cultural identity, with recognised characteristics of Indigenous Peoples, yet the application does not include a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the credibility of the assessment and contravenes established principles that call for participation in decisions affecting cultural and environmental matters.

A major procedural shortcoming is the lack of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The absence of this assessment prevents the competent authority from fulfilling its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This deficiency alone obstructs a lawful determination.

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

Taken as a whole, the failure to assess living heritage, intangible cultural value, community rights, and statutory duties creates a significant evidential gap. The cultural impacts of the proposed development have not been adequately examined, and the application does not provide a sufficient foundation for understanding the true cultural cost of the project.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

Summaries suggest that local residents are experiencing notable levels of stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts,

derived from direct engagement with the community, are factual rather than speculative. However, the non-disclosure of the complete assessment restricts proper examination of the findings and hampers the determination of their relevance within the decision-making process.

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

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the impacts on seascape, landscape, and visual elements is insufficient. It does not properly consider the extent of change or the sensitivity of the environment. The West Lewis coastline features an open Atlantic horizon and an undeveloped character, which contributes to a strong sense of remoteness. The proposed large-scale turbines, positioned near the shoreline, would create an industrial presence that alters this character, leading to a permanent and irreversible transformation of the landscape.

The application fails to accurately depict the scale of visual change. The turbines' size and proximity mean they would dominate views from residential areas, historic sites, and popular coastal locations. This dominance would harm visual amenity and diminish the qualities of naturalness and remoteness. The assessment does not adequately communicate the level of impact or its significance within such a sensitive landscape.

Methodological issues arise from the choice and presentation of visual viewpoints. It appears that some viewpoints do not adequately represent the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This suggests a risk that the visual impact has been underestimated, compromising the assessment's reliability.

Another notable flaw is the lack of an evaluation of the connections between landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape linked to the Atlantic horizon through visual and spatial relationships. The assessment treats these sites as separate entities, failing to acknowledge their interdependence, which results in an incomplete analysis of the impacts on their setting and cultural importance.

The industrialisation of the seascape would sever these connections, changing how heritage assets are experienced and disrupting their relationship with the natural horizon. This presents a visual impact that encompasses broader cultural and spatial harm, which has not been sufficiently assessed in the application.

From a policy standpoint, the proposal contradicts the National Planning Framework 4, particularly regarding the protection of natural areas and historic assets. The extent of change does not align with the necessity to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertions of compliance with policy.

Moreover, the identified impacts cannot be effectively mitigated. Given the turbines' size, height, and proximity, their presence would be dominant and unavoidable. Thus, the resulting change is fundamental and permanent, rather than something that can be reduced to an acceptable level through mitigation measures.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal entails extensive seabed preparation and installation works in a high-energy Atlantic environment, yet it lacks comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. This deficiency is alarming, particularly given that the application depends on future mitigation and contingency

measures, which are to be formulated post-consent. Such an approach does not allow for a thorough assessment of their adequacy or effectiveness.

The environmental context is crucial; the West Lewis coastline is home to clean coastal waters and significant habitats that are sensitive to sediment disturbance and contamination. Although the application acknowledges risks like sediment mobilisation and the possibility of accidental chemical or oil spills, it fails to provide adequate details on how these issues will be prevented, controlled, or monitored effectively.

Additionally, there is uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty raises concerns about potential effects on marine species and habitats that have already been identified as vulnerable in the wider assessment.

The situation is further exacerbated by the lack of detailed emergency response procedures. By postponing contingency planning until after consent has been granted, the application obstructs the evaluation of whether suitable safeguards are in place to manage pollution events. This introduces procedural risks and undermines the competent authority's capacity to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements established by the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation strategies be assessed prior to consent, as the absence of such information renders a lawful determination unfeasible. The application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the combination of undefined mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts significantly undermines the assessment. These deficiencies hinder a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application 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 assessment of the onshore infrastructure is not complete and does not adequately consider the impacts of this integrated project. The offshore turbines and the onshore works are interconnected, yet they are evaluated separately, leading to a disjointed approach that hides the true scale of environmental and socio-economic effects.

Onshore elements include cabling through protected moorland, a substation near Stornoway, and access infrastructure through sensitive landscapes. These constructions involve excavating deep peat areas, particularly in Barvas Moor, which is crucial for carbon storage and is an ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, hindering a full understanding of the project's overall environmental footprint.

By omitting or delaying the assessment of onshore impacts, the application obstructs the proper evaluation of cumulative effects. The Environmental Impact Assessment process requires all components of a project to be evaluated together, but the division between offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities are not fully appreciated.

There are notable risks to sensitive habitats, including machair systems and peatland areas that have policy protection. The application does not prove that the impacts on these habitats have been properly assessed or that suitable avoidance measures have been implemented. This creates a significant gap in evidence regarding biodiversity protection.

The proposal also raises issues related to carbon balance. Disturbing peatland releases stored carbon, which could lead to a carbon debt, contradicting renewable energy goals. The application does not sufficiently address this concern or show that the overall carbon balance is beneficial.

Furthermore, routing infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application fails to provide evidence that necessary consents or processes have been started, which raises doubts about its deliverability and lawful execution.

From a policy standpoint, the failure to assess the project as a unified 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 weakens the application further.

Overall, the separation of project components, the lack of comprehensive assessment, and insufficient evidence regarding environmental and land use impacts make this portion of the application incomplete and unreliable, preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment concerning dark skies and nocturnal wildlife represents a significant gap within the Environmental Impact Assessment. The exceptional darkness of the West Lewis coastline is a crucial aspect of its environmental quality, cultural identity, and tourism potential. The proposed installation of permanent red aviation lighting, which would be visible over extensive distances, threatens to create an intrusive “wall of light” across the western horizon, fundamentally changing the night-time landscape.

Additionally, the application lacks any evaluation of how this lighting may impact visual amenity, landscape character, or the experiences of both residents and visitors. Given the essential role that dark skies play in the region’s identity and in emerging tourism sectors such as astro-tourism, this failure to address lighting impacts is particularly concerning. The resulting absence in the overall landscape and environmental assessment is marked.

Moreover, the proposal neglects to evaluate its effects on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly vulnerable to artificial lighting due to phototaxis, leading to potential disorientation and heightened risks of collision. The absence of a lighting impact assessment or a phototaxis study means the proposal does not properly consider how aviation lighting could adversely affect these species or contribute to increased mortality rates.

This lack of evaluation is exacerbated by reliance on daytime survey data within the ornithological assessment, which fails to account for nocturnal behaviours and the associated risks. Other species, such as Kittiwakes, which may forage or migrate during night hours, are equally susceptible to the disorienting effects of artificial lighting. Without site-specific data collected during night-time hours, there exists a critical gap in understanding the ecological impacts of the proposal.

It is impossible to ascertain whether any protected species or designated sites would suffer adverse effects in the absence of a thorough assessment of nocturnal impacts. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt is not met, thereby invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission contravenes National Planning Framework 4, which emphasises the protection of natural environments and the maintenance of environmental quality. Furthermore, it diminishes the overall assessment of landscape and seascape impacts, as the character of night-time environments is vital to the broader ecological context.

In summary, the complete lack of evaluation regarding dark skies and nocturnal wildlife leads to a substantial evidential deficiency. The omission of baseline data, impact modelling, and species-specific analysis renders the application incomplete and incapable of substantiating a lawful decision.

TOURISM

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

Tourism has experienced substantial growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. Nonetheless, the application does not examine how the industrialisation of the seascape and the degradation of environmental quality might

affect Tourism Gross Value Added or broader economic resilience. Without such an analysis, it remains unclear if the development would offer a net economic benefit or harm an established and expanding sector.

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

Given the context of an island community with limited economic diversification, the disregard for assessing tourism impacts carries broader implications for employment, local businesses, and community sustainability. The omission of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been examined as mandated under the Islands (Scotland) Act 2018.

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

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

SUMMARY

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

There are serious shortcomings in the evidential basis for this proposal. It lacks complete and reliable baseline data, employs an undefined design envelope, relies on unspecified mitigation measures, and overlooks crucial impact pathways, such as those affecting nocturnal wildlife, the full extent of onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of likely significant effects or residual impacts.

The proposal also demonstrates clear procedural shortcomings. The lack of a compliant Island Communities Impact Assessment is a violation of statutory duty as

outlined in the Islands (Scotland) Act 2018, and the omission of the full Social Impact Assessment is a significant gap. These failures impede the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for consideration.

In addition, the proposal stands in direct opposition to National Planning Framework 4. It does not adequately protect biodiversity, natural places, or cultural heritage, fails to demonstrate that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit due to insufficient tourism impact modelling. The cumulative effects of offshore and onshore components have not been thoroughly assessed, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

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

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

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

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

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: D926E00C

Member of the public 1347

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 objection arises from a review of the Environmental Impact Assessment Report and associated documentation, which highlight significant deficiencies across planning, environmental, cultural, and procedural dimensions. The wind farm is planned off the west side of the Isle of Lewis, a region characterised by its Atlantic-facing coastline, relatively unspoiled environment, and rich cultural heritage. The design, proximity, and overall scale of the proposal raise critical questions about its compliance with statutory obligations, national policy frameworks, and the core principles of sustainable development.

A fundamental issue with the application is the inadequate evidential basis for reaching a lawful determination. Important environmental data is absent, baseline information appears limited and inconsistent, and several key elements of the proposal remain vague. The flexible design framework employed complicates an accurate assessment of potential significant effects. Furthermore, the documentation relies on unspecified mitigation measures, which hinders the ability to evaluate their effectiveness. Consequently, it does not facilitate a comprehensive understanding of the environmental, cultural, or community impacts, leaving the claims of negligible or non-significant effects unsupported by solid evidence.

The proposal encounters notable policy conflicts. It 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 overall health and wellbeing. The application fails to prove that it meets national criteria aimed at protecting biodiversity, addressing climate concerns, and maintaining environmental integrity. These inconsistencies impact the statutory tests needed for consent and challenge the competent authority's ability to determine the proposal's acceptability in terms of policy.

Moreover, the unprecedented scale of the development in this area raises substantial concerns about its landscape capacity, visual impact, and environmental repercussions, especially with large turbines situated close to the shoreline. Collectively, the lack of adequate information, reliance on undefined mitigation strategies, evidential deficiencies, and clear policy non-compliance indicate that the application is insufficient and unable to support a lawful determination. In light of these factors, adherence to the precautionary principle is essential.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a comprehensive, transparent, or dependable account of the potential environmental repercussions of the proposal. The employment of a flexible Project Design Envelope, lacking definitive commitments to specific turbine dimensions, layouts, or configurations, introduces a substantial level of uncertainty. This approach obstructs a consistent application of a worst-case scenario, thereby jeopardising the integrity of the assessment. As a result, the impacts presented may not accurately represent the development that is ultimately constructed, which prevents both the public and the competent authority from grasping the true scale of environmental effects.

Significant reliance is placed on mitigation measures, monitoring strategies, and management plans that remain undefined. The request for consent is thus made on the premise that environmental damage will be addressed at a later stage, which hinders any meaningful evaluation of the effectiveness of such measures or a thorough assessment of residual impacts. This postponement of critical information to post-consent stages is procedurally unacceptable and contradicts the intent of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation strategies be clearly established prior to determination.

There are numerous evidential deficiencies, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This leads to uncertainty surrounding the scale and significance of impacts, particularly where findings of negligible or non-significant effects are made without robust supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts and introduces a level of scientific uncertainty that cannot be aligned with statutory requirements.

Consequently, the application does not fulfil the evidential threshold stipulated under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate adherence to National Planning Framework 4, specifically the requirements pertaining to biodiversity protection and environmental integrity, as it has not been shown that impacts have been comprehensively assessed or that adequate safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives presented in this application is inadequate and fails to meet the necessary statutory requirements of the Environmental Impact Assessment

regime. Rather than offering a well-structured comparison of realistic alternatives based on environmental effects, the application provides a narrative of project evolution. This lack of analysis does not demonstrate that less harmful options have been properly identified, assessed, and selected over more damaging solutions.

In particular, there is no clear or evidence-based comparison of various offshore locations, development scales, or design configurations. The application does not show that the developer has seriously considered placing turbines further offshore, where visual, ecological, and coastal impacts would likely be reduced. The sensitivity of the West Lewis coastline, along with the critical importance of proximity to shore in determining impact, underscores the necessity for this analysis. The absence of such consideration undermines any claim that the proposed siting is the least damaging option available.

Furthermore, these shortcomings extend to the assessment of cable routing and landfall, as there is insufficient evidence that alternative routes have been adequately explored to minimise impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The lack of a clear avoidance strategy and failure to conduct comparative analysis suggest that mitigation by design has not been employed, with a reliance instead on post-design mitigation measures.

As a consequence, the application does not demonstrate that environmental harm has been minimised through thoughtful site selection, layout, and infrastructure routing. This failure to adhere to the established mitigation hierarchy prevents the competent authority from determining whether more appropriate and less harmful alternatives exist. The absence of a robust alternatives assessment further casts doubt on the sustainability and policy compliance of the proposal.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species exhibits significant deficiencies, failing to deliver a complete or reliable understanding of the ecological receptors within the West Lewis coastal environment. This area is biologically active and highly sensitive, yet the baseline data remains incomplete. The methodologies employed do not adequately capture the presence, behaviour, and habitat utilisation of key species, undermining the evidential basis for evaluating impacts.

One notable oversight pertains to otters, classified as a European Protected Species. The application does not adequately recognise or assess their use of coastal areas for foraging and movement. The absence of an evaluation of their core foraging range and

behavioural patterns results in a failure to adequately consider the potential effects of construction disturbance, noise, and increased activity, thereby undermining conclusions regarding the absence of significant effects on this species.

Further weaknesses appear in the assessment of basking sharks, with a reliance on aerial surveys that introduce significant detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence, especially when juxtaposed with established land-based observations that indicate frequent use of these waters. Neglecting to incorporate or properly assess such data results in an incomplete baseline, consequently weakening the reliability of the presented conclusions.

These methodological shortcomings render the conclusions of negligible or non-significant effects reliant on assumptions rather than robust evidence. The lack of sufficient baseline data obstructs meaningful evaluation of cumulative and indirect impacts, which includes considerations for seasonal variation and broader ecosystem interactions. This uncertainty complicates understanding the true scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the obligations of the Environmental Impact Assessment regime and National Planning Framework 4, as it has failed to properly identify or assess protected species. The uncertainty that has been 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 unsupported conclusions renders the assessment unreliable. These shortcomings inhibit a thorough evaluation of impacts on marine ecology and protected species, leading to the conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment pertaining to the proposed development is fundamentally unreliable, featuring significant internal inconsistencies and gaps in evidence that severely undermine its conclusions. This development is situated in critical foraging areas and migratory pathways along the west coast of the Isle of Lewis, which is home to internationally important seabird populations, many of which are already in decline. However, the application does not adequately demonstrate that these species will remain unaffected, failing to meet the evidential standard required for such assertions.

Moreover, there exists a stark contradiction within the application, wherein the developer asserts that there will be no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only warranted if significant harm is anticipated. This inconsistency calls into question the trustworthiness of the assessment, highlighting that the conclusions drawn are not substantiated by the available evidence. The assessment fails to provide robust proof that seabird

populations linked to protected sites, such as the Lewis Peatlands and St Kilda, will not suffer negative impacts. The critical nature of these feeding grounds has not been thoroughly addressed, and the reliance on modelling approaches creates uncertainty, particularly for species that are facing severe declines, such as Kittiwakes and Fulmars. Furthermore, the methodologies employed are likely to underestimate potential mortality, especially in contexts where baseline data is lacking and the behavioural responses of species are inadequately understood.

The placement of turbines within a recognised migratory corridor poses an additional significant risk, effectively establishing a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term consequences of sustained mortality in this corridor or the potential effects on species with limited global populations.

From a regulatory standpoint, the application fails to satisfy the evidential threshold necessary to assert that there will be no adverse effects on the integrity of protected sites. The presence of conflicting conclusions, in conjunction with data deficiencies and limitations in modelling, means that the standard of beyond reasonable scientific doubt has not been met. This activates the precautionary principle and obstructs a lawful conclusion supporting consent.

Additionally, the deficiencies observed illustrate non-compliance with the National Planning Framework 4 regarding biodiversity protection and the preservation of natural assets. The inability to conclusively demonstrate that internationally significant seabird populations will not be adversely affected places the proposal in direct opposition to national policy.

In summary, the assessment is rendered unreliable due to internal contradictions, methodological shortcomings, and insufficient evidence. These failings hinder a thorough evaluation of impacts and collectively contribute to the conclusion that the application does not satisfy the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity within the application is fundamentally flawed, failing to recognise the West Lewis coastline as a dynamic cultural landscape in which the environment, language, traditions, and community are deeply interconnected. The approach taken reduces heritage to a collection of isolated and static assets, neglecting their ongoing social, cultural, and spiritual roles in the community.

Culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas exemplify a significant oversight. These sites serve as active burial and spiritual places, yet they are mischaracterised as static features, with the assessment disregarding their continued use, significance, and the potential impacts of development on their settings. This misunderstanding leads to an incomplete evaluation of cultural effects and overlooks their integral role in community life.

Moreover, there is a troubling absence of consideration for intangible cultural heritage, which includes the Gaelic language and local traditions, as well as the enduring relationship between the community and its coastal environment. These elements are pivotal to the area's identity but are entirely neglected in the assessment, indicating a substantial gap in understanding the cultural impact of the proposed development.

The application also demonstrates a lack of engagement with community rights, particularly regarding the Gaelic-speaking population, which possesses distinct cultural identity characteristics recognised as those of an Indigenous People. The absence of a process for Free, Prior and Informed Consent raises concerns about the legitimacy of the assessment and fails to adhere to established principles of participation in matters affecting cultural and environmental interests.

A further procedural shortcoming is the failure to provide a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligations to evaluate the social, cultural, and economic impacts on the island community, rendering any determination unlawful.

From a policy standpoint, these inadequacies position the proposal in direct contradiction to the National Planning Framework 4, especially concerning the preservation of historic assets and places. The neglect of both tangible and intangible heritage and the failure to acknowledge living cultural practices signify a clear violation of policy requirements.

In conclusion, the collective failures to assess living heritage, intangible cultural values, community rights, and statutory obligations create a substantial evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application does not furnish a sufficient basis to assess the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

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

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

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of visual, seascape, and landscape impacts is alarmingly inadequate and does not truly capture the extent of change or the sensitivity of the environment that would be affected. The West Lewis coastline is characterised by its expansive Atlantic horizon, its unspoilt nature, and its profound sense of remoteness. The proposed installation of large-scale turbines near the shoreline would impose a continuous industrial presence, fundamentally altering this character and leading to a permanent and irreversible change to the landscape.

Moreover, the application fails to portray the scale of this visual disruption accurately. The turbines would dominate views from residential areas, historic sites, and popular coastal spots, directly impacting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment neglects to adequately express the significance of this impact within such a vulnerable landscape.

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

viewpoints. Evidence indicates that these viewpoints may not capture the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and valuable landscapes. This oversight risks understating the visual impact's magnitude and calls into question the reliability of the assessment.

Another serious shortcoming is the failure to consider the interconnected nature of the landscape, seascape, and cultural heritage. Significant sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape linked by visual and spatial relationships to the Atlantic horizon. The assessment erroneously treats these as separate assets rather than acknowledging their interdependence, resulting in an incomplete understanding of the impacts on their setting and cultural relevance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are perceived and breaking their connection to the natural horizon. This impact transcends mere visual disruption, representing a significant cultural and spatial harm that the application does not adequately address.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, which relates to the protection of natural environments and historic sites. The scale of proposed change is fundamentally at odds with the necessity to preserve landscape character, visual amenity, and the contexts of culturally important locations. Furthermore, the absence of a thorough worst-case assessment raises serious doubts about compliance with policy requirements.

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

In summary, the assessment fails to represent the impact's scale, the environment's sensitivity, and the interconnectedness of landscape and heritage. These significant deficiencies preclude a reliable evaluation and reinforce the assertion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment surrounding construction and pollution risks remains insufficient, lacking the necessary detail to accurately gauge potential environmental effects. This proposal entails significant seabed preparation and installation activities within a high-energy Atlantic setting. However, it fails to present comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it depends on mitigation and contingency measures to be developed after consent, which inhibits any meaningful assessment of their effectiveness or adequacy.

Particularly alarming is the reliance on undefined future measures, given the sensitivity

of the receiving environment. The West Lewis coastline features clean coastal waters and vital habitats that are susceptible to contamination and sediment disturbance. While the application notes risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it does not provide adequate detail on preventative, controlling, or monitoring measures.

Moreover, there exists a level of uncertainty concerning the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and explicitly defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also applies to potential repercussions on marine species and habitats identified as sensitive within the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application obstructs the evaluation of whether suitable safeguards are established to manage pollution incidents. This introduces procedural risks and weakens the capacity of the competent authority to evaluate environmental protection measures prior to the decision-making process.

From a regulatory standpoint, the deferral of essential environmental safeguards stands in conflict with the requirements set by the Environmental Impact Assessment regime. Significant effects and corresponding mitigations must be appraised before consent is granted, and the absence of such information renders any lawful determination impossible. Furthermore, the application does not demonstrate compliance with policy stipulations concerning environmental protection and water quality.

When considering the absence of defined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts, it becomes clear that the assessment is materially deficient. These issues hinder a thorough evaluation of construction and pollution risks and collectively support the view that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents significant shortcomings in its assessment of fisheries and marine life, which fails to offer a thorough evaluation of both ecological and socio-economic impacts. It has been established that the waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the application does not adequately demonstrate how these crucial uses and habitats can be preserved or maintained without considerable disruption.

A notable concern lies in the assumption that fishing activities can be displaced without negative repercussions. The application lacks evidence to support the claim that alternative fishing grounds are both available and capable of withstanding additional pressure. This gap in information is critical, as such displacement could lead

to overfishing in other areas and may have broader economic implications for the local fishing fleet. The absence of a clear, evidence-based assessment means that the potential impacts on fisheries and local livelihoods remain poorly understood.

Moreover, the proposal poses significant risks to marine species, especially through the underwater noise generated during construction activities. The anticipated high-energy hammer piling, conducted over an extended duration, is expected to disturb marine life over large distances, particularly affecting species like dolphins. The predicted disruption to a substantial portion of the local bottlenose dolphin population raises grave concerns, yet the application seems to downplay the significance of these potential effects, lacking sufficient evidence to support such minimisation.

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

Additionally, the assessment neglects to consider the cumulative impacts that arise from various pressures, including habitat disturbance, noise, and the displacement of fishing activity. Without a comprehensive evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate alignment with the National Planning Framework 4 or the National Marine Plan. It does not establish that the development can coexist with existing marine users or avoid unacceptable consequences for marine biodiversity, thus undermining any conclusion that the proposal constitutes sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The evaluation of onshore infrastructure is fundamentally lacking and does not encompass the full range of impacts that stem from a singular integrated project. The offshore turbines and the onshore works are closely interconnected; however, they are being assessed in isolation, leading to a disjointed approach that masks the actual magnitude of environmental and socio-economic repercussions.

Among the onshore components are cabling across protected moorland, the construction of a substation near Stornoway, and the necessary access routes through fragile landscapes. These activities necessitate excavation in areas rich in deep peat,

particularly within Barvas Moor, which serves as a crucial carbon store and is an ecologically sensitive area. The application fails to deliver a thorough assessment of these ramifications, hindering a complete understanding of the project's total environmental footprint.

Furthermore, the exclusion or postponement of onshore impact assessments obstructs a proper appraisal of cumulative effects. The Environmental Impact Assessment process mandates that all facets of a project be evaluated collectively. However, the segmentation of offshore and onshore components results in a lack of understanding regarding the combined impacts on peatlands, habitats, and local communities.

There are considerable risks to sensitive habitats, such as machair systems and peatland environments, which enjoy policy protection. The application does not confirm that the impacts on these habitats have been fully evaluated or that suitable avoidance measures have been taken, thereby leaving a significant evidential gap in terms of biodiversity conservation.

Concerns also arise regarding the carbon balance, as the disturbance of peatland releases previously stored carbon, potentially resulting in a carbon debt that undermines the goals of renewable energy initiatives. The application does not sufficiently tackle this issue or establish that the overall carbon balance remains advantageous.

Additionally, the routing of infrastructure through active croft land poses potential conflicts with current land use and legal rights. The application lacks evidence indicating that the required consents or processes have been initiated, casting doubt on its deliverability and legal execution.

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

In summary, the disaggregation of project elements, the absence of a thorough assessment, and the insufficient evidence regarding environmental and land use impacts render this aspect of the application incomplete and unreliable, ultimately preventing a lawful determination.

TOURISM

The evaluation of tourism impacts within the application is inadequate and neglects to address the economic and social effects on a vital sector of the Isle of Lewis economy. Tourism relies heavily on the region's wild coastline, nearly untouched landscape, dark skies, and sense of remoteness. The application states that 86% of visitors come for the scenery, but it lacks a quantifiable assessment of how large-scale offshore infrastructure could influence visitor numbers, behaviours, or the overall economic

contribution of tourism.

Tourism has seen substantial growth, rising from £65 million in 2017 to over £81.5 million, and it supports more than 1,000 jobs, making up to 16% of the island's economy. However, the application does not consider how the industrialisation of the seascape and potential loss of environmental quality would affect Tourism Gross Value Added or the broader economic resilience of the area. Without this analysis, it is impossible to ascertain whether the development would provide a net economic benefit or harm a vital and expanding sector.

The evaluation also overlooks the significance of environmental quality in promoting tourism, particularly the value of unspoiled landscapes and dark skies for visitor experiences, as well as emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment adds to this shortcoming, creating a major gap in understanding the potential impacts on a recognised and burgeoning part of the local economy.

Given the context of an island community with limited economic diversity, the neglect of tourism impact assessments has broader repercussions for employment, local businesses, and community sustainability. Furthermore, the absence of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been properly evaluated as mandated by the Islands (Scotland) Act 2018.

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

Overall, the shortcomings in quantifying tourism impacts, assessing environmental factors that influence visitor behaviour, and acknowledging the island's economic reliance create a substantial evidential gap. This gap hinders a comprehensive evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal represents a profound failure to fulfil the requirements of sustainable development as defined by statutory duties, national policy, and evidential standards. The issues that led to the refusal of the Lewis Wind Power proposal in 2008 are echoed in this application, which has been presented under a stronger policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

A complete and reliable evidential basis for determination is lacking in the application. There are significant gaps in baseline data, alongside the ongoing use of an undefined design envelope. The reliance on unspecified mitigation measures and the exclusion of

crucial impact pathways, including nocturnal wildlife, onshore infrastructure, and tourism effects, render the Environmental Impact Assessment incomplete. This deficiency hinders a comprehensive understanding of the likely significant effects or residual impacts.

Moreover, procedural failures are evident. The lack of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018, while the failure to disclose a complete Social Impact Assessment is a material omission. These shortcomings impede the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

In direct conflict with National Planning Framework 4, the proposal does not adequately demonstrate the protection of biodiversity, natural places, and cultural heritage. It fails to provide assurance that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative impact of offshore and onshore elements has not been thoroughly assessed, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

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

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

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

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

Additional Comments

It is incredibly short sighted and thoughtless to position the windfarm this close to shore, as well as the environmental, visual and ecological impacts. The impact on those who live and work there as it is so close to shore, to those that visit this beautiful area.

I have family that live and work in the west coast of Lewis and have done for several generations. The disregard to them, their way of life and the threat of pollution to the land and sea due to construction and then the ongoing operation, has not been considered.
The area relies on tourism to bolster the fragile economic and social infrastructure. At a time of depopulation of these areas and cultural loss of ways of life, this development threatens all of this.
As a long time visitor to the area, not only to visit family, but to enjoy the landscape, nature and peaceful way of life, i am extremely concerned by the impact this windfarm will have.

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: BF257282

Member of the public 1348

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

Dear Sir/Madam

This letter represents a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted in accordance with the relevant marine licensing and Environmental Impact Assessment requirements. The objection arises from a comprehensive review of the Environmental Impact Assessment Report and its accompanying documents, revealing significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, nearly pristine environment, and rich cultural heritage. The dimensions, closeness to the coast, and design of the wind farm present serious questions about its alignment with statutory obligations, national policies, and the tenets of sustainable development.

A primary concern is the lack of adequate evidence supporting a lawful decision. Important environmental data is absent, baseline information is both limited and inconsistent, and critical components of the proposal are not clearly defined. The flexible design framework employed hinders a comprehensive understanding of the likely significant impacts, and the reliance on unspecified mitigation measures precludes a proper evaluation of their effectiveness. Consequently, the documentation fails to provide a complete or informed overview of potential environmental, cultural, or community consequences, making assertions of negligible or non-significant effects unsubstantiated by strong evidence.

Additionally, there are substantial conflicts with existing policies. The proposal appears to contravene the National Marine Plan, the Environmental Impact Assessment framework, and the National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health and wellbeing. It does not adequately demonstrate compliance with national obligations to preserve biodiversity, safeguard climate interests, or maintain environmental integrity. These discrepancies are critical as they directly impact the statutory tests necessary for granting consent and compromise the ability of the relevant authority to determine the development's acceptability from a policy standpoint.

The unprecedented scale of the proposed wind farm, with large turbines set in close proximity to the shoreline, raises significant concerns about landscape capacity, visual impact, and environmental consequences. Collectively, the lack of sufficient information, the dependence on undefined mitigation strategies, evidential shortcomings, and clear policy violations highlight that the application is incomplete and cannot support a lawful determination. In light of these factors, it is essential to apply the precautionary principle.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is lacking in material detail and fails to offer a full, transparent, or reliable overview of the likely environmental effects associated with the proposal. The flexible Project Design Envelope introduces uncertainty, as it does not commit to specific turbine dimensions, layouts, or configurations. This uncertainty undermines the assessment's integrity, resulting in potential discrepancies between the impacts presented and the actual development constructed. Consequently, both the public and the competent authority are left without a clear understanding of the environmental effects.

Moreover, the application depends heavily on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under the assumption that environmental harm will be managed later hinders any meaningful evaluation of effectiveness or assessment of residual impacts. This postponement of critical information to post-consent stages is not acceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be clearly established prior to any determination.

The report also exhibits serious evidential shortcomings, with gaps in baseline data, methodological limitations, and a reliance on assumptions instead of site-specific evidence. These issues generate uncertainty regarding the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are drawn without robust supporting data. A lack of sufficient information complicates a clear understanding of cumulative and worst-case impacts, leading to scientific uncertainty that does not align with statutory requirements.

As a result, the application does not meet the evidential standards set by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal does not comply with the National Planning Framework 4, which includes requirements for biodiversity protection and environmental integrity, as it cannot demonstrate that impacts have been fully assessed or that appropriate safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specified mitigation, and gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies prevent a lawful and thorough assessment of environmental effects and mean that the competent authority lacks the necessary information to make a determination on the application.

ASSESSMENT OF ALTERNATIVES

The proposal under consideration demonstrates a significant shortfall in the assessment of alternatives, failing to satisfy the statutory requirements set forth by the Environmental Impact Assessment regime. Instead of offering a well-structured and

reasoned comparison of viable alternatives based on their environmental impacts, the application merely outlines a narrative of the project's development. This approach does not adequately prove that less harmful options have been thoroughly identified, assessed, and preferred over more damaging alternatives.

There is a notable lack of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not show that the developer has properly considered the option of placing turbines further offshore, a move that could likely mitigate visual, ecological, and coastal impacts. The West Lewis coastline's sensitivity and the critical role of proximity to shore in determining impacts mean that the omission of this analysis prevents any justification for concluding that the proposed siting is the least damaging available option.

These shortcomings are also evident in the assessment of cable routing and landfall, where there is insufficient evidence of exploration into alternative routes that could avoid or minimise impacts on sensitive receptors. This includes consideration of areas with cultural and spiritual significance, such as Barvas Cemetery. The absence of a clear strategy for avoidance and the lack of comparative analysis suggest a failure to apply mitigation by design, relying instead on mitigation measures that occur post-design.

Consequently, the application does not demonstrate that environmental harm has been adequately minimised through site selection, layout, and infrastructure routing. This represents a disregard for the established mitigation hierarchy, hindering the competent authority's ability to determine whether there are less harmful and more suitable alternatives. In the absence of a thorough alternatives assessment, it is impossible to conclude that the proposal is sustainable or complies with relevant policy.

From a policy standpoint, this inadequacy jeopardises compliance with National Planning Framework 4, particularly concerning the protection of natural places, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment constitutes a significant omission that leads to the overarching conclusion that the application has not undergone proper assessment and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is fundamentally flawed, failing to provide a complete and reliable understanding of the ecological receptors in this sensitive and biologically active area. Inadequate baseline data and poor methodologies result in an inability to accurately capture species presence, behaviour, and habitat use, leading to a lack of evidential support for evaluating potential impacts.

Among the critical shortcomings is the omission of otters, which are a European

Protected Species. The application neglects to properly identify and assess their active use of coastal zones for foraging and movement. This oversight means that the assessment does not consider their core foraging range and behavioural patterns, resulting in an inadequate evaluation of the potential effects of construction disturbance, noise, and increased activity on this species. Consequently, the conclusions drawn regarding the absence of significant effects are undermined.

Moreover, the assessment of basking sharks suffers from serious deficiencies as it relies on aerial surveys that introduce substantial detection bias, particularly under Atlantic conditions. This methodology is likely to underestimate their presence when compared to established land-based observations that indicate frequent use of the waters. The failure to consider such data adequately leads to an incomplete baseline and further weakens the reliability of the presented conclusions.

These methodological shortcomings result in assertions of negligible or non-significant effects being based on unsubstantiated assumptions rather than solid evidence. The lack of sufficient baseline data also hinders meaningful assessment of cumulative and indirect impacts, including seasonal variation and broader ecosystem interactions, creating uncertainty about the actual risks 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 the National Planning Framework 4, as it has not properly identified or assessed protected species. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these circumstances, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development presents significant concerns regarding its impact on local wildlife, particularly on the internationally important seabird populations along the west coast of the Isle of Lewis. These populations, many of which are already in decline, are critical to the area's biodiversity. However, the application fails to adequately demonstrate that these species will not suffer adverse effects. The site is situated within vital foraging areas and migratory pathways, yet the assessment provided does not thoroughly evaluate the risks associated with displacement, collision, or habitat loss.

There exists a critical contradiction within the application itself, where the developer asserts that there will be no significant adverse effects while also putting forth a case for Habitats Regulations derogation, which is typically invoked in situations where significant harm is anticipated. This inconsistency raises doubts about the reliability of

the assessment and suggests that the conclusions drawn are not backed by sufficient evidence. Furthermore, the assessment lacks adequate proof that seabird species linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of their feeding grounds is insufficiently addressed, and reliance on modelling methodologies introduces uncertainty, particularly concerning species that are already in severe decline, like Kittiwakes and Fulmars.

The proposed siting of turbines within a recognised migratory corridor adds another layer of risk, potentially obstructing a primary flight path used by species migrating between the United Kingdom and Iceland. The assessment does not effectively evaluate the long-term consequences of ongoing mortality in this corridor or the potential impact on species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold needed to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, alongside data deficiencies and the limitations of modelling, indicates that the standard of beyond reasonable scientific doubt has not been fulfilled. This invokes the precautionary principle and inhibits a lawful conclusion in favour of consent.

The deficiencies noted also signify non-compliance with the National Planning Framework 4, particularly concerning biodiversity protection and the safeguarding of natural assets. The failure to prove that the development will not adversely impact internationally important seabird populations places the proposal in direct opposition to national policy.

In summary, the assessment is deemed unreliable due to internal inconsistencies, methodological flaws, and a lack of sufficient evidence. These issues hinder a thorough evaluation of potential impacts, reinforcing the conclusion that the application does not satisfy the statutory requirements necessary for approval.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment inadequately addresses cultural heritage and community identity, overlooking the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply interconnected. Rather than recognising heritage as an evolving entity with social, cultural, and spiritual significance, the application simplifies it into isolated, static assets.

Particularly concerning is the treatment of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas, which serve as active places for burial and spiritual practice. The assessment categorises these sites as static features, ignoring their continued relevance and the impact that development could have on their settings. This mischaracterisation leads to an incomplete understanding of cultural effects and neglects their importance to community life.

Furthermore, the assessment fails to account for intangible cultural heritage, such as

the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These elements are vital to the area's identity yet are completely overlooked, which represents a significant gap in the analysis. Without considering these aspects, the true cultural impact of the development remains unclear.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, with its unique cultural identity recognised as Indigenous, has not been afforded a process of Free, Prior and Informed Consent. This lack of genuine engagement calls into question the validity of the assessment and disregards well-established principles that emphasise participation in decisions impacting cultural and environmental matters.

Moreover, a critical procedural shortcoming is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The failure to conduct this assessment obstructs the competent authority from fulfilling its legal obligation to evaluate social, cultural, and economic impacts on the island community. This alone undermines the lawfulness of the determination.

From a policy perspective, these deficiencies directly conflict with National Planning Framework 4, especially regarding the protection of historic assets and places. The neglect of both tangible and intangible heritage and the disregard for living cultural practices clearly diverge from required policy standards.

Collectively, the oversight of living heritage, intangible cultural values, community rights, and statutory obligations results in a considerable evidential gap. The cultural impacts of the proposed development have not been thoroughly evaluated, and the application fails to offer a robust foundation for understanding the genuine cultural cost associated with it.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal currently under consideration has a materially deficient assessment of social impacts, health, and wellbeing, lacking the transparency required for a lawful evaluation. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents, yet the full report remains unpublished. This creates a significant evidential gap that impedes both public understanding and the competent authority's ability to grasp the full extent of social risks identified in the developer’s own research.

Available summaries reveal that local residents are experiencing measurable stress, anxiety, and concern due to the scale and proximity of the development. These impacts are based on direct engagement and are not speculative. However, the failure to disclose the complete assessment restricts proper scrutiny of these findings, thereby limiting the capacity to assess their significance in the decision-making process.

There is also notable evidence suggesting that the proposal is viewed as a direct threat

to community identity and cohesion, with “cultural loss” highlighted in the developer’s findings. Despite this, such impacts have not been adequately integrated into the main application nor given due consideration. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency undermines the Environmental Impact Assessment process, as a thorough understanding of social, economic, and health impacts is crucial for developments of this scale, especially where community character and functioning may be compromised. The application fails to provide a complete evidential basis for evaluating the balance between benefits and harms due to the absence of the full dataset.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments are required to support positive health outcomes and avoid harm, yet the evidence at hand points to existing adverse effects that have not been fully disclosed. Without access to the complete assessment, compliance with this policy cannot be verified.

The procedural implications are significant, as the competent authority is unable to conduct a rigorous socio-economic and health evaluation without the complete Social Impact Assessment. This constitutes a material omission within the application and a failure to meet the evidential requirements set forth by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, coupled with evidence of current adverse impacts, renders the assessment incomplete and unreliable. This prevents a lawful determination and reinforces the conclusion that the application lacks sufficient information for support.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development fails to provide an adequate assessment of seascape, landscape, and visual impacts, which undermines the true scale of change and sensitivity of the environment in question. The character of the West Lewis coastline is marked by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. The installation of large-scale turbines in close proximity to the shoreline would lead to a significant industrial presence that would fundamentally alter this character, resulting in a permanent and irreversible transformation of the landscape.

Furthermore, the application does not accurately convey the extent of visual change that would occur. The size and closeness of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, impacting visual amenity and diminishing the essential qualities of naturalness and remoteness. This serious level of impact has not been properly represented within the assessment, particularly given the sensitivity of the landscape.

There are also significant methodological issues concerning the choice and presentation of visual viewpoints. It appears that the selected viewpoints may not adequately capture the most sensitive receptors or worst-case scenarios, especially concerning important cultural heritage sites and high-value landscapes. This raises concerns that the true scale of visual impact may be understated, which in turn compromises the reliability of the assessment.

Moreover, the application neglects to consider the interconnectedness of landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are intrinsically linked to the surrounding landscape, with visual and spatial relationships to the Atlantic horizon. By treating these sites as isolated entities, the assessment fails to acknowledge their interdependence, leading to an incomplete understanding of the impact on their setting and cultural importance.

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 constitutes not only a visual concern but a wider cultural and spatial detriment 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, which emphasises the importance of safeguarding natural environments and historical assets. The scale of change proposed is incompatible 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 diminishes any assertions of policy conformity.

Ultimately, the identified impacts are not amenable to effective mitigation. Given the size, height, and proximity of the turbines, their presence would be overwhelming and unavoidable. The change would thus be fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation measures.

In summary, the assessment falls short in accurately portraying the scale of impact, the sensitivity of the environment, and the interconnected relationships between landscape and heritage. These shortcomings hinder a reliable evaluation and support the conclusion that the proposal does not align with the need to protect this significant landscape.

CONSTRUCTION AND POLLUTION RISKS

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

waters and important habitats vulnerable to sediment disturbance and contamination.

While the application does acknowledge risks such as sediment mobilisation and accidental chemical or oil spills, it does not adequately detail the strategies for preventing, controlling, or monitoring these risks. Moreover, there exists uncertainty regarding the scale and behaviour of sediment plumes that may arise from seabed disturbance and cable installation. The absence of robust modelling and clearly defined management strategies leaves unanswered questions about the extent, duration, and ecological impacts of these disturbances. This uncertainty also extends to potential effects on marine species and habitats, which have already been identified as sensitive within the broader assessment.

Furthermore, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application inhibits the assessment of whether suitable safeguards are established to address pollution events. This creates procedural risks and undermines the competent authority's ability to evaluate environmental protection measures at the time of determination.

From a regulatory standpoint, the postponement of critical environmental safeguards is in conflict with the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be assessed prior to granting consent, and the absence of this information prevents a lawful determination. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality. Collectively, these deficiencies obstruct a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is fundamentally incomplete.

FISHERIES AND MARINE LIFE

The assessment of the proposed development lacks a robust evaluation of ecological and socio-economic impacts, particularly concerning fisheries and marine life. The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry. However, the application does not adequately demonstrate that these habitats and uses can be preserved without substantial disruption.

A major concern is the erroneous assumption that fishing activity can be displaced without any consequences. The application fails to provide evidence that there are alternative fishing grounds that are available, accessible, or able to support the additional pressure that displacement would create. This oversight is critical, as such displacement could lead to overfishing in other areas and potentially have broader economic repercussions for the local fishing fleet. In the absence of a clear, evidence-based assessment, the potential impacts on fisheries and the livelihoods they support remain poorly understood.

Furthermore, the proposal poses significant risks to marine species, primarily due to the underwater noise generated during construction. The use of high-energy hammer piling over extended periods is likely to disturb marine life over considerable distances,

particularly affecting species such as dolphins. The anticipated disturbance to a notable portion of the local bottlenose dolphin population raises serious concerns, yet the application downplays these effects without providing adequate supporting evidence.

There exists a notable inconsistency within the application, where the necessity for licences to permit harm to European Protected Species is recognised, while the impacts are simultaneously portrayed as negligible. This contradiction calls into question the credibility of the assessment and raises serious concerns regarding adherence to the Habitats Regulations, especially in situations where harm may require legal authorisation.

Additionally, the assessment does not adequately consider the cumulative impacts stemming from various pressures, including habitat disturbance, noise, and the displacement of fishing activity. 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 National Planning Framework 4 or the National Marine Plan. It does not substantiate that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thereby impeding any conclusion regarding the proposal's sustainability.

In summary, the deficiencies surrounding the lack of evidence on 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.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal involves significant onshore infrastructure that is inadequately assessed and does not account for the comprehensive impacts of what constitutes a single integrated project. The separation of offshore turbines from onshore works leads to a disjointed evaluation, masking the true extent of environmental and socio-economic consequences.

Onshore activities encompass 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 necessitate excavation in areas of deep peat, particularly within Barvas Moor, a vital carbon store and ecologically delicate environment. The absence of a thorough assessment of these impacts hinders a full understanding of the project's overall environmental footprint.

The deferral of onshore impact assessments obstructs a proper appraisal of cumulative effects. The Environmental Impact Assessment process mandates a holistic consideration of all project elements; however, the disconnection between

offshore and onshore components means that the combined effects on peatlands, habitats, and local communities remain unclear.

Moreover, there are considerable risks to sensitive habitats, including machair systems and peatland ecosystems, which are afforded policy protection. The application fails to show that impacts on these habitats have been thoroughly evaluated or that effective avoidance measures have been put in place, highlighting a significant evidential gap in terms of biodiversity protection.

Concerns surrounding carbon balance also arise from the proposal. The disruption of peatland can release stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy initiatives. The application does not sufficiently address this issue or prove that the overall carbon balance remains advantageous.

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

From a policy standpoint, the failure to conduct a comprehensive assessment of the entire project and to demonstrate adequate protection of peatlands, habitats, and land use interests stands in conflict with the National Marine Plan and National Planning Framework 4. The inability to prove that impacts can be avoided or mitigated significantly weakens the application.

In summary, the fragmentation of project components, the incomplete assessment, and the lack of evidence concerning environmental and land use effects render this aspect of the application unreliable and incomplete, obstructing 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 tourism sector on the Isle of Lewis has seen substantial growth, rising from £65 million in 2017 to over £81.5 million, which now supports more than 1,000 jobs and accounts for up to 16% of the island's economy. However, the assessment of the application inadequately addresses the potential economic and social impacts on this critical sector. Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. While the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution of tourism.

Moreover, the assessment neglects to evaluate how the industrialisation of the seascape and a loss of environmental quality could affect the Tourism Gross Value Added and broader economic resilience. Without this analysis, it is impossible to ascertain whether the proposed development would generate a net economic benefit or hinder a sector that is already established and growing.

The role of environmental quality in supporting tourism is also overlooked, particularly concerning the significance of unspoiled landscapes and dark skies for visitor experiences, which are crucial for emerging markets like nature-based tourism and

astro-tourism. The omission of a Dark Skies Assessment further highlights this deficiency, creating a major gap in understanding the impacts on an increasingly recognised aspect of the local economy.

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

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

Taken collectively, the absence of a detailed quantification of tourism impacts, the lack of consideration for environmental factors influencing visitor behaviour, and the oversight of the island's economic dependency lead to a significant evidential gap. This gap inhibits a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

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

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

Moreover, procedural failings are evident in the submission. The absence of a compliant Island Communities Impact Assessment breaches the statutory requirements of the Islands (Scotland) Act 2018. Additionally, the non-disclosure of the full Social Impact Assessment constitutes a material omission, which hinders the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal conflicts with National Planning Framework 4, as it does not adequately demonstrate the protection of biodiversity, natural spaces, and cultural heritage. It fails to show that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative impact of both offshore and onshore components has not been properly assessed, obscuring their effects on peatlands, carbon balance, habitats, and crofting land.

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

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

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

Additional Comments

I feel the turbines are too big & too close to shore

The island infrastructure isn't built to cope with influx of people required to build this project.

There are many environmental risks the project is going to cause, polluting the skies at day & night with lighting, polluting the waters around the turbines & releasing carbon from peatlands will all have negative effects.

I don't feel the community benefit on offer are anywhere near sufficient for the loss of the natural beauty of our islands being destroyed. Loss of income to local business from tourism will also be affected.

Although local company's will benefit short term whilst the project is being built, long term all maintenance contracts will be sub contracted to mainland firms with little or no jobs for local people.

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: 91E6D2AE

Member of the public 1349

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. The objection is informed by a review of the Environmental Impact Assessment Report and related documentation, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural integrity. The site of the proposed development is located off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity.

The application lacks a solid evidential foundation for a lawful determination. Important environmental data is absent, baseline information is inconsistent and limited, and crucial elements of the proposal remain undefined. The flexible design framework employed hinders a clear understanding of potential significant effects, while the reliance on unspecified mitigation measures prevents any assessment of their effectiveness. Consequently, the documents do not provide a comprehensive or informed view of the environmental, cultural, or community impacts, rendering the claims of negligible or non-significant effects unsupported by adequate evidence.

There are significant policy conflicts present in the proposal. It appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural habitats, cultural heritage, and public health. The application does not prove that it can meet national requirements to safeguard biodiversity, climate interests, and environmental integrity. These conflicts directly impact the statutory tests needed for consent and weaken the ability of the competent authority to determine that the development complies with policy standards.

The scale of the proposed project is unprecedented for this area, with large turbines planned to be positioned close to the shoreline. This raises serious concerns about landscape capacity, visual dominance, and environmental impacts. The combination of insufficient information, reliance on undefined mitigation, evidential shortcomings, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. In light of these factors, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant shortcomings, failing to offer a comprehensive, transparent, or dependable account of the potential environmental consequences of the proposal. The flexible Project Design Envelope,

which lacks concrete commitments regarding turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This lack of specificity undermines the integrity of the assessment process, resulting in a presentation of impacts that may not accurately represent the final development. Consequently, both the public and the competent authority are left without a clear understanding of the true environmental effects.

Moreover, the application is heavily reliant on mitigation measures, monitoring strategies, and management plans that remain undefined. By seeking consent on the premise that environmental harm will be mitigated at a later stage, the application precludes any meaningful evaluation of the proposed measures' effectiveness or a proper assessment of residual impacts. This deferral of essential information to post-consent stages contravenes the intent of the Environmental Impact Assessment regime, which necessitates that significant effects and their mitigations are clearly outlined prior to decision-making.

Evidential deficiencies abound, including inadequate baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. Such gaps lead to uncertainties concerning the magnitude and significance of impacts, especially where conclusions of negligible or non-significant effects are put forth without solid supporting data. This insufficiency of information obstructs a clear understanding of cumulative and worst-case impacts, fostering scientific uncertainty that cannot align with statutory obligations.

As a result, the application does not meet the evidential requirements under the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly with respect to protected species and sensitive habitats. Additionally, the proposal fails to demonstrate alignment with National Planning Framework 4, especially regarding biodiversity protection and environmental integrity, as it does not substantiate that impacts have been fully assessed or that appropriate safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specified mitigation strategies, and significant gaps in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies hinder a lawful and thorough evaluation of environmental effects, leaving the competent authority unable to make an informed decision based on the provided information.

ASSESSMENT OF ALTERNATIVES

The application lacks a proper assessment of alternatives, failing to meet the requirements of the Environmental Impact Assessment regime. Instead of a clear and structured comparison of viable alternatives based on environmental impacts, it offers a narrative detailing the project's evolution. This method does not show that less harmful options have been effectively identified, evaluated, and chosen over more damaging alternatives.

There is a notable absence of transparent, evidence-based comparisons concerning different offshore locations, development scales, or design configurations. Specifically, the application does not prove that the developer has genuinely considered placing turbines further offshore, where potential visual, ecological, and coastal effects would likely be lessened. Given the sensitivity of the West Lewis coastline and the significance of proximity to shore in evaluating impacts, the lack of such analysis prevents any assertion that the proposed location is the least harmful option.

The shortcomings also apply to the assessment of cable routing and landfall, where there is inadequate evidence of a thorough exploration of alternative routes to avoid or lessen impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The failure to present a clear strategy for avoidance and the absence of comparative analysis suggest that mitigation by design has not been prioritised, resulting in reliance on post-design mitigation methods.

Consequently, the application does not demonstrate that environmental harm has been reduced through thoughtful site selection, layout, and routing of infrastructure. This represents a failure to adhere to the established mitigation hierarchy, hindering the competent authority's ability to ascertain whether less harmful and more suitable alternatives are available. Without a comprehensive assessment of alternatives, it is impossible to conclude that the proposal is sustainable or compliant with relevant policies.

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

MARINE ECOLOGY AND PROTECTED SPECIES

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

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

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

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

Moreover, the application fails to consider intangible cultural heritage, which includes the Gaelic language, traditions, and the long-standing relationship between the community and the coastal environment. These elements are central to the identity of the area but are entirely absent from the assessment, representing a significant omission. Without addressing these factors, the cultural impact of the development

cannot be fully understood.

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal lacks a full disclosure of the Social Impact Assessment, which is crucial for understanding social impacts, health, and wellbeing. The developer has conducted focus groups with local residents but has not published the complete report. This creates a significant gap in evidence and inhibits both public understanding and the competent authority's ability to assess social risks identified in the developer’s research.

Residents have reported measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement, not speculation. However, without the full assessment, the findings cannot be properly scrutinised, limiting the ability to evaluate their significance in the decision-making process.

Moreover, the proposal is viewed as a direct threat to community identity and cohesion, with references to “cultural loss” found in the developer’s own results. Unfortunately, these impacts have not been adequately integrated into the application or given sufficient consideration. The absence of the complete Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. Understanding the social, economic, and health impacts is vital for developments of this magnitude, especially when community character and functioning may be at risk. The failure to provide the full dataset means the application does not present a comprehensive evidential basis for weighing benefits against harm.

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

The procedural implications of this situation are significant. The competent authority is unable to carry out a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This constitutes a material omission in the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, along with evidence of existing negative impacts, makes the assessment incomplete and unreliable. This inhibits a lawful determination and supports the conclusion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal involves the installation of large-scale turbines near the West Lewis coastline, which is characterised by its open Atlantic horizon and undeveloped nature. This change would create a continuous industrial presence that fundamentally transforms the area, leading to a permanent alteration of the landscape. The assessment of seascape, landscape, and visual impacts associated with this development is significantly lacking, failing to adequately reflect the magnitude of change and the sensitivity of the local environment.

The scale and proximity of the turbines would lead to their dominance in views from residential areas, historic sites, and popular coastal locations. This would adversely affect visual amenity and diminish the naturalness and sense of remoteness that define the region. Furthermore, the assessment does not adequately communicate the significance of these impacts in a landscape that is already sensitive.

Concerns also arise regarding the methodology used in selecting and presenting visual viewpoints. It appears that some viewpoints do not adequately represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the visual impact has been understated, which calls into question the reliability of the assessment.

Another critical shortcoming is the failure to evaluate 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, tied together through visual and spatial relationships with the Atlantic horizon. The assessment wrongly treats these assets as isolated, leading to an incomplete understanding of the potential impacts on their setting and cultural significance.

The anticipated industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are perceived and affecting their connection to the natural environment. This presents not merely a visual concern but also a broader cultural and spatial detriment that has not been sufficiently assessed in the application.

From a policy standpoint, the proposal contravenes National Planning Framework 4 by failing to protect natural places and historic assets. The scale of proposed changes does not align with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. Moreover, the lack of a comprehensive worst-case impact assessment further undermines any assertions of policy compliance.

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

In summary, the assessment does not accurately convey the scale of impact, the sensitivity of the environment, or the interconnected nature of landscape and heritage. These deficiencies hinder a reliable evaluation and underscore the conclusion that the proposal is at odds with the necessary protection of this significant landscape.

CONSTRUCTION AND POLLUTION RISKS

The application lacks adequate detail regarding construction and pollution risks, rendering the assessment materially deficient. It proposes substantial seabed preparation and installation works within a high-energy Atlantic environment, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on the preparation of mitigation and contingency measures post-consent, which obstructs a meaningful evaluation of their adequacy or effectiveness.

This reliance on undefined future measures is particularly concerning given the sensitivity of the receiving environment. The West Lewis coastline supports clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide sufficient detail on how these risks will be prevented, controlled, or monitored.

Uncertainties also exist regarding the scale and behaviour of sediment plumes resulting

from seabed disturbance and cable installation. The lack of robust modelling and clearly defined management strategies means that it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty extends to the potential effects on marine species and habitats identified as sensitive within the wider assessment.

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

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

Overall, the lack of defined mitigation measures, insufficient detailed management plans, and uncertainties regarding potential impacts hinder a robust evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application falls short in providing a thorough assessment of fisheries and marine life, leaving significant concerns regarding ecological and socio-economic impacts unaddressed. The waters off the West Lewis coast host a diverse marine ecosystem and an active fishing industry, yet the proposal fails to ensure that these vital uses and habitats can be safeguarded without considerable disruption.

One major concern is the assumption that fishing activities can be relocated without repercussions. The application lacks evidence to support the availability and accessibility of alternative fishing grounds that could withstand additional pressure. This oversight is critical, as displacement poses a risk of overfishing in other areas, which may result in broader economic implications for the local fishing fleet. Without an evidence-based evaluation, understanding the effects on fisheries and livelihoods is impossible.

The proposal also raises significant risks to marine species, particularly due to the underwater noise generated during construction. Prolonged high-energy hammer piling is anticipated to disturb marine life across extensive areas, impacting species such as dolphins. The expected disturbance to a notable proportion of the local bottlenose dolphin population is alarming, yet the application minimises the importance of these effects without adequate supporting evidence.

There is a notable inconsistency within the application; while it acknowledges the need for licences to permit harm to European Protected Species, it simultaneously describes the impacts as negligible. This contradiction questions the credibility of the assessment and suggests potential non-compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

Moreover, the assessment neglects to evaluate cumulative impacts arising from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. A thorough examination of these combined effects is necessary to determine the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not comply with National Planning Framework 4 or the National Marine Plan. It fails to demonstrate that the proposed development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, leading to the conclusion that it does not represent sustainable development.

In summary, the lack of evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal inconsistencies render the assessment incomplete and unreliable. These shortcomings inhibit a proper evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents a fragmented assessment of the project, treating offshore turbines and onshore infrastructure as separate entities, which obscures the overall environmental and socio-economic impacts. The onshore components, including cabling across protected moorland and the construction of a substation near Stornoway, involve significant excavation in areas of deep peat, particularly within Barvas Moor. This location serves as a vital carbon store and an ecologically sensitive habitat. The assessment fails to provide a comprehensive analysis of the impacts associated with these activities, thereby limiting understanding of the project's complete environmental footprint.

By not addressing onshore impacts adequately, the application undermines the evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be examined together; however, the distinct treatment of offshore and onshore elements results in an incomplete understanding of the combined effects on peatlands, local habitats, and surrounding communities.

Moreover, there are substantial risks to sensitive habitats such as machair systems and peatland environments, which enjoy policy protection. The application lacks evidence that these habitats' impacts have been thoroughly assessed or that suitable avoidance measures have been implemented, indicating a significant evidential gap regarding biodiversity protection.

Concerns also arise about the carbon balance linked to the proposal. Disturbance to peatland has the potential to release stored carbon, which could lead to a carbon debt that contradicts the goals of renewable energy initiatives. The application does not sufficiently address this aspect or prove that the overall carbon balance is advantageous.

Additionally, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application does not demonstrate 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 an integrated whole and to ensure the protection of peatlands, habitats, and land use interests conflicts with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further diminishes the application's credibility.

In summary, the disjointed evaluation of project components, the absence of a thorough assessment, and the lack of substantial evidence on environmental and land use impacts render this application incomplete and unreliable, obstructing a lawful determination.

TOURISM

The assessment of tourism impacts within the application is severely lacking, failing to address the economic and social ramifications for a critical sector of the Isle of Lewis economy. Tourism relies heavily on the area’s unspoiled coastline, near-pristine landscapes, dark skies, and a sense of remoteness. Although the application acknowledges that 86% of visitors are attracted by the scenery, it does not provide a quantified assessment of how the proposed large-scale offshore infrastructure could influence visitor numbers, behaviour, or the overall economic contribution of the sector.

The significance of tourism is evident in its substantial growth, with revenue increasing from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island’s economy. Despite this positive trend, the application does not analyse how the potential industrialisation of the seascape and the resultant loss of environmental quality might affect Tourism Gross Value Added or broader economic resilience. Without such analysis, it is impossible to ascertain whether the proposed development would provide a net economic benefit or detract from a sector that is both established and expanding.

Furthermore, the assessment neglects to consider the crucial role of environmental quality in fostering tourism, particularly the significance of unspoiled landscapes and dark skies in enhancing visitor experience and emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this deficiency, creating a notable gap in understanding the impacts on a recognised and growing component of the local economy.

In an island community with limited economic diversification, the oversight in assessing tourism impacts carries broader implications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been evaluated in accordance with the Islands (Scotland) Act 2018.

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

Collectively, the shortcomings in quantifying tourism impacts, assessing the environmental factors that drive visitor behaviour, and considering the economic dependency of the island lead to a significant evidential gap. This undermines the ability to conduct a thorough evaluation of the economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm highlights serious deficiencies in meeting the standards of sustainable development, as required by statutory obligations, national policy, and evidential benchmarks. It echoes the critical issues that led to the rejection of the Lewis Wind Power proposal in 2008, when the extent of industrialisation was deemed unacceptable. This current application, while presented under a framework that places increased importance on biodiversity, peatland preservation, landscape integrity, and community welfare, fails to adequately address these priorities.

A reliable evidential foundation for the proposal is noticeably absent. There are significant gaps in baseline data, the design envelope remains undefined, and mitigation measures have not been clearly specified. Additionally, essential impact pathways—including those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism—are overlooked. Consequently, the Environmental Impact Assessment is inadequate, failing to provide a comprehensive understanding of potential significant effects or residual impacts.

Moreover, the process surrounding the application shows clear procedural shortcomings. The lack of a compliant Island Communities Impact Assessment is a breach of statutory duty under the Islands (Scotland) Act 2018, while the failure to present the complete Social Impact Assessment constitutes a critical omission. These issues hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for consideration.

In addition, the proposal contradicts National Planning Framework 4. It does not

adequately protect biodiversity, natural environments, or cultural heritage. Furthermore, it fails to demonstrate that health and wellbeing impacts are satisfactory and lacks evidence of net economic benefits, primarily due to insufficient tourism impact modelling. The cumulative effects of both offshore and onshore components have not been thoroughly assessed, leading to a lack of clarity regarding impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain unclear and potentially severe. Evaluations related to marine ecology, seabirds, protected species, and marine mammals are incomplete and occasionally inconsistent. The necessary evidential threshold to eliminate adverse effects beyond reasonable scientific doubt has not been satisfied, which engages the precautionary principle and precludes a lawful conclusion regarding acceptable impacts.

Furthermore, the proposal is set to bring about considerable and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, loss of dark skies, disruption of cultural and visual connections, and negative effects on tourism constitute enduring impacts that cannot be mitigated to an acceptable degree.

Overall, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, along with policy inconsistencies and unresolved environmental risks, inhibit a lawful and evidence-based decision. It is imperative that the competent authority either rejects the application on these grounds or utilises the appropriate regulatory measures to obtain the missing information.

As such, we formally request that the application for the Spiorad na Mara Offshore Wind Farm be rejected in its entirety.

Additional Comments

I feel the turbines are too big & too close to shore

The island infrastructure isn't built to cope with influx of people required to build this project.

There are many environmental risks the project is going to cause, polluting the skies at day & night with lighting, polluting the waters around the turbines & releasing carbon from peatlands will all have negative effects.

I don't feel the community benefit on offer are anywhere near sufficient for the loss of the natural beauty of our islands being destroyed. Loss of income to local business from tourism will also be affected.

Although local company's will benefit short term whilst the project is being built, long term all maintenance contracts will be sub contracted to mainland firms with little or no jobs for local people.

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: 601198C6

Member of the public 1350

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted in accordance with marine licensing and Environmental Impact Assessment requirements. The basis of this objection arises from a thorough review of the Environmental Impact Assessment Report and associated documents, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, a region celebrated for its Atlantic-facing coastline, nearly unspoiled environment, and rich cultural heritage. The size, location, and design of the wind farm present serious issues regarding their compliance with statutory obligations, national policies, and the overarching principles of sustainable development.

The application is fundamentally flawed due to its failure to present sufficient evidence for a lawful decision. Notably, essential environmental data is absent, baseline information provided is limited and inconsistent, and crucial elements of the proposal lack clear definition. The flexible design framework used raises doubts about the understanding of significant impacts, while the reliance on unspecified mitigation strategies hampers any assessment of their potential effectiveness. Consequently, the documentation does not facilitate a comprehensive understanding of the environmental, cultural, or community effects, and assertions of negligible or insignificant impacts lack credible substantiation.

Additionally, the application reveals substantial conflicts with established policy. It appears to contradict the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, especially concerning biodiversity, natural environments, cultural heritage, and public health. There is no evidence to demonstrate that national obligations regarding the protection of biodiversity, climate considerations, and environmental integrity can be fulfilled. These inconsistencies directly affect the statutory tests necessary for consent, thereby compromising the capability of the competent authority to deem the development acceptable from a policy standpoint.

The unprecedented scale of the proposed development raises further concerns, with large turbines positioned unnervingly close to the shore, leading to significant worries about landscape capacity, visual impact, and environmental consequences. In light of the lack of adequate information, reliance on undefined mitigation measures, evidential shortcomings, and clear policy non-compliance, it is evident that the application is incomplete and does not support a lawful decision. Under these circumstances, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed, lacking a full, transparent, and reliable evaluation of the likely environmental effects of the proposal. A flexible Project Design Envelope is employed, which does not commit to specific turbine dimensions, layouts, or configurations. This introduces significant uncertainty and hampers the ability to apply a worst-case scenario consistently. Such an approach undermines the integrity of the assessment, meaning that the impacts presented may not truly reflect the development that will ultimately be constructed. Consequently, both the public and the competent authority are left without a clear understanding of the actual extent of the environmental effects.

Furthermore, the application relies extensively on mitigation measures, monitoring strategies, and management plans that are yet to be clearly defined. Consent is sought on the premise that any environmental harm will be mitigated at a later stage. This deferral prevents any meaningful evaluation of the effectiveness of those measures and hinders the assessment of residual impacts. It is procedurally unacceptable to postpone key information until post-consent stages, as this contradicts the purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be clearly established before determination.

In addition to the above issues, there are notable evidential deficiencies within the assessment, such as gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. These shortcomings lead to uncertainty regarding the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are drawn without robust supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, creating scientific uncertainty that cannot align with statutory requirements.

As a result, the application does not meet the evidential threshold necessary under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Moreover, the proposal does not demonstrate compliance with National Planning Framework 4, as it fails to adequately assess impacts or ensure that appropriate safeguards are in place for biodiversity protection and environmental integrity.

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

ASSESSMENT OF ALTERNATIVES

The application proposes a development that inadequately assesses alternatives, failing to meet the statutory requirements of 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 narrative does not demonstrate that less harmful options have been identified, assessed, and selected over more damaging solutions.

There is a lack of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not show that the developer has considered placing turbines further offshore, where visual, ecological, and coastal impacts could potentially be reduced. Given the sensitivity of the West Lewis coastline and the critical importance of proximity to shore in assessing impact, the absence of such analysis undermines any claim that the proposed siting represents the least damaging option.

The deficiencies are also evident in the assessment of cable routing and landfall, where there is insufficient evidence that alternative routes have been explored to avoid or minimise impacts on sensitive receptors, including areas of cultural and spiritual importance such as Barvas Cemetery. The failure to present a clear avoidance strategy and the lack of comparative analysis suggest that mitigation by design has not been implemented, with reliance instead 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 obstructs the competent authority from determining whether more appropriate and less harmful alternatives are available. Without a robust alternatives assessment, it cannot be concluded that the proposal aligns with sustainable or policy-compliant solutions.

From a policy standpoint, this inadequacy compromises compliance with National Planning Framework 4, especially concerning the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission that contributes to the overall conclusion that the application has not undergone adequate assessment and therefore cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment regarding marine ecology and protected species is fundamentally flawed, failing to deliver a comprehensive and trustworthy understanding of the ecological receptors in the West Lewis coastal environment. This area is a highly sensitive and biologically rich marine system, yet the baseline data provided is insufficient. The methodologies employed do not effectively capture vital details about species presence, behaviour, and habitat usage, leading to an unreliable evidential basis for assessing potential impacts.

One critical oversight involves otters, classified as a European Protected Species. The

application does not adequately recognise or evaluate their active use of coastal regions for foraging and movement. Without consideration of their core foraging range and behavioural habits, the potential consequences of construction disturbances, noise, and increased activity remain inadequately assessed. This significant gap undermines the conclusions drawn about the absence of substantial effects on this species.

Additionally, the assessment of basking sharks is marred by its reliance on aerial surveys, which introduce a notable detection bias, especially under Atlantic conditions. This method is likely to underestimate the presence of these sharks, particularly when compared to established land-based observations that indicate their frequent use of the waters. The neglect to incorporate or properly evaluate such information results in an incomplete baseline, thus diminishing the reliability of the conclusions reached.

The limitations inherent in these methodologies mean that the assertions of negligible or non-significant effects stem from assumptions rather than solid evidence. The lack of adequate baseline data obstructs meaningful evaluations of cumulative and indirect impacts, which include seasonal variations and broader ecosystem interactions. This uncertainty raises concerns about the actual level of risk posed to marine species and their habitats.

From a regulatory standpoint, the application does not satisfy the requirements set by the Environmental Impact Assessment regime and the National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainty introduced by these deficiencies hinders the ability to eliminate adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Given these circumstances, granting consent cannot be justified.

In summary, the combination of incomplete baseline data, flawed methodologies, and unfounded conclusions renders the assessment unreliable. These shortcomings hinder a thorough evaluation of impacts on marine ecology and protected species, ultimately supporting the conclusion that the application lacks a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application is fundamentally flawed, containing significant gaps in evidence and internal contradictions that undermine its findings. The development is situated within critical foraging areas and migratory routes, yet the application does not adequately evaluate the potential effects of habitat loss, collision risk, or displacement on seabird populations. The west coast of the Isle of Lewis is home to seabird populations of international importance, many of which are already in decline. However, the application does not convincingly demonstrate that these species will not be adversely impacted.

There exists a notable contradiction within the application, as the developer claims no significant adverse effects while also pursuing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises

doubts about the credibility of the assessment and suggests that the conclusions drawn lack solid support from the evidence provided. Furthermore, the assessment fails to substantiate that seabirds linked to protected areas, such as the Lewis Peatlands and St Kilda, will remain unaffected, with the importance of their feeding grounds inadequately addressed. The reliance on modelling methods adds uncertainty, particularly for species facing severe declines like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality rates, particularly due to incomplete baseline data and a lack of understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor introduces significant risk, creating a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently explore the long-term consequences of sustained mortality within this corridor or the impact on species with small global populations. From a regulatory standpoint, the application does not meet the evidential threshold necessary to affirm no adverse effect on the integrity of protected sites. The combination of contradictory conclusions, data gaps, and modelling weaknesses means the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and prevents a lawful conclusion in support of consent.

Moreover, the identified deficiencies signify a lack of compliance with National Planning Framework 4 regarding the protection of biodiversity and the safeguarding of natural assets. The failure to demonstrate that internationally significant seabird populations will remain unharmed places the proposal in direct opposition to national policy. Overall, the assessment is deemed unreliable due to its internal inconsistencies, methodological flaws, and insufficient evidence. These issues hinder a thorough evaluation of impacts and contribute to the conclusion that the application does not fulfill the statutory requirements needed for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of community identity and cultural heritage is fundamentally insufficient and fails to recognise the West Lewis coastline as a dynamic cultural landscape where language, tradition, environment, and community are intrinsically linked. The approach taken in the application is overly simplistic, viewing heritage merely as isolated, static assets instead of acknowledging their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming is evident in the treatment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active burial grounds and spaces for spiritual practice, yet the assessment mischaracterises them as static features. This oversight disregards their continued use and significance, as well as the impact of development on their settings. Consequently, the evaluation of cultural effects is incomplete and overlooks their importance in community life.

Furthermore, the application neglects intangible cultural heritage, including the Gaelic language, traditions, and the enduring connection between the community and the

coastal environment. These aspects are vital to the area's identity, yet they are entirely missing from the assessment, representing a considerable omission. The cultural impact of the development cannot be adequately grasped without considering these elements.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, which embodies a distinct cultural identity and recognised characteristics of Indigenous Peoples, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the credibility of the assessment and fails to uphold established principles of participation in decisions that affect cultural and environmental interests.

A critical procedural failure is the lack of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligations to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders a lawful determination impossible.

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

In summary, the neglect to assess living heritage, intangible cultural value, community rights, and statutory duties results in a significant evidential gap. The cultural impacts of the proposed development have not been thoroughly evaluated, and the application fails to present a robust foundation for understanding the true cultural cost associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The Social Impact Assessment commissioned by the developer has not been published in its entirety, leading to a significant evidential gap. This lack of transparency not only hampers the public's understanding but also restricts the competent authority's ability to grasp the full extent of social risks identified through the developer’s own research. Available summaries suggest that local residents are already experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement, not speculation, yet the failure to disclose the complete assessment limits proper scrutiny of the findings and affects their significance in the decision-making process.

Furthermore, the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. However, these adverse impacts have not been adequately incorporated into the main application or given the weight they deserve. By withholding the full Social Impact Assessment, the true human and social costs of the development remain obscured.

This situation undermines the Environmental Impact Assessment process, as a comprehensive understanding of social, economic, and health impacts is critical for developments of this nature, especially when community character and functionality may be at stake. The application falls short by not providing the full dataset needed for a thorough assessment of the balance between benefits and harm.

From a policy standpoint, there is a clear failure to comply with National Planning Framework 4 concerning health and wellbeing. Development projects must foster positive health outcomes and avoid causing harm. Nevertheless, the evidence available points to existing adverse effects that have not been fully disclosed, leaving compliance with this policy unproven.

The procedural implications are profound, as the competent authority cannot conduct a robust socio-economic and health evaluation without access to the complete Social Impact Assessment. This omission signifies a failure to meet the evidential requirements of the Environmental Impact Assessment regime. Collectively, the non-disclosure of the full Social Impact Assessment, alongside evidence of adverse effects already in place, renders the assessment incomplete and unreliable, which obstructs a lawful determination and affirms that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

Methodological concerns arise regarding the selection and presentation of visual viewpoints. Evidence indicates that some viewpoints may fail to represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the magnitude of visual impact has been underestimated, thus challenging the reliability of the assessment.

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

landscape setting linked to the Atlantic horizon through visual and spatial relationships. The treatment of these sites as isolated assets does not acknowledge their interdependence, resulting in an incomplete evaluation of the impacts on their setting and cultural significance.

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is severely lacking, failing to provide the necessary detail for evaluating environmental effects. This proposal entails considerable seabed preparation and installation activities in a challenging Atlantic environment, yet it lacks fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that are to be defined after consent, which obstructs any meaningful appraisal of their adequacy or effectiveness.

The reliance on vague future measures raises significant concerns, particularly given the sensitivity of the West Lewis coastline. This area is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges potential risks such as sediment mobilisation and accidental chemical or oil spills, it falls short in detailing how these threats will be prevented, controlled, or monitored.

There exists a notable uncertainty regarding the scale and dynamics of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly articulated management strategies, the impacts' extent,

duration, and ecological consequences cannot be established. This uncertainty also extends to the effects on marine species and habitats that have already been recognised as sensitive in the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning until after consent, the application hampers the evaluation of whether adequate safeguards are established to address potential pollution events. This creates procedural risk and diminishes the competent authority's ability to review environmental protection measures during the determination process.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the Environmental Impact Assessment regime's requirements. Significant effects and necessary mitigation must be evaluated prior to consent, and in the absence of such information, a lawful determination cannot be achieved. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts lead to a materially deficient assessment. These failures obstruct a thorough evaluation of construction and pollution risks and substantiate the assertion that the application remains incomplete.

FISHERIES AND MARINE LIFE

The assessment regarding the impacts on fisheries and marine life is inadequate and fails to present a thorough evaluation of both ecological and socio-economic consequences. The waters along the West Lewis coast are home to a diverse marine ecosystem and a vibrant fishing industry. However, the application does not adequately demonstrate how these activities and habitats can be preserved or maintained without significant disruption.

A notable concern is the presumption that fishing activities can simply be shifted without repercussions. The application does not provide any evidence that alternative fishing grounds exist, are accessible, or can handle increased pressure. This gap is crucial, as the risk of overfishing in other areas could arise, potentially leading to broader economic ramifications for the local fishing fleet. Without a clear, evidence-based assessment, understanding the effects on fisheries and livelihoods remains incomplete.

Furthermore, the proposal presents significant risks to marine species, especially due to the underwater noise produced during construction. The use of high-energy hammer piling for extended durations is expected to create disturbances over considerable distances, impacting species such as dolphins. The predicted disruption to a large segment of the local bottlenose dolphin population raises important issues, yet the application minimizes the seriousness of these effects without adequate supporting

evidence.

There is also a striking inconsistency within the application, as it acknowledges the necessity of licences for any harm to European Protected Species, while simultaneously describing those impacts as negligible. This contradiction undermines the trustworthiness of the assessment and raises issues related to adherence to the Habitats Regulations, particularly when harm is expected to a degree that necessitates legal permission.

Additionally, the assessment neglects to address cumulative impacts that arise from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. In the absence of 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 does not demonstrate alignment with National Planning Framework 4 or the National Marine Plan. It fails to establish that the development can exist alongside current marine users or avoid unacceptable consequences for marine biodiversity, which hinders the conclusion that the proposal embodies sustainable development.

When considered as a whole, the lack of evidence concerning fishing displacement, the underestimation of acoustic impacts, and the internal contradictions render the assessment both incomplete and unreliable. These shortcomings impede a thorough evaluation of the repercussions for marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal raises significant concerns about carbon balance. The disturbance of peatland can lead to the release of stored carbon, resulting in a carbon debt that is contrary to the goals of renewable energy development. The application fails to sufficiently address this matter or demonstrate that the overall carbon balance will remain positive.

Moreover, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is no evidence presented that indicates the necessary consents or processes have been initiated, which calls into question the deliverability and lawful execution of the project.

There are substantial risks to sensitive habitats, including machair systems and peatland environments, which are afforded policy protection. The application does not show that impacts on these habitats have been fully assessed or that suitable avoidance measures have been taken. This reveals a significant evidential gap in terms of biodiversity protection.

The assessment of onshore infrastructure is materially incomplete and does not account for the full range of impacts associated with what is fundamentally a single

integrated project. The onshore works and offshore turbines are intrinsically linked yet assessed separately, leading to a fragmented approach that conceals the true scale of environmental and socio-economic effects.

The onshore elements include cabling across protected moorland, the construction of a substation near Stornoway, and the associated access infrastructure that traverses sensitive landscapes. These works entail excavation in areas of deep peat, particularly within Barvas Moor, which is an important carbon store and ecologically sensitive habitat. The application fails to provide a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By excluding or deferring the assessment of onshore impacts, the application obstructs the proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project be assessed collectively; however, the disjointed treatment of offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities remain inadequately understood.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment is notably lacking in its evaluation of dark skies and nocturnal wildlife, which constitutes a significant oversight. The West Lewis coastline is known for its exceptionally dark skies, a crucial aspect of both environmental quality and cultural identity, as well as an important factor for tourism. The proposed installation of permanent red aviation lighting would create a continuous "wall of light" effect that could be seen from long distances, fundamentally changing the night-time landscape.

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

The application also fails to address the potential impacts on nocturnal wildlife, such as the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, all of which are highly susceptible to artificial lighting. This susceptibility can lead to disorientation

and an increased risk of collision. Without a lighting impact assessment or a study on phototaxis, the proposal does not adequately consider how aviation lighting could affect these species or lead to increased mortality rates.

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

Without a thorough assessment of nocturnal impacts, it remains unclear whether protected species or designated sites could be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, which invokes the precautionary principle and calls into question the legality of the proposal.

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

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

TOURISM

The assessment presented regarding tourism impacts is severely lacking and does not sufficiently evaluate the economic and social repercussions for a vital sector of the Isle of Lewis economy. It is important to note that tourism is primarily reliant on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. The application acknowledges that 86% of visitors are attracted by the scenery, yet it fails to provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism has experienced significant growth, increasing from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. However, the application does not consider how the industrialisation of the seascape and the subsequent loss of environmental quality could impact Tourism Gross Value Added or broader economic resilience. Without this critical analysis, it is impossible to ascertain whether the development would yield a net economic benefit or harm an established and growing sector.

Moreover, the assessment neglects to take into account the role of environmental

quality in bolstering tourism, particularly the significance of unspoiled landscapes and dark skies for visitor experience, alongside burgeoning markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this issue, resulting in a significant gap in understanding the impacts on a recognised and expanding aspect of the local economy.

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

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

In summary, the inability to quantify tourism impacts, evaluate the environmental factors influencing visitor behaviour, and recognise the island's economic dependency leads to a substantial evidential gap. This prevents a thorough evaluation of economic effects and contributes to the conclusion that the application is incomplete.

SUMMARY

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

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

Procedural shortcomings are also evident. The absence of a compliant Island Communities Impact Assessment breaches the statutory duties under the Islands (Scotland) Act 2018. Furthermore, the failure to disclose the comprehensive Social

Impact Assessment constitutes a material omission, hindering the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These issues alone are substantial enough to deem the application unsuitable for consideration.

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

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

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

In summary, the application suffers from extensive information deficiencies, policy conflicts, and unresolved environmental risks, rendering it procedurally and substantively unfit for determination. The competent authority must refuse consent based on these grounds or utilise the appropriate regulatory measures to demand the submission of the missing information. Therefore, a formal request is made for the complete refusal of the application for the Spiorad na Mara Offshore Wind Farm.

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: 887F04AD

Member of the public 1351

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the marine licensing and Environmental Impact Assessment regimes. A thorough review of the Environmental Impact Assessment Report and accompanying documentation reveals significant planning, environmental, cultural, and procedural deficiencies associated with the development. Located off the west side of the Isle of Lewis, the area is characterised by its Atlantic-facing coastline, near-pristine environment, and robust cultural identity. The proposal's scale, proximity to the shoreline, and design raise serious concerns about its compliance with statutory requirements, national policy, and the principles of sustainable development.

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

Moreover, the application shows clear conflicts with established policies. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The applicant has not sufficiently demonstrated compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These policy conflicts are directly relevant to the statutory tests required for consent and weaken the competent authority's ability to conclude that the development is acceptable in policy terms.

The unprecedented scale of the proposal, with large turbines situated close to the shoreline, raises substantial concerns about landscape capacity, visual dominance, and overall environmental impact. The combination of insufficient information, reliance on undefined mitigation measures, evidential weaknesses, and clear non-compliance with policy indicates that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle should be invoked.

ASSESSMENT OF ALTERNATIVES

The proposed application fails to adequately assess alternatives, resulting in a significant shortcoming in meeting the statutory requirements outlined in the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives based on environmental impacts, the application presents a narrative describing the evolution of the project. This approach does not adequately demonstrate that less harmful options have been properly identified, assessed, and chosen over more damaging solutions.

Moreover, there is a notable lack of transparency and evidence regarding the comparison of alternative offshore locations, development scales, or design configurations. In particular, the application does not indicate that the developer has genuinely considered positioning turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be lessened. The sensitivity of the West Lewis coastline, along with the critical importance of proximity to shore when evaluating impact, makes this absence of analysis particularly significant. Therefore, it cannot be concluded that the proposed siting represents the least damaging option.

These deficiencies also encompass the assessment of cable routing and landfall, where there is insufficient evidence to suggest that alternative routes have been adequately examined to prevent or minimise impacts on sensitive receptors. This includes locations of cultural and spiritual significance, such as Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis imply that mitigation by design has not been implemented, resulting in reliance on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through thoughtful site selection, layout, and infrastructure routing. This represents a failure to adhere to the established mitigation hierarchy and hinders the competent authority's ability to ascertain whether less harmful and more suitable alternatives exist. In the absence of a thorough alternatives assessment, it is not possible to determine that the proposal is sustainable or complies with relevant policies.

From a policy perspective, this deficiency undermines compliance with National Planning Framework 4, particularly concerning the protection of natural places, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment constitutes a material omission that ultimately leads to the conclusion that the application has not been adequately evaluated and cannot facilitate a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment regarding marine ecology and protected species demonstrates significant deficiencies, failing to offer a thorough or dependable understanding of the ecological receptors within the West Lewis coastal environment. This region is a highly sensitive and biologically active marine system, yet the baseline data provided is inadequate, and the methodologies employed do not effectively capture the presence,

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

A critical gap is evident in the evaluation of otters, a species protected under European law, as the application does not adequately recognise or assess their active utilisation of coastal areas for foraging and movement. The neglect of their core foraging range and behavioural patterns means that the potential impacts of construction disturbance, noise, and increased activity have not been sufficiently evaluated. This deficiency undermines any assertions regarding the absence of significant effects on this species.

Further inadequacies are present in the assessment of basking sharks, where the reliance on aerial surveys introduces considerable detection bias, particularly under Atlantic conditions. This approach likely underestimates the presence of these sharks, especially when compared to established land-based observations that indicate frequent utilisation of these waters. The failure to properly consider such data leads to an incomplete baseline, undermining the reliability of the conclusions drawn.

These methodological shortcomings imply that any conclusions of negligible or non-significant effects are rooted in assumptions rather than solid evidence. The lack of adequate baseline data also hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty regarding the actual scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application fails to 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 introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. In light of these circumstances, consent cannot be lawfully granted.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The current assessment of cultural heritage and community identity is deeply flawed and does not recognise the West Lewis coastline as a vibrant cultural landscape. Here, the environment, language, tradition, and community are inextricably linked. Instead of appreciating the dynamic social, cultural, and spiritual roles that heritage plays, the application reduces it to mere isolated and static assets.

A significant shortcoming is evident in the treatment of culturally significant sites, such

as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites of burial and spiritual practice, but the assessment inaccurately categorises them as static features, neglecting their ongoing use, significance, and the potential impact of development on their surroundings. This mischaracterisation leads to a failure in evaluating the cultural effects and overlooks their importance in community life.

Moreover, the assessment neglects intangible cultural heritage elements, including the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These components are vital to the area's identity yet are completely omitted from consideration, creating a substantial gap in understanding the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity associated with characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the validity of the assessment and fails to adhere to established principles of participation in decisions that affect cultural and environmental interests.

A crucial procedural oversight 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 meet its legal obligation to evaluate the social, cultural, and economic effects on the island community, making this omission a barrier to lawful determination.

From a policy standpoint, the identified deficiencies place the proposal at odds with National Planning Framework 4, particularly concerning the protection of historic assets and places. Ignoring both tangible and intangible heritage, along with failing to acknowledge living cultural practices, represents a clear deviation from policy requirements.

Ultimately, the lack of assessment regarding living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been adequately addressed, and the application does not furnish a solid foundation for assessing the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The non-disclosure of the full Social Impact Assessment is a critical issue that undermines the assessment of social impacts, health, and wellbeing associated with the proposed development. Although the developer has engaged local residents through focus groups, the absence of the complete report represents a significant evidential gap. This gap restricts both public understanding and the competent authority’s ability to fully grasp the social risks highlighted in the developer’s own research.

Evidence shows that residents are currently facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement and are thus factual, not speculative. The lack of transparency in sharing the full assessment hinders proper scrutiny of these findings and limits the assessment of their significance in the decision-making process.

Moreover, there is a perception among residents that the proposal threatens community identity and cohesion, with indications of “cultural loss” noted in the developer’s findings. Yet, these social impacts have not been adequately integrated into the application or given the necessary weight. Consequently, the withholding of the full assessment obscures the true human and social cost of the development.

This failure of transparency significantly undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is vital for developments of this magnitude, particularly when they may affect community character and functioning. Without the full dataset, the application lacks a comprehensive evidential basis for weighing the balance between potential benefits and harms.

From a policy standpoint, the application does not satisfy the requirements of National Planning Framework 4 regarding health and wellbeing. Developments must promote positive health outcomes and avoid harm; however, the available evidence reveals existing adverse effects that have not been fully disclosed. Consequently, it is impossible to demonstrate compliance with this policy in the absence of the full assessment.

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 entire Social Impact Assessment. This omission constitutes a material flaw within the application, failing to meet the evidential requirements of the Environmental Impact Assessment regime.

In summary, the combination of non-disclosure of the complete Social Impact Assessment and the documented existence of adverse impacts renders the assessment incomplete and unreliable. This situation obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual and landscape impacts is fundamentally flawed, failing to accurately depict the extent of change and the sensitivity of the environment. The character of the West Lewis coastline is marked by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. The proposed large-scale turbines situated near the shoreline would introduce a continuous industrial presence that would fundamentally alter this character and result in a permanent transformation of the landscape.

Furthermore, the application inadequately addresses the magnitude of the visual change. Given the scale and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations. This would adversely affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not adequately capture this level of impact or its significance within such a sensitive landscape.

Concerns arise regarding the selection and representation of visual viewpoints within the assessment. There is evidence that the viewpoints chosen may not sufficiently reflect the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the visual impact has been understated, compromising the reliability of the assessment.

Additionally, there is a failure to evaluate the interconnectedness of landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a wider landscape setting, linked visually and spatially to the Atlantic horizon. The assessment considers these sites in isolation, neglecting their interdependence, which leads to an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, changing the context in which heritage assets are perceived and severing their connection to the natural horizon. This issue transcends mere visual impact, representing a broader cultural and spatial detriment that has not been sufficiently assessed 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 scale of transformation proposed is incompatible with the mandate to protect landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the lack of a thorough worst-case assessment further weakens any assertion of compliance with policy.

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal includes significant seabed preparation and installation works in a high-energy Atlantic environment. However, it lacks fully developed Construction Environmental Management Plans or Pollution Prevention Plans. This deficiency prevents a proper evaluation of the likely environmental effects, relying instead on mitigation and contingency measures that will be prepared after consent. Such an approach does not allow for a meaningful assessment of their adequacy or effectiveness.

The West Lewis coastline, known for its clean coastal waters and important habitats, is particularly sensitive to sediment disturbance and contamination. Although the application acknowledges risks like sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on how these issues will be prevented, controlled, or monitored.

There is uncertainty about the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also applies to potential effects on sensitive marine species and habitats identified in the wider assessment.

The application further lacks detailed emergency response procedures, which exacerbates these concerns. By postponing contingency planning to a post-consent phase, it hinders the evaluation of whether appropriate safeguards are in place for responding to pollution events. This introduces procedural risks and diminishes the ability of the competent authority to assess environmental protection measures when making a determination.

From a regulatory standpoint, deferring critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be evaluated prior to consent, and without this information, a lawful determination cannot be made. The application also does not demonstrate compliance with policy requirements for environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry. However, the application does not provide a thorough evaluation of the ecological or socio-economic impacts, failing to demonstrate that these important habitats and activities can be protected without significant disruption.

A major concern is the assumption that fishing activity can be displaced without consequences. There is no evidence presented that alternative fishing grounds are

available or able to handle increased pressure. This lack of information is critical, as displacement could lead to overfishing in other areas and potentially have wider economic repercussions for the local fishing fleet. Without a clear, evidence-based assessment, the effects on fisheries and livelihoods remain unclear.

The proposal also poses considerable risks to marine species, particularly due to underwater noise from construction activities. The extended use of high-energy hammer piling is likely to disturb marine life over large distances, affecting species such as dolphins. The application downplays the predicted impact on a significant portion of the local bottlenose dolphin population, raising serious concerns without adequate supporting evidence.

Furthermore, there is an inconsistency in the application regarding the need for licences to harm European Protected Species, while simultaneously claiming that impacts are negligible. This contradiction undermines the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially where harm is expected to occur at a level that requires legal authorisation.

Additionally, the assessment neglects to consider cumulative impacts from various pressures, including habitat disturbance, noise, and displacement of fishing activities. Without a comprehensive evaluation of these combined effects, it is impossible to determine the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate alignment 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 prevent unacceptable impacts on marine biodiversity, hindering any conclusion that the proposal represents sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The current application lacks a comprehensive assessment of onshore infrastructure, which is essential for understanding the full impact of what constitutes a single integrated project. The offshore turbines and onshore works are interconnected; however, they have been evaluated separately. This fragmented assessment obscures the true scale of environmental and socio-economic effects, leaving critical issues unaddressed.

The onshore components include cabling through protected moorland and the construction of a substation near Stornoway, as well as the necessary access infrastructure across sensitive landscapes. This work entails excavation in deep peat areas, particularly within Barvas Moor, which is a vital carbon store and an ecologically

significant habitat. By not providing a thorough assessment of these impacts, the application fails to convey the project's overall environmental footprint accurately.

Moreover, the application neglects the cumulative effects associated with the project by excluding or postponing the evaluation of onshore impacts. The Environmental Impact Assessment process mandates that all project elements be reviewed collectively; however, the distinct treatment of offshore and onshore components results in a lack of understanding regarding the combined impacts on peatlands, habitats, and local communities.

Risks to sensitive habitats, such as machair systems and peatland environments, are also significant and should be noted, especially since these areas are subject to policy protection. The proposal does not adequately demonstrate that the impacts on these habitats have been fully evaluated or that suitable avoidance measures have been implemented. This oversight contributes to an evidential gap concerning biodiversity protection.

Concerns related to carbon balance are another critical aspect. The disturbance of peatland can release stored carbon, which may lead to a carbon debt that contradicts the aims of renewable energy initiatives. The application does not sufficiently address this matter or prove that the overall carbon balance remains positive.

Additionally, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application has not supplied evidence that the appropriate consents or processes have been initiated, casting doubt on the project's deliverability and lawful execution.

From a policy standpoint, the lack of a unified assessment of the project and the failure to demonstrate adequate protection for peatlands, habitats, and land use interests stands in conflict with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further 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 culminate in an incomplete and unreliable application, inhibiting a lawful determination.

TOURISM

The tourism sector of the Isle of Lewis has experienced substantial growth, with its economic contribution rising from £65 million in 2017 to over £81.5 million, thereby supporting more than 1,000 jobs and constituting up to 16% of the island’s economy. However, the current application lacks a thorough assessment of how proposed large-scale offshore infrastructure could impact visitor numbers, behaviours, and the overall economic contribution of tourism, despite acknowledging that 86% of visitors are attracted by the area’s scenic beauty. This absence of a quantified analysis raises significant concerns regarding whether the development may yield a net economic

benefit or potentially undermine a crucial and expanding sector.

Furthermore, the assessment inadequately addresses the vital relationship between environmental quality and tourism, neglecting to evaluate how the preservation of unspoiled landscapes and dark skies enhances the visitor experience. The lack of a Dark Skies Assessment exacerbates this oversight, highlighting a substantial gap in understanding the implications for emerging markets such as nature-based tourism and astro-tourism.

The implications of not assessing tourism impacts extend beyond the sector itself, affecting local employment, businesses, and the sustainability of the community, particularly within an island context that exhibits limited economic diversification. The omission of a compliant Island Communities Impact Assessment means that these economic vulnerabilities, as mandated under the Islands (Scotland) Act 2018, have not been properly evaluated. From a policy standpoint, the application fails to adhere to the principles outlined in the National Planning Framework 4, especially concerning the necessity of demonstrating a net benefit and aligning with strategic objectives that prioritise tourism as a growth sector. This inadequacy further hampers the competent authority's ability to thoroughly assess the economic consequences of the proposal.

In conclusion, the deficiencies in quantifying tourism impacts, evaluating the environmental factors that drive visitor behaviour, and recognising the island's economic dependency culminate in a significant evidential gap. This gap hinders a comprehensive evaluation of the economic effects and suggests that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates significant shortcomings in meeting the essential criteria for sustainable development, as established by statutory duties, national policy, and evidential standards. It mirrors the fundamental issues that resulted in the rejection of the Lewis Wind Power application in 2008, where the unacceptable scale of industrialisation was a central concern. This current application, however, is being assessed within a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

A critical analysis reveals that the application lacks a complete and reliable evidential foundation necessary for a thorough determination. Notable gaps exist in the baseline data, and there is continued reliance on an unspecified design envelope, alongside mitigation measures that have yet to be clearly defined. Furthermore, it neglects to address key impact pathways related to nocturnal wildlife, the full extent of onshore infrastructure, and potential tourism effects. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of the likely significant effects or any residual impacts.

Moreover, the process has encountered clear procedural failings. The lack of a

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

In terms of compliance with National Planning Framework 4, the proposal is fundamentally misaligned. It does not adequately demonstrate the protection of biodiversity, natural environments, and cultural heritage. Additionally, it fails to prove that health and wellbeing impacts are acceptable and does not provide evidence of a net economic benefit, primarily due to the lack of tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore components is insufficient, leaving the effects on peatlands, carbon balance, habitats, and crofting land obscured.

Environmental risks associated with the proposal remain uncertain and potentially significant. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and often inconsistent. The necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been achieved, which invokes the precautionary principle and prevents any lawful conclusion that the impacts can be deemed acceptable.

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

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

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

Additional Comments

I feel the turbines are too big & too close to shore

The island infrastructure isn't built to cope with influx of people required to build this project.

There are many environmental risks the project is going to cause, polluting the skies at day & night with lighting, polluting the waters around the turbines & releasing carbon

from peatlands will all have negative effects.

I don't feel the community benefit on offer are anywhere near sufficient for the loss of the natural beauty of our islands being destroyed. Loss of income to local business from tourism will also be affected.

Although local company's will benefit short term whilst the project is being built, long term all maintenance contracts will be sub contracted to mainland firms with little or no jobs for local people.

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: E179D40B

Member of the public 1352

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, an area renowned for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. However, the scale and design of the proposal are unprecedented for this location and raise significant concerns about its compatibility with statutory requirements, national policy, and the principles of sustainable development.

A review of the Environmental Impact Assessment Report and the associated documentation has revealed material planning, environmental, cultural, and procedural deficiencies. There is a notable absence of critical environmental data, with baseline information being both limited and inconsistent. Furthermore, key aspects of the proposal remain undefined, and the adoption of a flexible design framework hinders a clear understanding of the likely significant effects. The reliance on unspecified mitigation measures raises additional concerns, as their effectiveness cannot currently be assessed. Consequently, the documentation fails to provide a complete or informed understanding of environmental, cultural, or community impacts, and assertions of negligible or non-significant effects are not backed by robust evidence.

There exist clear and substantial conflicts with policy. The proposal appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately 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 challenge the competent authority's ability to determine the development's acceptability from a policy standpoint.

Given the proposal's significant scale and the positioning of large turbines in close proximity to the shoreline, concerns surrounding landscape capacity, visual dominance, and overall environmental impact are heightened. The combination of insufficient 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 circumstances, the precautionary principle must be invoked.

ASSESSMENT OF ALTERNATIVES

The application fails to provide an adequate assessment of alternatives, falling short of the statutory requirements set out by the Environmental Impact Assessment regime. Instead of a structured and reasoned comparison based on environmental effects, it presents a narrative of the project's evolution. This approach does not demonstrate that less harmful options have been properly identified, assessed, and preferred over more damaging solutions.

There is a notable absence of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. The lack of consideration for placing turbines further offshore, which could potentially reduce visual, ecological, and coastal impacts, is particularly concerning. Given the sensitivity of the West Lewis coastline and the critical role that proximity to shore plays in determining impact, the omission of such analysis undermines any assertion that the proposed siting is the least damaging option.

The inadequacies extend to the assessment of cable routing and landfall, where there is insufficient evidence that alternative routes have been explored adequately to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The absence of a clear avoidance strategy, coupled with a lack of comparative analysis, indicates that mitigation through design has not been considered, relying instead on post-design measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This represents a clear failure to adhere to the established mitigation hierarchy, thus hindering the competent authority's ability to ascertain whether less harmful and more appropriate alternatives exist. Without a thorough assessment of alternatives, it cannot be concluded that the proposal is sustainable or compliant with policy requirements.

From a policy standpoint, this deficiency contradicts the principles outlined in National Planning Framework 4, particularly those concerning the protection of natural places, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment constitutes a significant oversight, leading to the conclusion that the application has not been thoroughly evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The application presents significant deficiencies in the assessment of marine ecology and protected species, failing to provide a complete and reliable understanding of the ecological receptors in the West Lewis coastal environment. This area is known for its biological activity, yet the baseline data remains incomplete, and the methodologies used do not adequately capture the presence, behaviour, and habitat use of species. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

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

European Protected Species, which actively use coastal areas for foraging and movement. The application does not take into account their core foraging range or behavioural patterns, leading to an insufficient evaluation of the potential effects caused by construction disturbances, noise, and increased activity. This oversight compromises any conclusions drawn about the absence of significant effects on this species.

Similarly, the assessment of basking sharks is flawed due to the reliance on aerial surveys that introduce substantial detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence when compared with established land-based observations that indicate these waters are frequently used by the species. The failure to incorporate relevant data undermines the baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings lead to conclusions regarding negligible or non-significant effects being based on assumptions rather than robust evidence. The lack of sufficient baseline data inhibits a meaningful assessment of cumulative and indirect impacts, including variations across seasons and interactions within the wider ecosystem. This uncertainty raises concerns about the actual risk to marine species and habitats.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of community identity and cultural heritage is severely lacking, neglecting the West Lewis coastline as a dynamic cultural landscape where the environment, language, tradition, and community are deeply intertwined. The application approaches heritage in a simplistic manner, perceiving it as a collection of disconnected, unchanging assets rather than recognising their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming is evident in the treatment of culturally important sites, such as the cemeteries located at Dalmore, Bragar, and Barvas. These sites serve as active places for burial and spiritual practice; however, the assessment inaccurately categorises them as static features, overlooking their continued use, significance, and the potential impact of development on their surroundings. This misrepresentation

leads to a partial understanding of cultural effects, disregarding the essential role these sites play in community life.

Additionally, the evaluation fails to consider intangible cultural heritage elements, including the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These aspects are crucial to the identity of the area yet are completely excluded from the assessment, marking a substantial oversight. The absence of these considerations prevents a comprehensive understanding of the cultural impact of the proposed development.

Concerns regarding community rights and engagement are also prominent. The Gaelic-speaking population embodies a unique cultural identity with traits of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement diminishes the credibility of the assessment and does not adhere to established principles of participation concerning decisions that affect cultural and environmental interests.

Moreover, a critical procedural oversight is the lack of a compliant Island Communities Impact Assessment, which is a statutory requirement as outlined in the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders a lawful determination impossible.

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

Overall, the neglect to assess living heritage, intangible cultural value, community rights, and statutory obligations leads to a considerable evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application falls short of providing a solid foundation for assessing the true 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 West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and a significant sense of remoteness. The proposal to introduce large-scale turbines in close proximity to the shoreline would lead to a continuous and dominant industrial presence, fundamentally transforming this character in a permanent and irreversible manner. The assessment fails to adequately represent the magnitude of the visual change that would occur. Given the scale and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations, thereby directly impacting visual amenity and eroding the defining qualities of naturalness and remoteness. The failure to convey the true extent of this impact within the context of such a sensitive landscape raises significant concerns.

Moreover, methodological issues are evident in the selection and presentation of visual viewpoints. It appears that the viewpoints chosen may not adequately represent the

most sensitive receptors or worst-case scenarios, particularly with respect to key cultural heritage sites and high-value landscapes. This suggests a risk that the actual magnitude of visual impact has been understated, which undermines the reliability of the assessment process.

Additionally, there is a critical deficiency in the assessment's treatment of the interconnected relationship between landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting linked by visual and spatial relationships to the Atlantic horizon. The evaluation treats these assets in isolation, disregarding their interdependence and leading to an incomplete assessment of impacts on their setting and cultural significance.

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks associated with the proposal is fundamentally lacking in detail, which hinders a proper evaluation of the likely environmental effects. This project entails significant seabed preparation and installation activities within the turbulent conditions of the Atlantic environment. However, it does not present fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it depends on mitigation and contingency measures that will only be formulated after obtaining consent, thereby obstructing any meaningful assessment of their effectiveness or adequacy.

The reliance on unspecified future measures raises considerable concerns, particularly

in light of the delicate nature of the receiving environment. The coastline of West Lewis is home to clean coastal waters and crucial habitats that are at risk from sediment disturbances and potential contamination. Although the application acknowledges certain risks, including sediment mobilisation and the possibility of accidental chemical or oil spills, it fails to adequately detail how these risks will be mitigated, controlled, or monitored.

There is also significant uncertainty surrounding the magnitude and behaviour of sediment plumes resulting from the seabed disturbances and cable installations. Without comprehensive modelling and clearly articulated management strategies, it becomes impossible to assess the extent, duration, or ecological repercussions of these impacts. This uncertainty also encompasses the potential effects on marine species and habitats already identified as sensitive within the broader assessment framework.

The lack of comprehensive emergency response procedures exacerbates these issues. By postponing contingency planning until after consent is granted, the application limits the ability to evaluate whether sufficient safeguards are in place for responding to pollution incidents. This introduces a procedural risk, undermining the competent authority's capability to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. It is necessary to assess likely significant effects and associated mitigations prior to granting consent. The absence of this critical information means that a lawful determination cannot be achieved. Furthermore, the application does not demonstrate adherence to policy requirements regarding environmental protection and water quality.

In summary, the combination of undefined mitigation measures, a lack of detailed management plans, and uncertainty regarding potential impacts creates a materially deficient assessment. These shortcomings impede 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 inadequate, failing to provide a thorough assessment of ecological and socio-economic impacts. The fishing industry along the West Lewis coast is active and vital, and the marine ecosystem in these waters is diverse. However, the proposal does not adequately demonstrate that these essential habitats and activities can be preserved without significant disruption.

One major concern is the assumption that fishing activities can be displaced without adverse effects. The application lacks any evidence that alternative fishing grounds exist, are accessible, or have the capacity to support increased pressure. This critical

omission poses risks of overfishing in alternative locations and may lead to broader economic ramifications for the local fishing fleet. In the absence of a clear and evidence-based assessment, the implications for fisheries and associated livelihoods remain unclear.

The proposal also introduces considerable risks to marine species due to the anticipated underwater noise from construction activities. The prolonged use of high-energy hammer piling is likely to create disturbances over large distances, particularly affecting dolphins. The projected disruption to a significant segment of the local bottlenose dolphin population is alarming, yet the application minimizes these effects without sufficient supporting evidence.

There exists a notable contradiction within the application regarding the need for licenses to harm European Protected Species, while simultaneously characterising the impacts as negligible. This inconsistency undermines the credibility of the assessment and raises serious concerns about compliance with the Habitats Regulations, particularly when harm is anticipated at a level that necessitates legal authorisation.

Furthermore, the assessment neglects to consider cumulative impacts resulting from a combination of factors, including habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough evaluation of these interconnected effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application falls short of demonstrating adherence to the National Planning Framework 4 or the National Marine Plan. It does not prove that the proposed development can coexist with current marine users or avoid unacceptable harm to marine biodiversity, precluding any conclusion that the project embodies sustainable development.

In summary, the deficiencies surrounding the lack of evidence on fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies render the assessment flawed and unreliable. These gaps hinder a comprehensive evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is fundamentally inadequate and does not encompass the full range of impacts stemming from what is a singular, integrated project. The offshore turbines are fundamentally connected to the onshore works, yet they are evaluated separately, leading to a disjointed approach that obscures the true magnitude of the environmental and socio-economic repercussions.

Onshore components include cabling that crosses protected moorland, the construction of a substation in proximity to Stornoway, and the development of access infrastructure through sensitive landscapes. These activities necessitate excavation in areas characterised by deep peat, particularly within Barvas Moor, which is a crucial

carbon store and an ecologically fragile habitat. The application fails to deliver a thorough assessment of these impacts, hindering a complete understanding of the overall environmental footprint of the project.

By omitting or postponing the evaluation of onshore impacts, the application inhibits a proper analysis of cumulative effects. The Environmental Impact Assessment process mandates that all elements of a project are considered collectively, yet the separation of offshore and onshore aspects leads to an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

There are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application does not sufficiently demonstrate that the effects on these habitats have been thoroughly assessed or that suitable avoidance measures have been put in place. This creates a notable evidential gap in relation to biodiversity protection.

Additionally, the routing of infrastructure through active croft land raises potential conflicts with established land use and legal rights. The application does not provide proof that necessary consents or processes have been initiated, which brings into question the deliverability and lawful execution of the project.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The omission of an assessment of dark skies and nocturnal wildlife is a significant gap within the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are crucial for environmental quality, cultural identity, and tourism. The introduction of permanent red aviation lighting, which would be visible over long distances, is likely to create a persistent and disruptive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

Furthermore, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This is particularly concerning given the role that dark skies play in the area's identity and the growth of sectors like astro-tourism. The lack of consideration for these impacts creates a clear deficiency in the overall assessment of the landscape and environmental factors.

A more pressing concern is the absence of analysis regarding the effects of lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are especially vulnerable to artificial lighting due to their phototactic responses, which can lead to disorientation and an increased risk of collision. The application does not include any impact assessment for lighting or a study on phototaxis, thus neglecting the potential effects of aviation lighting on these species and their mortality rates.

Compounding this issue is the reliance on daytime survey data within the ornithological assessment, which does not adequately represent nocturnal activity or the associated risks. Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this potential danger has not been evaluated. The lack of site-specific night-time data creates a crucial gap in understanding the ecological impacts involved.

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

From a policy standpoint, these omissions conflict with National Planning Framework 4, particularly concerning the protection of natural places and environmental quality. They also undermine the overall evaluation of landscape and seascape impacts, as the character of night-time environments is integral to the ecosystem.

Collectively, the lack of assessment regarding dark skies and nocturnal wildlife presents a substantial evidential shortfall. The absence of baseline data, impact modelling, and species-specific analysis leaves the application incomplete and inadequate for supporting a lawful decision.

TOURISM

The economy of the Isle of Lewis significantly relies on tourism, which has grown from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. Despite this importance, the application does not model the potential impacts of offshore infrastructure on the tourism sector, particularly concerning visitor numbers, behaviour, or overall economic contributions. The assessment overlooks the industrialisation of the seascape and the potential loss of environmental quality, failing to evaluate how these factors could affect Tourism Gross Value Added and the overall resilience of the local economy.

Tourism is fundamentally reliant on the area's wild coastline, unspoiled landscapes, dark skies, and sense of remoteness. The application acknowledges that 86% of visitors are attracted by scenery but lacks a quantified analysis of how large-scale developments might influence this attraction. The omission of a Dark Skies Assessment further exacerbates the deficiencies in the evaluation, leaving significant uncertainties about impacts on emerging markets like nature-based tourism and astro-tourism.

The implications of failing to assess tourism impacts extend beyond the sector itself, affecting employment, local businesses, and community sustainability in a context where economic diversification is already limited. The absence of a compliant Island Communities Impact Assessment means that critical economic vulnerabilities related to tourism have not been properly examined, contrary to the requirements set out under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not meet the standards of the National Planning Framework 4 regarding economic impact and the necessity of demonstrating a net benefit. It conflicts with strategic objectives that position tourism as a key growth sector and lacks the evidence needed for competent authorities to fully understand the economic consequences of the proposal.

In summary, the failure to quantify tourism impacts, assess the environmental drivers influencing visitor behaviour, and recognise the island's economic dependency creates a substantial evidential gap. This deficiency hinders a thorough evaluation of the economic effects and underscores the incompleteness of the application.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm presents significant shortcomings that undermine sustainable development, failing to meet the necessary statutory duties and national policy requirements. The project mirrors the core issues of the 2008 Lewis Wind Power proposal, which was previously denied due to unacceptable levels of industrialisation. Despite being submitted under an updated policy framework that emphasises biodiversity, peatland conservation, landscape preservation, and community wellbeing, the proposal still falls short.

Critical gaps in the evidence base are evident, particularly concerning baseline data and the reliance on an undefined design envelope. The proposal includes unspecified mitigation measures and omits key impacts such as those on nocturnal wildlife, the full extent of onshore infrastructure, and potential effects on tourism. As a result, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of significant effects or residual impacts.

Moreover, procedural deficiencies abound. The lack of a compliant Island Communities Impact Assessment is a breach of the Islands (Scotland) Act 2018, and the non-disclosure of a full Social Impact Assessment constitutes a serious omission. These gaps hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal conflicts with National Planning Framework 4, lacking evidence of biodiversity protection, safeguarding natural areas and cultural heritage, and failing to demonstrate acceptable health and wellbeing impacts. It does not provide any proof of net economic benefit due to the absence of tourism impact modelling. Furthermore,

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 are not only uncertain but potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The application does not meet the evidential threshold required to exclude adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle and precluding a lawful conclusion regarding acceptable impacts.

The proposal is set to cause extensive and irreversible changes to a particularly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, and the disruption of cultural and visual relationships, along with the negative repercussions on tourism, represent permanent effects that cannot be sufficiently mitigated.

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

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

Additional Comments

I feel the turbines are too big & too close to shore

The island infrastructure isn't built to cope with influx of people required to build this project.

There are many environmental risks the project is going to cause, polluting the skies at day & night with lighting, polluting the waters around the turbines & releasing carbon from peatlands will all have negative effects.

I don't feel the community benefit on offer are anywhere near sufficient for the loss of the natural beauty of our islands being destroyed. Loss of income to local business from tourism will also be affected.

Although local company's will benefit short term whilst the project is being built, long term all maintenance contracts will be sub contracted to mainland firms with little or no jobs for local people.

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: 8345284D

Member of the public 1353

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. My concerns arise from a thorough review of the Environmental Impact Assessment Report and the accompanying documentation, which reveal serious deficiencies in planning, environmental considerations, cultural aspects, and procedural compliance. The proposed development is set to take place off the west side of the Isle of Lewis, a region celebrated for its Atlantic-facing coastline, nearly untouched environment, and rich cultural heritage. The scale and design of this proposal raise urgent questions about its adherence to statutory requirements, national policy, and the principles that underpin sustainable development.

The application lacks a sufficient evidential foundation necessary for a lawful determination. There is a notable absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Key elements of the proposal remain undefined, with a flexible design framework inhibiting a clear understanding of potential significant effects. Furthermore, the reliance on unspecified mitigation measures raises questions about their effectiveness, leaving the documentation inadequate for a comprehensive understanding of the environmental, cultural, or community impacts. Consequently, claims of negligible or non-significant effects lack robust supporting evidence.

Substantial policy conflicts are evident as well. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment requirements, or National Planning Framework 4. This inconsistency is particularly prominent concerning biodiversity, natural spaces, cultural heritage, and health and wellbeing. The application fails to prove that it meets national obligations for the protection of biodiversity, climate interests, and environmental integrity. These conflicts undermine the ability of the competent authority to assess the acceptability of the development within policy parameters.

The scale of this proposal is unprecedented for this area, with large turbines being positioned alarmingly close to the shoreline, thereby raising significant concerns about the landscape's capacity, visual impact, and overall environmental effects. When considered collectively, the lack of adequate information, dependence on undefined mitigation measures, evidential weaknesses, and clear non-compliance with policy all indicate that the application is incomplete and unfit for a lawful determination. Under these circumstances, it is imperative that the precautionary principle be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report exhibits significant shortcomings and fails to deliver a comprehensive, transparent, or dependable evaluation of the anticipated environmental impacts associated with the proposal. The incorporation of a flexible Project Design Envelope, lacking specific commitments to turbine dimensions, layouts, or configurations, creates considerable uncertainty. This uncertainty inhibits the application of a worst-case scenario, thereby compromising the integrity of the assessment. Consequently, the impacts outlined may not accurately represent the development that will ultimately be realised, hindering both public understanding and the competent authority's capacity to comprehend the true extent of environmental effects.

Additionally, the application places considerable reliance on mitigation measures, monitoring strategies, and management plans that have yet to be articulated. The request for consent is predicated on the assumption that environmental harm will be mitigated at a later date, which undermines the ability to thoroughly evaluate the effectiveness of such measures or assess any 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 significant effects and mitigation strategies be clearly defined prior to any determination.

Moreover, there are notable deficiencies in the evidential basis, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This leads to uncertainty concerning the magnitude and significance of impacts, particularly when conclusions of negligible or non-significant effects are reached without adequate supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory obligations.

As a result, the application does not satisfy the evidential requirements set forth by the Habitats Regulations, which necessitate the exclusion of adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially in regard to protected species and sensitive habitats. The proposal also falls short of demonstrating compliance with National Planning Framework 4, including stipulations related to biodiversity protection and environmental integrity, as it remains unclear whether impacts have been fully evaluated or if appropriate safeguards have been established.

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

ASSESSMENT OF ALTERNATIVES

The application does not satisfy the statutory requirements of the Environmental Impact Assessment regime, as the assessment of alternatives is materially inadequate. Instead of offering a structured and reasoned comparison of feasible alternatives based on their environmental effects, it provides a narrative account of project evolution. This method does not demonstrate that less harmful options have been identified, assessed, and chosen over more damaging solutions.

Specifically, there is a lack of transparent and evidence-based comparison regarding alternative offshore locations, development scales, or design configurations. Notably, the application fails to indicate that the developer has genuinely considered placing turbines further offshore, which would likely reduce visual, ecological, and coastal impacts. The sensitive nature of the West Lewis coastline, along with the critical significance of proximity to shore in assessing impact, renders the absence of such analysis a significant flaw, inhibiting any conclusion that the proposed siting is the least damaging option.

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

Consequently, the application does not illustrate that environmental harm has been minimised through careful site selection, layout, and routing of infrastructure. This failure to adhere to the established mitigation hierarchy prevents the competent authority from determining whether less harmful and more suitable alternatives exist. The absence of a robust assessment of alternatives raises doubts about whether the proposal aligns with sustainable or policy-compliant solutions.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The 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 West Lewis coastline is a vibrant cultural landscape where the environment, language, traditions, and community are intricately linked. However, the assessment of cultural heritage and community identity is fundamentally inadequate. It adopts a reductive approach, treating heritage merely as a collection of static assets, rather than recognising their ongoing social, cultural, and spiritual significance within the community.

Culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are mischaracterised as static features, despite being active places of burial and spiritual practice. This oversight neglects their continued use and meaning, as well as the potential impact of development on their settings. Consequently, the cultural effects have not been adequately evaluated, disregarding the essential role these sites play in

community life.

The assessment also overlooks intangible cultural heritage, including the Gaelic language and traditions that are essential to the area's identity. This omission represents a significant failure, as these elements are vital for understanding the full cultural impact of the proposed development.

Moreover, there are serious concerns regarding community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity, recognised as characteristics of an Indigenous People. Yet, no Free, Prior and Informed Consent process has been implemented. This lack of meaningful engagement undermines the validity of the assessment and fails to align with established principles of participation in decisions that affect cultural and environmental interests.

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

From a policy standpoint, these deficiencies contradict National Planning Framework 4, particularly regarding the protection of historic assets and places. The failure to account for both tangible and intangible heritage, along with the lack of recognition of living cultural practices, represents a clear departure from policy obligations.

In summary, the failure to adequately assess living heritage, intangible cultural value, community rights, and compliance with statutory requirements results in a significant evidential gap. The cultural impacts of the development remain improperly evaluated, leaving the application without a sufficient basis for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal lacks the necessary transparency for a lawful evaluation of social impacts, health, and wellbeing. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents, but the full report remains unpublished. This creates a significant evidential gap that inhibits both public understanding and the competent authority's ability to fully grasp the social risks identified through the developer's research.

Summaries of the assessment suggest that local residents are already facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement and are not mere speculation. However, the absence of the full assessment hinders proper scrutiny of these findings and restricts the ability to evaluate their significance in the decision-making process.

Additionally, the proposal is viewed as a direct threat to community identity and

cohesion, with “cultural loss” noted in the developer's own findings. Despite this, such impacts have not been adequately integrated into the main application or given the appropriate consideration. Withholding the complete Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency also compromises the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning are at stake. By failing to provide the full dataset, the application does not present a complete evidential basis needed to assess the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Developments are expected to support positive health outcomes and mitigate harm; however, the available evidence suggests existing adverse effects that remain undisclosed. Without the complete assessment, demonstrating compliance with this policy is unfeasible.

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

In summary, the failure to disclose the full Social Impact Assessment, alongside evidence of existing adverse impacts, results in an incomplete and unreliable assessment. This inadequacy prevents a lawful determination and reinforces the view that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline, characterised by its open Atlantic horizon and undeveloped nature, is a region defined by a profound sense of remoteness. The proposed large-scale turbines, positioned close to the shoreline, threaten to impose a continuous and dominant industrial presence that would irrevocably alter the existing landscape character. This transformation represents a permanent change that cannot be undone, fundamentally affecting the area’s visual amenity and eroding its naturalness.

The assessment of the visual impacts associated with this proposal is grossly inadequate, failing to capture the true magnitude of the changes expected. The scale and proximity of the turbines would mean they dominate views from residential areas, historic sites, and popular coastal locations. However, the evaluation does not convey the significance of this impact in a sensitive landscape context. Concerns are raised about the selection and presentation of visual viewpoints, which may not sufficiently represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites. This flaw risks understating the true extent of visual impact, thereby compromising the overall reliability of the assessment.

Moreover, there is a critical oversight in the evaluation of the interconnected relationships between landscape, seascape, and cultural heritage. Notably, significant sites like the Calanais Standing Stones are part of a broader landscape that relies on visual and spatial connections to the Atlantic horizon. The current assessment treats these heritage assets as isolated, disregarding their interdependence with the surrounding environment, leading to a limited evaluation of impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these vital relationships, changing how heritage assets are perceived and severing their connection to the natural horizon. This constitutes not only a visual impact but also a deeper cultural and spatial detriment that has not been properly assessed. From a policy standpoint, the proposal contravenes National Planning Framework 4 by failing to protect natural places and historic assets adequately. The scale of change envisaged conflicts with the essential requirements to safeguard landscape character and the setting of culturally significant sites, and the absence of a comprehensive worst-case assessment further undermines compliance with policy guidelines.

It is evident that the impacts cannot be effectively mitigated. The height and proximity of the turbines ensure their presence would be both dominant and unavoidable, marking a fundamental and permanent alteration to the landscape that cannot be sufficiently reduced through mitigation efforts. In summary, the assessment overlooks the critical scale of impact, the sensitivity of the environment, and the intricate interrelationships between landscape and heritage. These shortcomings hinder a reliable evaluation and underscore the proposal's incompatibility with the preservation of this vital landscape.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife represents a significant oversight within the Environmental Impact Assessment. The coastline of West Lewis is known for its exceptionally dark skies, which play a vital role in the area's environmental quality, cultural identity, and appeal to tourism. The introduction of permanent red aviation lighting, visible over long distances, threatens to create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time landscape.

Furthermore, the proposal does not evaluate how this lighting will impact visual amenity, landscape character, or the experiences of both residents and visitors. This is particularly important given that dark skies are integral to the area’s identity and to developing tourism sectors like astro-tourism. The lack of consideration for these impacts results in a discernible gap in the overall landscape and environmental evaluation.

There is also a critical failure to assess potential impacts on nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are

particularly sensitive to artificial lighting due to their phototactic responses, which can lead to disorientation and increased risk of collision. The application does not contain any lighting impact assessment or phototaxis study, failing to evaluate how the proposed aviation lighting may influence these species or contribute to increased mortality rates.

This issue is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which does not account for nocturnal activity or the associated risks. For example, Kittiwakes, which may forage or migrate at night, are at risk of disorientation from artificial lighting, yet this has not been assessed. The absence of site-specific night-time data leads to a crucial gap in understanding the ecological impacts.

Without the necessary assessment of nocturnal effects, it is impossible to ascertain whether protected species or designated sites would suffer adverse impacts. The evidential standard needed to exclude adverse effects beyond reasonable scientific doubt cannot be achieved, which engages the precautionary principle and prevents a lawful decision-making process.

From a policy standpoint, this omission contradicts the National Planning Framework 4 regarding the protection of natural places and environmental quality. It also diminishes the comprehensive evaluation of landscape and seascape impacts, as the character of the night-time environment is a fundamental component of the overall ecosystem.

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

TOURISM

The application significantly overlooks the assessment of tourism impacts, failing to evaluate the economic and social implications for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, nearly pristine landscape, dark skies, and sense of remoteness. While it is acknowledged that 86% of visitors are attracted by scenery, the application lacks a quantitative assessment of how large-scale offshore infrastructure would influence visitor numbers, behaviour, or overall economic contribution.

Tourism has experienced notable growth, with revenues increasing from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. Despite this, the application does not explore how the industrialisation of the seascape and degradation of environmental quality would affect Tourism Gross Value Added or broader economic resilience. Without such an analysis, it remains unclear whether the development would provide a net economic benefit or harm an established and expanding sector.

Furthermore, the assessment fails to address the significance of environmental quality in bolstering tourism, particularly the value of unspoiled landscapes and dark skies to visitor experiences and emerging markets, including nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a substantial gap in understanding the impacts on a recognised and growing segment of the local economy.

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

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, especially concerning economic impact and the need to show net benefit. It also contradicts strategic objectives identifying tourism as a priority growth sector and fails to provide adequate evidence for the competent authority to evaluate the economic consequences of the proposal.

Collectively, the lack of quantification of tourism impacts, disregard for environmental influences on visitor behaviour, and failure to recognise island economic dependency culminate in a significant 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 fails to meet the requirements of sustainable development according to statutory duties and national policy. The core issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, primarily concerning unacceptable industrialisation, have not been adequately addressed, despite the application being presented under a framework that places increased importance on biodiversity, peatland protection, and community wellbeing.

The evidential basis for determining this application is neither complete nor reliable. There are significant gaps in baseline data and a reliance on a design envelope that remains undefined. Mitigation measures are not specified, and critical impact pathways, such as those affecting nocturnal wildlife, onshore infrastructure, and tourism, have been omitted. As a result, the Environmental Impact Assessment is incomplete and does not allow for a thorough understanding of potential significant effects or residual impacts.

Procedural deficiencies are also evident. The lack of a compliant Island Communities Impact Assessment breaches the statutory duties outlined in the Islands (Scotland) Act 2018, and the failure to disclose the full Social Impact Assessment is a notable omission. These issues hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Furthermore, the proposal contradicts the National Planning Framework 4, failing to demonstrate biodiversity protection, acceptable health and wellbeing impacts, or net economic benefits, as there is no tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore elements has not been adequately conducted, leaving unclear effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. The assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and internally inconsistent. The required evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been met, which necessitates the application of the precautionary principle and prevents a lawful conclusion that impacts are acceptable.

The proposal would also induce substantial and irreversible changes to a sensitive landscape. The industrialisation of the Atlantic-facing coastline, along with the loss of dark skies, disruption to cultural and visual relationships, and negative impacts on tourism, presents permanent effects that cannot be mitigated to an acceptable level.

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

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

Additional Comments

I cannot see how this project is in our island community and country's best interest. How can it get this far with all the proven impact this could have on the environment and wildlife. I strongly object to this project.

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: 030F564A

Member of the public 1354

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under marine licensing and Environmental Impact Assessment processes. The objection is based on a thorough review of the Environmental Impact Assessment Report and associated documents, highlighting significant deficiencies in planning, environmental concerns, cultural considerations, and procedural matters. The proposed development is situated off the west side of the Isle of Lewis, characterised by its Atlantic coastline, largely untouched environment, and strong cultural heritage. The size, location, and design of the project raise serious questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential foundation for a valid decision. It is missing critical environmental data, and the baseline information is both limited and inconsistent. Furthermore, important components of the proposal remain unspecified. The use of a flexible design framework hinders a clear assessment of potential significant effects. Additionally, the reliance on unspecified mitigation measures makes it impossible to evaluate their effectiveness. Consequently, the documentation does not provide a comprehensive understanding of the environmental, cultural, or community impacts, and the claims of negligible or insignificant effects lack strong supporting evidence.

There are notable and serious policy contradictions. The proposal seems to conflict with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, especially concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national standards for protecting biodiversity, climate interests, and environmental integrity. These contradictions are critical to the statutory requirements for consent and weaken the competent authority's ability to determine that the development meets policy standards.

The scale of the proposal is unprecedented in this area, with large turbines positioned close to the shoreline, raising significant concerns about the capacity of the landscape, visual impact, and environmental effects. The combination of insufficient information, reliance on undefined mitigation strategies, evidential flaws, and clear policy non-compliance illustrates that the application is incomplete and unable to support a lawful decision. In light of these factors, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally inadequate, failing to deliver a comprehensive, transparent, or dependable account of the expected environmental consequences of the proposal. A flexible Project Design Envelope is employed without firm commitments to specific turbine dimensions, layouts, or configurations. This approach introduces substantial uncertainty and hinders the consistent application of a worst-case scenario. Such a lack of clarity compromises the assessment's integrity and obscures the true extent of the environmental impacts, preventing both the public and the competent authority from fully grasping the potential effects of the development.

Moreover, the application leans heavily on mitigation measures, monitoring strategies, and management plans that remain undefined. As a result, consent is sought based on the premise that environmental harm will be mitigated in the future, which obstructs a meaningful evaluation of the effectiveness of these measures and assessment of any residual impacts. This postponement of essential information to post-consent stages is procedurally improper and contradicts the intention of the Environmental Impact Assessment regime, which necessitates that likely significant effects and mitigation strategies are clearly defined prior to decision-making.

The report also suffers from critical evidential shortcomings, including deficiencies in baseline data, methodological limitations, and reliance on assumptions rather than site-specific evidence. Consequently, there is uncertainty surrounding the scale and significance of the impacts, especially where conclusions of negligible or non-significant effects are drawn without robust supporting data. This lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, creating scientific uncertainty that does not align with statutory obligations.

As a result, the application does not satisfy the evidential threshold required under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate adherence to the National Planning Framework 4, including stipulations related to biodiversity protection and environmental integrity, as it cannot be evidenced that impacts have been thoroughly assessed or that appropriate safeguards are established.

Collectively, the dependence on an undefined design envelope, the absence of specific mitigation measures, and the gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings impede a lawful and thorough evaluation of environmental effects, leaving the competent authority unable to make a well-informed determination based on the information available.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment regarding marine ecology and protected species is fundamentally flawed, lacking a complete understanding of the ecological receptors within the West Lewis coastal environment. This region is a biologically active and sensitive marine system, yet the baseline data presented is inadequate. The methodologies employed

fail to effectively capture the presence, behaviour, and habitat use of species, leading to an unreliable basis for evaluating impacts.

A significant oversight is the assessment of otters, which are a European Protected Species. The application does not adequately recognise or assess their active use of coastal areas for foraging and movement. This neglect of their core foraging range and behavioural patterns means that the potential impacts from construction disturbance, noise, and increased activity have not been thoroughly evaluated. Consequently, this undermines the conclusions regarding the lack of significant effects on this species.

Additional shortcomings are evident 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 in light of established land-based observations that indicate frequent use of these waters. The failure to incorporate or appropriately consider such data results in an incomplete baseline, thereby diminishing the reliability of the conclusions drawn.

The methodological shortcomings 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 the assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty around the actual risks to marine species and habitats.

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

In summary, the assessment is rendered unreliable due to incomplete baseline data, flawed methodologies, and unsupported conclusions. These issues hinder a robust evaluation of the impacts on marine ecology and protected species, ultimately leading to the conclusion that the application lacks a sufficient evidential foundation.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is acknowledged as a living cultural landscape, where the interplay of environment, language, tradition, and community is essential. However, the application fails to recognise this interconnectedness, instead treating cultural heritage as a collection of static assets devoid of their dynamic social, cultural, and spiritual roles within the community. This reductive approach leads to a significant oversight regarding culturally significant sites, particularly the active burial and spiritual sites at Dalmore, Bragar, and Barvas. The assessment inaccurately categorises these places as static features, neglecting their continued use and the implications of development on their surroundings, which skews the evaluation of cultural effects and disregards their vital role in community life.

Moreover, intangible cultural heritage, including the Gaelic language, local traditions, and the community's enduring relationship with the coastal environment, is not addressed in the assessment. These vital elements contribute significantly to the area's identity, yet their absence represents a considerable oversight. The failure to incorporate these aspects limits the understanding of the true cultural impact of the proposed development.

Community rights and engagement are also central to this issue. The Gaelic-speaking population, characterised as an Indigenous People, has not been consulted in a manner that reflects the principles of Free, Prior and Informed Consent. This lack of meaningful engagement not only undermines the validity of the assessment but also fails to adhere to established practices in matters affecting cultural and environmental interests.

A critical procedural shortcoming is the failure to conduct a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The absence of this assessment hinders the competent authority from meeting its legal obligations to evaluate the social, cultural, and economic impacts on the island community, thus impeding lawful determination of the proposal.

From a policy standpoint, these deficiencies contradict the National Planning Framework 4, especially regarding the protection of historic assets and spaces. The disregard for both tangible and intangible heritage, alongside the failure to acknowledge living cultural practices, signifies a clear deviation from required policy standards.

In summary, the lack of assessment of living heritage, intangible cultural values, community rights, and adherence to statutory requirements creates a substantial evidential gap. The cultural impacts of the proposed development remain inadequately addressed, and the application fails to establish a sufficient basis for understanding the genuine cultural cost associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the assessment of social impacts, health, and wellbeing raises significant concerns regarding the legality of the evaluation process. The developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the complete report has not been made available. This omission creates a substantial evidential gap, hindering both public understanding and the competent authority's ability to grasp the full extent of social risks identified in the developer's own research.

Summaries indicate that residents are currently facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposed development. These findings stem from direct engagement and are thus firmly grounded in evidence rather than speculation. Nevertheless, the lack of access to the full assessment impedes proper scrutiny of the findings and limits the determination of their

significance within the broader decision-making framework.

Moreover, there is evidence suggesting that the proposal is viewed as a direct threat to community identity and cohesion, with the developer's own findings highlighting concerns around “cultural loss.” Despite this, such impacts have not been adequately incorporated into the primary application nor afforded the appropriate weight in the evaluation. The failure to disclose the complete Social Impact Assessment conceals the true human and social costs associated with the proposed development.

This deficiency in transparency also undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly when community character and functioning are at stake. By not providing the complete dataset, the application lacks the necessary evidential foundation to properly assess the balance of benefits and harms.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments should promote positive health outcomes and mitigate harm; however, existing evidence suggests there are adverse effects that remain undisclosed. Without the full assessment, compliance with this policy cannot be adequately demonstrated.

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 within the application and signifies a failure to adhere to the evidential standards set forth by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, coupled with the documented existing adverse impacts, results in an incomplete and unreliable assessment. This situation obstructs a lawful determination and reinforces the conclusion that the application is not underpinned by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, its undeveloped nature, and a profound sense of remoteness. The proposed introduction of large-scale turbines close to the shoreline threatens to establish a continuous industrial presence that would irrevocably alter this landscape. The assessment provided does not adequately capture the significant visual changes that would arise, as the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This dominance would directly affect visual amenity and detract from the essential qualities of naturalness and remoteness, while the assessment falls short in conveying the magnitude and significance of this impact on such a sensitive environment.

There are notable methodological flaws in how visual viewpoints have been selected

and presented. Evidence points to the possibility that these viewpoints may not fully encompass the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises concerns that the visual impact has been understated, calling into question the reliability of the overall assessment.

Additionally, the evaluation fails to recognise the interconnectedness of landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these cultural assets in isolation, neglecting their interdependence and leading to an incomplete understanding of the impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would sever the existing relationships, fundamentally altering the context in which these heritage assets are perceived and disrupting their connection to the natural horizon. This signifies not merely a visual impact but a more extensive cultural and spatial harm that has not been sufficiently evaluated in the application.

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

It is evident that the impacts identified cannot be effectively mitigated. Given the turbines' scale, height, and proximity, their presence would be overwhelmingly dominant and unavoidable. Consequently, the changes anticipated are fundamental and permanent, incapable of being reduced to an acceptable level through mitigation measures.

In summary, the assessment fails to accurately portray the scale of impact, the sensitivity of the environment, and the intricate relationship between landscape and heritage. These shortcomings impede a reliable evaluation and strongly support the conclusion that the proposal is incompatible with the protection of this landscape.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal presents significant concerns regarding the incomplete assessment of onshore infrastructure and its associated impacts, which are crucial for understanding the entirety of this integrated project. The offshore turbines and the onshore works are inherently connected, yet the current evaluation treats them as separate entities. This fragmented assessment obscures the true extent of environmental and socio-economic effects.

Onshore works encompass cabling that crosses 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, notably within Barvas Moor, which is ecologically sensitive and serves as a significant carbon store. The lack of a comprehensive assessment of these impacts fails to provide a full understanding of the project's overall environmental footprint.

The application's decision to exclude or defer the assessment of onshore impacts inhibits a thorough evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all project components must be examined collectively. However, the disjointed consideration of offshore and onshore aspects means that the combined impacts on peatlands, habitats, and local communities remain inadequately understood.

Additionally, there are substantial risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application does not convincingly demonstrate that impacts on these habitats have been comprehensively evaluated, nor does it outline appropriate avoidance measures, leading to significant gaps in biodiversity protection.

Concerns are also raised regarding carbon balance due to the disturbance of peatland, which releases stored carbon and potentially incurs a carbon debt. This situation stands in opposition to the goals of renewable energy development. The application fails to address this matter adequately, nor does it show that the overall carbon balance is beneficial.

Furthermore, the routing of infrastructure through active croft land introduces possible conflicts with existing land use and legal rights. There is no evidence that the requisite consents or processes have been initiated, raising doubts about the project's deliverability and lawful implementation.

From a policy standpoint, the failure to assess the project holistically, alongside the inability to demonstrate protection for peatlands, habitats, and land use interests, contradicts the National Marine Plan and National Planning Framework 4. The lack of evidence regarding the avoidance or mitigation of impacts further undermines the application.

In summary, the disconnection of project components, the absence of a thorough assessment, and insufficient evidence related to environmental and land use impacts render this section of the application incomplete and unreliable, ultimately hindering a lawful determination.

TOURISM

The economy of the Isle of Lewis relies heavily on tourism, which has seen substantial growth, increasing from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. Given this dependence, the assessment of tourism impacts within the application is notably deficient, failing to

adequately evaluate the economic and social consequences for this critical sector. The application recognises that 86% of visitors are attracted by the area's scenery, yet it lacks a quantified assessment of how large-scale offshore infrastructure could potentially influence visitor numbers, behaviour, or overall economic contribution.

Moreover, the evaluation overlooks the vital role of environmental quality in supporting tourism. The significance of unspoiled landscapes and dark skies is critical to the visitor experience, particularly in emerging markets such as nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment further exacerbates this oversight, creating a considerable gap in understanding the impacts on a key and growing segment of the local economy.

In a community with limited economic diversification, the neglect of tourism impacts carries broader implications for employment, local businesses, and overall community sustainability. The lack of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been examined, as required under the Islands (Scotland) Act 2018.

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

In summary, the failure to quantify tourism impacts, to evaluate environmental influences on visitor behaviour, and to consider the island's economic dependency leads to a substantial evidential gap. This deficiency hinders a thorough evaluation of economic effects and suggests that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm presents a significant inadequacy in meeting the criteria for sustainable development when evaluated against statutory obligations, national policy, and evidential standards. It echoes the primary concerns that led to the rejection of the Lewis Wind Power proposal in 2008, wherein the unacceptable extent of industrialisation was highlighted. This current proposal, however, is put forward within a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

Moreover, the application lacks a comprehensive and reliable evidential basis essential for determination. There are substantial gaps in baseline data, the design envelope remains undefined, and there is an over-reliance on unspecified mitigation measures. Additionally, critical impact pathways concerning nocturnal wildlife, the full extent of onshore infrastructure, and potential tourism effects have been neglected. Consequently, the Environmental Impact Assessment is incomplete, hindering a thorough understanding of likely significant effects or residual impacts.

Procedural shortcomings are also evident. The failure to include a compliant Island Communities Impact Assessment is a breach of duty under the Islands (Scotland) Act 2018, while the incomplete Social Impact Assessment represents a significant omission. These issues obstruct the competent authority from adequately evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for consideration.

In terms of alignment with National Planning Framework 4, the proposal is at odds with its requirements. It does not demonstrate adequate protection of biodiversity, natural areas, and cultural heritage. Furthermore, it has not substantiated that health and wellbeing impacts are acceptable, nor has it provided evidence of net economic benefit due to the lack of tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore components has been insufficient, obscuring crucial effects on peatlands, carbon balance, habitats, and crofting land.

The environmental risks associated with this proposal remain ambiguous and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and contain internal inconsistencies. The evidential threshold necessary to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful determination of acceptable impacts.

Additionally, the proposal threatens to induce 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 adverse effects on tourism represent permanent impacts that cannot be sufficiently mitigated.

In light of these factors, the application is both procedurally and substantively unfit for determination. The breadth of informational deficiencies, coupled with conflicts in policy and unresolved environmental risks, obstructs a lawful, evidence-based decision. Therefore, it is imperative that the competent authority refuse consent on these grounds or invoke the appropriate regulatory measures to obtain the requisite missing information.

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

Additional Comments

I feel the turbines are too big & too close to shore

The island infrastructure isn't built to cope with influx of people required to build this project.

There are many environmental risks the project is going to cause, polluting the skies at day & night with lighting, polluting the waters around the turbines & releasing carbon

from peatlands will all have negative effects.

I don't feel the community benefit on offer are anywhere near sufficient for the loss of the natural beauty of our islands being destroyed. Loss of income to local business from tourism will also be affected.

Although local company's will benefit short term whilst the project is being built, long term all maintenance contracts will be sub contracted to mainland firms with little or no jobs for local people.

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: 4C8A8831

Member of the public 1355

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 concerns expressed are rooted in a thorough review of the Environmental Impact Assessment Report and accompanying documentation, highlighting significant planning, environmental, cultural, and procedural deficiencies.

The development site is situated off the west side of the Isle of Lewis, an area distinguished by its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. The proposal's scale, design, and proximity to the shoreline raise essential questions about its alignment with statutory requirements, national policy, and sustainable development principles.

Crucially, the application lacks a sufficient evidential basis for lawful determination. There is a notable absence of critical environmental data, with baseline information being both limited and inconsistent. Several key aspects of the proposal are still undefined, and the use of a flexible design framework obscures the likely significant effects. The reliance on unspecified mitigation measures further complicates the assessment, making it impossible to evaluate their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, and assertions regarding negligible or non-significant effects lack robust support.

Furthermore, there are clear and significant policy conflicts within the application. 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 adequately demonstrate compliance with national requirements aimed at safeguarding biodiversity, climate interests, and environmental integrity. These inconsistencies directly undermine the statutory tests necessary for consent and diminish the competent authority's ability to deem the development acceptable from a policy standpoint.

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is incomplete and does not provide a clear or accurate account of the likely environmental effects of the proposal. The reliance on a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations, creates significant uncertainty. This uncertainty hinders a consistent application of a worst-case scenario, compromising the integrity of the assessment and obscuring the true extent of environmental effects from both the public and the competent authority.

Furthermore, the application depends on mitigation measures, monitoring strategies, and management plans that are not yet defined. Seeking consent based on the premise that environmental harm will be managed later obstructs a meaningful evaluation of effectiveness and the assessment of residual impacts. Deferring crucial information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which stipulates that significant effects and mitigation must be clearly established before any determination is made.

In addition, there are substantial evidential gaps, including deficiencies in baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, especially where conclusions of negligible or non-significant effects lack robust supporting data. The failure to provide adequate information prevents a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot align with statutory requirements.

As a result, the application does not meet the evidential standards set by the Habitats Regulations, which require the exclusion of adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Moreover, the proposal does not demonstrate compliance with National Planning Framework 4, including biodiversity protection and environmental integrity requirements, as it has not been established that impacts have been fully assessed or that appropriate safeguards are in place.

Overall, the combination of an undefined design envelope, the absence of specified mitigation, and gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings impede a lawful and thorough assessment of environmental effects, leaving the competent authority unable to determine the application based on the information provided.

ASSESSMENT OF ALTERNATIVES

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

properly identified, assessed, and chosen over more damaging solutions.

There is a lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not show that the developer has genuinely considered placing turbines further offshore, where visual, ecological, and coastal impacts would likely be lessened. The significance of the West Lewis coastline and the critical role of proximity to shore in determining impact mean that the absence of such analysis hinders any conclusion that the proposed siting is the least damaging option.

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed development presents significant concerns regarding the adequacy of the assessment of marine ecology and protected species within the West Lewis coastal environment. This area is known for its sensitivity and biological activity, yet the provided baseline data is insufficient, and the methodologies employed fail to thoroughly capture species presence, behaviour, and habitat use. Consequently, the assessment does not deliver a reliable evidential basis for evaluating potential impacts.

A notable shortcoming is the treatment of otters, which are classified as a European Protected Species. The application does not appropriately acknowledge or assess their use of coastal areas for foraging and movement. By neglecting to consider their core foraging range and behavioural patterns, the potential effects of construction disturbances, noise, and increased activity have not been sufficiently evaluated. This oversight calls into question any conclusions drawn regarding the absence of significant effects on otters.

Furthermore, the assessment of basking sharks exhibits deficiencies, primarily due to reliance on aerial surveys that introduce considerable detection bias, particularly under Atlantic conditions. This reliance is likely to lead to an underestimation of the species' presence, particularly when compared to established land-based observations that indicate frequent usage of these waters. The failure to incorporate or adequately consider this relevant data results in an incomplete baseline, thereby undermining the reliability of the conclusions drawn.

These methodological inadequacies lead to assertions of negligible or non-significant effects that are based more on assumptions than on solid evidence. The lack of adequate baseline data further hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty regarding the actual level of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set out in the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been adequately identified or assessed. The uncertainty introduced by these shortcomings prevents the exclusion of adverse effects beyond reasonable scientific doubt and necessitates the application of the precautionary principle. In light of these factors, the granting of consent is not legally permissible.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is deeply flawed, characterised by significant internal inconsistencies and a lack of robust evidence, which undermines its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application fails to adequately demonstrate that these species will not suffer adverse effects. The proposed site lies within critical foraging areas and migratory pathways, yet the assessment neglects to thoroughly evaluate the risks of displacement, collision, and habitat loss.

Furthermore, a fundamental contradiction arises within the application: the developer asserts that no significant adverse effects will occur while simultaneously presenting a case for Habitats Regulations derogation, which is only warranted when significant harm is anticipated. This inconsistency raises serious concerns about the reliability of the assessment and suggests that its conclusions are not substantiated by the evidence provided. The assessment does not convincingly show that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The crucial nature of these feeding grounds is insufficiently considered,

and the reliance on modelling methods introduces uncertainty, particularly for declining species like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality rates, especially when baseline data is lacking and behavioural responses are not fully understood.

Additionally, the siting of turbines within a recognised migratory corridor poses a further significant risk, effectively obstructing a primary flight path for 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 effects on species with small global populations been considered. From a regulatory standpoint, the application does not meet the evidential threshold necessary to determine that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, precluding a lawful conclusion in favour of consent.

The deficiencies in the assessment also 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 unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence, all of which obstruct a thorough evaluation of impacts and affirm that the application does not fulfil the statutory requirements for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The cultural heritage assessment provided is fundamentally inadequate, failing to acknowledge the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply intertwined. The application adopts a limited perspective, viewing heritage merely as a collection of isolated, static assets, neglecting their ongoing social, cultural, and spiritual significance to the community.

A serious shortcoming of this assessment is its treatment of culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites of burial and spiritual practice. However, they are classified as static features within the assessment, which overlooks their continued relevance, usage, and the potential impact that development may have on their surroundings. This mischaracterisation leads to an incomplete evaluation of the cultural ramifications and disregards the cemeteries' essential role in community life.

The proposal also neglects intangible cultural heritage, such as the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These components are vital to the area's identity but have been omitted from the assessment, creating a significant gap. The cultural impact of the

development cannot be accurately understood without considering these essential elements.

Moreover, there are substantial concerns related to community rights and engagement. The Gaelic-speaking population, recognised as possessing a distinct cultural identity akin to that of Indigenous Peoples, has not been afforded the opportunity for Free, Prior and Informed Consent. This lack of meaningful engagement undermines the credibility of the assessment and fails to adhere to established principles concerning participation in decisions impacting cultural and environmental interests.

A critical procedural oversight is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the responsible authority cannot fulfil its legal obligation to assess the social, cultural, and economic repercussions on the island community. This significant omission renders any determination unlawful.

From a policy standpoint, these shortcomings place the application at odds with the National Planning Framework 4, particularly regarding the protection of historic assets and spaces. The neglect of both tangible and intangible heritage, as well as the failure to acknowledge living cultural practices, signifies a clear divergence from policy requirements.

Overall, the inability to assess living heritage, intangible cultural value, community rights, and statutory obligations results in a considerable evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application fails to provide a sound 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 significant and fundamentally undermines the evaluation's legality. Despite the developer commissioning a Social Impact Assessment, which included focus groups with local residents, the complete report remains unpublished. This lack of disclosure creates a substantial evidential gap, obstructing both public understanding and the ability of the competent authority to fully grasp the social risks highlighted by the developer's own research.

Summaries that are available indicate that residents are currently facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposal. These documented impacts stem from direct engagement and are not mere speculation. However, the absence of the complete assessment hinders the scrutiny of these findings and limits the capacity to evaluate their significance in the decision-making process.

Furthermore, there is an indication that the proposal is viewed as a direct threat to the community's identity and cohesion, with "cultural loss" identified in the developer’s own findings. Yet, these impacts have not been adequately incorporated into the main

application or given the appropriate weight they deserve. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of clarity significantly compromises the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is vital for developments of this magnitude, particularly where the character and functioning of the community may be at risk. The failure to provide the complete dataset means that the application does not furnish a thorough evidential basis for weighing the benefits against the harms.

From a policy standpoint, the application does not satisfactorily demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and mitigate harm; however, the existing evidence suggests adverse effects that have yet to be fully disclosed. Without the full assessment, compliance with this policy cannot be substantiated.

The procedural ramifications of this situation are considerable. The competent authority is unable to conduct a comprehensive socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This represents a material omission in the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, together with the evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This situation obstructs lawful determination and reinforces the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts and landscape changes is significantly inadequate, failing to capture the sensitivity of the West Lewis coastline, which is characterised by its open Atlantic horizon, undeveloped nature, and strong sense of remoteness. The proposed introduction of large-scale turbines near the shoreline would result in a continuous industrial presence, fundamentally transforming this landscape and causing permanent alteration.

The evaluation does not sufficiently convey the extent of the visual change that would arise. Given the scale and proximity of the turbines, they are poised to dominate views from residential areas, historic locations, and popular coastal sites. This would negatively affect visual amenity and diminish the natural and remote qualities that define the area. The assessment neglects to accurately reflect this level of impact and its significance within the context of such a vulnerable landscape.

Concerns also exist regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that the chosen viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly with

respect to important cultural heritage sites and valued landscapes. This raises the possibility that the visual impact may have been understated, thus questioning the reliability of the overall assessment.

Additionally, the relationship between landscape, seascape, and cultural heritage has not been thoroughly evaluated. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a wider landscape context linked by visual and spatial relationships to the Atlantic horizon. By treating these heritage assets as isolated entities, the assessment fails to appreciate their interdependence, leading to an incomplete understanding of how impacts affect their settings and cultural significance.

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

From a policy standpoint, the proposal contradicts National Planning Framework 4, especially concerning the protection of natural environments and historical assets. The magnitude of change is inconsistent with the need to preserve landscape character, visual amenity, and the settings of culturally important sites. The lack of a thorough worst-case assessment further weakens any assertion of policy adherence.

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

In summary, the assessment fails to accurately depict the impact scale, the environmental sensitivity, and the interconnectedness of landscape and heritage. These shortcomings undermine the ability to provide a reliable evaluation and underscore the conclusion that the proposal is incompatible with the need to protect this landscape.

CONSTRUCTION AND POLLUTION RISKS

The evaluation of construction and pollution risks lacks completeness and does not contain the necessary details for a thorough assessment of likely environmental effects. This proposal entails extensive seabed preparation and installation activities in a challenging Atlantic environment, yet it lacks fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it depends on mitigation and contingency measures that are to be formulated after consent, thereby obstructing any meaningful appraisal of their sufficiency or effectiveness.

This reliance on unspecified future actions is particularly alarming due to the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are susceptible to sediment disturbance and contamination.

Although the application recognises risks associated with sediment mobilisation and potential chemical or oil spills, it does not furnish adequate detail on how these issues will be averted, managed, or monitored.

Moreover, there exists uncertainty regarding the magnitude and behaviour of sediment plumes generated by seabed disturbance and cable installation. In the absence of robust modelling and explicitly defined management strategies, it is impossible to ascertain the extent, duration, or ecological implications of these effects. This uncertainty also pertains to the possible consequences for marine species and habitats that have already been designated as sensitive within the broader assessment.

The lack of thorough 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 introduces procedural risks and diminishes the competent authority's ability to assess environmental protection measures during the determination process.

From a regulatory standpoint, the postponement of essential environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be evaluated prior to granting consent, and in the absence of such information, a lawful decision cannot be reached. The application also fails to demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, absence of detailed management plans, and uncertainty surrounding potential impacts render the assessment fundamentally inadequate. These deficiencies hinder a comprehensive evaluation of construction and pollution risks and further affirm that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and an active fishing industry, which the application does not sufficiently protect or maintain from significant disruption. The assessment of fisheries and marine life lacks a robust evaluation of the ecological and socio-economic impacts involved. A critical concern lies in the application's assumption that fishing activities can be displaced without consequence. There is no evidence provided to show that alternative fishing grounds are available, accessible, or capable of sustaining the additional pressure that such displacement would entail. This lack of information is crucial, as it poses a risk of overfishing in other areas, potentially leading to wider economic implications for the local fishing fleet.

Moreover, the proposal raises substantial risks to marine species, especially due to underwater noise generated during construction activities. High-energy hammer piling is anticipated to create disturbances over extensive distances, adversely impacting species such as dolphins. The predicted disruption to a significant portion of the local bottlenose dolphin population generates serious concerns, yet these effects are

downplayed in the application without adequate supporting evidence.

The application contains a notable inconsistency where the necessity of licences to permit harm to European Protected Species is acknowledged, while simultaneously characterising impacts as negligible. This contradiction undermines the credibility of the assessment and raises issues regarding compliance with the Habitats Regulations, particularly where harm is foreseen that requires legal authorisation.

Additionally, the assessment neglects to consider cumulative impacts arising from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, it becomes impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal involves significant onshore infrastructure that is inadequately assessed and does not account for the comprehensive impacts of what constitutes a single integrated project. The separation of offshore turbines from onshore works leads to a disjointed evaluation, masking the true extent of environmental and socio-economic consequences.

Onshore activities encompass 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 necessitate excavation in areas of deep peat, particularly within Barvas Moor, a vital carbon store and ecologically delicate environment. The absence of a thorough assessment of these impacts hinders a full understanding of the project's overall environmental footprint.

The deferral of onshore impact assessments obstructs a proper appraisal of cumulative effects. The Environmental Impact Assessment process mandates a holistic consideration of all project elements; however, the disconnection between offshore and onshore components means that the combined effects on peatlands, habitats, and local communities remain unclear.

Moreover, there are considerable risks to sensitive habitats, including machair systems

and peatland ecosystems, which are afforded policy protection. The application fails to show that impacts on these habitats have been thoroughly evaluated or that effective avoidance measures have been put in place, highlighting a significant evidential gap in terms of biodiversity protection.

Concerns surrounding carbon balance also arise from the proposal. The disruption of peatland can release stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy initiatives. The application does not sufficiently address this issue or prove that the overall carbon balance remains advantageous.

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

From a policy standpoint, the failure to conduct a comprehensive assessment of the entire project and to demonstrate adequate protection of peatlands, habitats, and land use interests stands in conflict with the National Marine Plan and National Planning Framework 4. The inability to prove that impacts can be avoided or mitigated significantly weakens the application.

In summary, the fragmentation of project components, the incomplete assessment, and the lack of evidence concerning environmental and land use effects render this aspect of the application unreliable and incomplete, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding dark skies and nocturnal wildlife is a significant oversight in the Environmental Impact Assessment. The West Lewis coastline boasts exceptionally dark skies, which play a vital role in the area's environmental quality, cultural identity, and tourism appeal. The proposal includes permanent red aviation lighting that would be visible over long distances, resulting in a continuous and disruptive “wall of light” effect that would drastically change the night-time environment.

This application fails to evaluate how such lighting would impact visual amenity, landscape character, or the experiences of residents and visitors. This neglect is particularly troubling given the importance of dark skies to the local identity and the emerging tourism sector focused on astro-tourism. Consequently, there is a pronounced gap in the overall landscape and environmental assessment.

Moreover, there is no evaluation of the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are notably sensitive to artificial lighting due to their phototactic behaviour, which can cause disorientation and increase the risk of collisions. The application lacks any assessment

of lighting impacts or a phototaxis study, failing to address how aviation lighting could affect these species or potentially raise mortality rates.

This issue is further compounded by the dependence on daytime survey data in the ornithological assessment, which overlooks nocturnal activity and its associated risks. For instance, species like Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this risk has not been assessed. The absence of site-specific night-time data leaves a crucial gap in understanding ecological impacts.

Without an assessment of nocturnal effects, it is impossible to ascertain whether protected species or designated sites would suffer adverse impacts. The standard of evidence required to exclude such adverse effects beyond reasonable scientific doubt remains unmet, invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission contravenes the National Planning Framework 4 regarding the safeguarding of natural areas and environmental quality. Furthermore, it diminishes the comprehensive evaluation of landscape and seascape impacts, as the character of night-time is an essential element of the environment.

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

TOURISM

The assessment of tourism impacts within the application is fundamentally lacking and does not adequately address the economic and social implications for a vital sector of the Isle of Lewis's economy. Tourism relies heavily on the region’s natural attributes, including its wild coastline, near-pristine landscapes, dark skies, and the sense of remoteness that attracts visitors. While it is stated that 86% of tourists are drawn to the area for its scenery, the application fails to provide a quantifiable analysis of how the introduction of large-scale offshore infrastructure might influence visitor numbers, their behaviour, or the overall economic contribution of tourism.

Tourism has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and making up to 16% of the island's economy. However, the application does not evaluate how the potential industrialisation of the seascape and deterioration of environmental quality could affect Tourism Gross Value Added or the broader economic resilience of the island. Without this critical analysis, it remains unclear whether the proposed development would yield a net economic benefit or instead jeopardise this established and expanding sector.

Furthermore, the assessment neglects to examine the significance of environmental

quality in enhancing tourism. The unspoiled landscapes and dark skies are crucial to the visitor experience and are increasingly important in emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further highlights this oversight, creating a major gap in understanding the potential effects on a recognised and expanding component of the local economy.

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

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

In summary, the deficiencies in quantifying tourism impacts, assessing environmental influences on visitor behaviour, and recognising the island's economic dependencies lead to a significant evidential void. This hinders a comprehensive assessment of economic repercussions and supports the assertion that the application is incomplete.

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.

Additional Comments

This would be a disaster for the whole island not just the west coast. It would completely change a way of life forever. This scheme is not wanted or needed by the island community and the local authority totally misrepresented us by say we would welcome such a scheme.

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: 58C13CF4

Member of the public 1356

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, submitted in accordance with the relevant marine licensing and Environmental Impact Assessment processes. A careful review of the Environmental Impact Assessment Report and accompanying documents reveals significant deficiencies across planning, environmental, cultural, and procedural aspects. Located off the west side of the Isle of Lewis, this area is characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The scale and design of the proposal, combined with its proximity to the shoreline, lead to serious concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks an adequate evidential basis required for a lawful determination. There are critical gaps in environmental data, with limited and inconsistent baseline information, leaving many key aspects of the proposal undefined. The flexible design framework employed means that the potential significant effects cannot be clearly understood, while the reliance on unspecified mitigation measures prevents an assessment of their effectiveness. Consequently, the documents fail to provide a comprehensive understanding of the environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects are unsupported by robust evidence.

In addition, there are significant policy conflicts evident within the proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly concerning biodiversity, natural habitats, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests necessary for consent and weaken the competent authority's ability to determine the proposal as acceptable from a policy standpoint.

The unprecedented scale of the proposed wind farm, with large turbines situated close to the shoreline, raises serious issues relating to landscape capacity, visual impact, and overall environmental consequences. Collectively, the insufficiency of information, reliance on undefined mitigation, evidential weaknesses, and clear non-compliance with policy illustrate that the application is incomplete and unfit for lawful determination. In light of these circumstances, it is essential that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The proposal lacks a comprehensive and reliable Environmental Impact Assessment Report, which fails to adequately detail the potential environmental effects associated with the development. A flexible Project Design Envelope is utilised without clear commitments to specific turbine dimensions, layouts, or configurations. This introduces significant uncertainty and hinders the ability to apply a consistent worst-case scenario, ultimately undermining the integrity of the assessment. As a result, the impacts described may not accurately reflect the actual development, thereby obstructing both public and competent authority understanding of the true environmental effects.

Furthermore, the application is overly reliant on mitigation measures, monitoring strategies, and management plans that are not yet defined. This means that consent is sought on the assumption that any environmental harm will be managed at a later stage, which hampers meaningful evaluation of the effectiveness of these measures or assessment of any residual impacts. Such deferral of essential information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies be clearly established before determination.

There are also serious evidential gaps, including deficiencies in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This creates uncertainty about the scale and significance of impacts, especially in cases where conclusions of negligible or non-significant effects are made without robust supporting data. The lack of adequate information prevents a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot align with statutory requirements.

Consequently, the application does not satisfy the evidential threshold established under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially regarding protected species and sensitive habitats. The proposal also fails to comply with National Planning Framework 4, particularly in aspects related to biodiversity protection and environmental integrity, as it cannot be demonstrated that impacts have been thoroughly assessed or that suitable safeguards are in place.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The marine ecology and protected species assessment presents significant shortcomings, failing to deliver a complete or dependable understanding of ecological receptors in the West Lewis coastal environment. This area is known for its biological sensitivity and activity, yet the existing baseline data is inadequate, and the

methodologies employed do not effectively capture species presence, behaviour, and habitat use. Consequently, the assessment lacks a solid evidential basis for impact evaluation.

A notable gap is the treatment of otters, which are a European Protected Species. The application does not adequately recognise or assess their active use of coastal regions for foraging and movement. The oversight regarding their core foraging range and behavioural patterns means that the potential impacts of construction disturbance, noise, and increased activity have not been thoroughly examined, undermining any assertions of negligible effects on this species.

In assessing basking sharks, the reliance on aerial surveys has led to significant detection bias, particularly in Atlantic conditions. This methodology likely underrepresents the species' presence compared to established land-based observations that indicate frequent usage of these waters. The lack of incorporation of such data results in an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological flaws lead to conclusions of negligible or non-significant effects that are based more on assumptions than on solid evidence. Insufficient baseline data also hinders a meaningful assessment of cumulative and indirect impacts, including seasonal changes and broader ecosystem interactions. This situation creates uncertainty about the actual level of risk to marine species and habitats.

Regulatory compliance is also an issue, as the application does not adhere to the requirements of the Environmental Impact Assessment regime and National Planning Framework 4. The proper identification and assessment of protected species are lacking. The uncertainty created by these deficiencies prevents the dismissal of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Given these conditions, lawful consent cannot be granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions leads to an unreliable assessment. These issues obstruct a thorough evaluation of impacts on marine ecology and protected species, reinforcing the conclusion that the application is devoid of a sufficient evidential foundation.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of community identity and cultural heritage surrounding the West Lewis coastline is fundamentally insufficient, failing to acknowledge the area as a dynamic cultural landscape where the environment, language, tradition, and community are interwoven. The application adopts an overly simplistic view, treating heritage as a collection of isolated and static assets, rather than recognising their ongoing social, cultural, and spiritual roles within the community.

Notably, the treatment of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas, reveals a critical shortcoming. These sites serve as active

places of burial and spiritual engagement, yet the assessment categorises them merely as static features. This oversight neglects their continued use and significance, as well as the implications of development on their surroundings. Such mischaracterisation leads to an inadequate evaluation of cultural effects and overlooks their importance in community life.

Moreover, the application neglects to address intangible aspects of cultural heritage, such as the Gaelic language, traditional practices, and the enduring connection between the community and the coastal environment. These factors are vital to the area's identity but are conspicuously absent from the assessment, marking a significant omission. The absence of these considerations hinders a full understanding of the development's cultural impact.

Concerns extend to community rights and engagement, particularly with the Gaelic-speaking population, which possesses a unique cultural identity recognised as characteristic of Indigenous Peoples. The lack of a Free, Prior and Informed Consent process further undermines the credibility of the assessment, failing to align with established principles of participation regarding decisions that affect cultural and environmental interests.

Additionally, a critical procedural failure is evident in 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 examine the social, cultural, and economic effects on the island community, thus rendering any determination unlawful.

From a policy standpoint, these deficiencies place the proposal in direct contradiction to National Planning Framework 4, specifically concerning the protection of historic assets and locations. The neglect of both tangible and intangible heritage, as well as the failure to recognise living cultural practices, signifies a clear deviation from policy expectations.

In summary, the collective failure to evaluate living heritage, intangible cultural values, community rights, and legal obligations creates a considerable evidential gap. The cultural impacts associated with the development remain inadequately assessed, leaving the application lacking a solid foundation for gauging the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the Social Impact Assessment undermines the Environmental Impact Assessment process. It is essential to have a comprehensive understanding of social, economic, and health impacts for developments of this magnitude, particularly when community character and functionality may be affected. Without the complete dataset, the application fails to provide a solid evidential foundation for evaluating the balance between potential benefits and harm.

Moreover, the developer's own findings highlight that the proposal is perceived as a direct threat to community identity and cohesion, with "cultural loss" being identified. However, these impacts have not been adequately incorporated into the primary application or given the necessary consideration. This omission obscures the genuine human and social costs of the development.

The assessment of social impacts, health, and wellbeing is materially deficient and lacks the transparency required for a lawful evaluation. Although the developer commissioned a Social Impact Assessment that included focus groups with local residents, the full report has not been made public. This significant evidential gap hinders both the public and the competent authority from grasping the full extent of the social risks identified through the developer's research.

Available summaries indicate that residents are already experiencing measurable stress, anxiety, and concern stemming from the scale and proximity of the proposal. These impacts arise from direct engagement and are therefore not speculative. However, the inability to disclose the full assessment restricts proper scrutiny of the findings and limits the capacity to ascertain their importance within the decision-making process.

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

The procedural implications are profound. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This omission represents a material shortcoming within the application and fails to meet the evidential requirements of the Environmental Impact Assessment regime.

Taken together, the non-disclosure of the complete Social Impact Assessment, along with evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This situation prevents a lawful determination and strengthens the conclusion that the application is not backed by sufficient information.

CONSTRUCTION AND POLLUTION RISKS

The proposal entails extensive seabed preparation and installation works in a high-energy Atlantic environment, yet it lacks comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. This deficiency is alarming, particularly given that the application depends on future mitigation and contingency measures, which are to be formulated post-consent. Such an approach does not allow for a thorough assessment of their adequacy or effectiveness.

The environmental context is crucial; the West Lewis coastline is home to clean coastal

waters and significant habitats that are sensitive to sediment disturbance and contamination. Although the application acknowledges risks like sediment mobilisation and the possibility of accidental chemical or oil spills, it fails to provide adequate details on how these issues will be prevented, controlled, or monitored effectively.

Additionally, there is uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty raises concerns about potential effects on marine species and habitats that have already been identified as vulnerable in the wider assessment.

The situation is further exacerbated by the lack of detailed emergency response procedures. By postponing contingency planning until after consent has been granted, the application obstructs the evaluation of whether suitable safeguards are in place to manage pollution events. This introduces procedural risks and undermines the competent authority's capacity to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements established by the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation strategies be assessed prior to consent, as the absence of such information renders a lawful determination unfeasible. The application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the combination of undefined mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts significantly undermines the assessment. These deficiencies hinder a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the project’s onshore infrastructure is deficient and does not address the full range of impacts arising from what constitutes a single integrated development. The offshore turbines and the onshore works are inherently connected; however, they are evaluated independently. This separation leads to a disjointed analysis that fails to reveal the comprehensive environmental and socio-economic ramifications.

Key components of the onshore works comprise cabling across protected moorland, the construction of a substation in proximity to Stornoway, and necessary access infrastructure traversing sensitive landscapes. These activities necessitate excavation through areas of deep peat, notably within Barvas Moor, which serves as a significant carbon reservoir and is an ecologically delicate habitat. The application lacks a thorough examination of these impacts, thereby obstructing a complete understanding

of the project's overall environmental footprint.

By excluding or postponing the assessment of onshore impacts, the application hinders an accurate evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all facets of a project be evaluated collectively; thus, the division between offshore and onshore components results in an inadequate understanding of the combined impacts on peatlands, habitats, and local communities.

Furthermore, there are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are safeguarded under policy provisions. The application fails to demonstrate that these impacts have been comprehensively assessed or that suitable avoidance strategies have been implemented. This represents a significant evidential gap in relation to the protection of biodiversity.

Concerns surrounding the project's carbon balance are also prominent. Disturbances to peatland may release sequestered carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy initiatives. The application does not sufficiently address this concern or prove that the overall carbon balance remains advantageous.

Additionally, the routing of infrastructure through active croft land raises the potential for conflicts with current land use and legal rights. There is no evidence presented that the requisite consents or processes have been initiated, which brings into question the project's viability and lawful execution.

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

In summary, the division of project components, the lack of a thorough assessment, and insufficient evidence regarding environmental and land use impacts render this portion of the application incomplete and untrustworthy, which ultimately impedes a lawful determination.

TOURISM

The Isle of Lewis relies heavily on its tourism sector, which has seen remarkable growth 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. Despite this vital contribution, the assessment of tourism impacts within the application is significantly lacking, failing to address the economic and social consequences for this essential part of the local economy. The area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness are crucial to attracting visitors, yet the application acknowledges that 86% of visitors are drawn by scenery without providing any quantified evaluation of how large-scale offshore infrastructure might alter visitor numbers, behaviour, or overall

economic input.

The analysis does not model the potential repercussions of industrialising the seascape and deteriorating environmental quality on Tourism Gross Value Added or the island's broader economic resilience. Consequently, it remains unclear whether the proposed development would produce a net economic benefit or jeopardise a sector that is both established and growing. Furthermore, the critical role of environmental quality in supporting tourism has been overlooked, including the significance of unspoiled landscapes and dark skies for visitor experience, alongside emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, creating a notable gap in understanding its impact on a recognised and expanding segment of the local economy.

In an island community with limited economic diversification, the inadequate assessment of tourism impacts carries broader implications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been sufficiently evaluated, which is a requirement under the Islands (Scotland) Act 2018. From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, particularly regarding economic impact and the necessity to show net benefit. It also conflicts with strategic objectives that designate tourism as a priority growth sector and lacks the evidence needed for the competent authority to assess the economic consequences of the proposal.

Overall, the failure to quantify tourism impacts, evaluate environmental factors influencing visitor behaviour, and acknowledge the island's economic dependency results in a significant evidential gap. This deficiency hinders a thorough evaluation of the economic effects, leading to the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal raises significant concerns that cannot be overlooked. It fundamentally fails to meet the requirements for sustainable development as outlined by statutory duties, national policy, and evidential standards. This proposal echoes the issues that led to the rejection of the Lewis Wind Power application in 2008, where the unacceptable scale of industrialisation was a key factor. Presently, it is submitted within a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

Critical gaps exist in the evidential foundation upon which the application stands. There are inadequacies in the baseline data, and the design envelope remains undefined. Furthermore, the proposed reliance on unspecified mitigation measures and the omission of key impact pathways—including those affecting nocturnal wildlife, onshore infrastructure, and tourism—render the Environmental Impact Assessment incomplete. As a result, it hinders a comprehensive understanding of significant effects or residual impacts.

The proposal also faces procedural shortcomings, particularly the absence of a compliant Island Communities Impact Assessment, which contravenes the statutory duty established by the Islands (Scotland) Act 2018. Additionally, the failure to present a full Social Impact Assessment is a substantial omission. These deficiencies obstruct the competent authority from effectively evaluating impacts on community wellbeing, cultural identity, and economic resilience, ultimately deeming the application unsuitable for determination.

Contradicting the National Planning Framework 4, the proposal does not adequately safeguard biodiversity, natural places, or cultural heritage. It fails to demonstrate that impacts on health and wellbeing are acceptable, nor can it evidence a net economic benefit due to the lack of tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore elements has not been sufficiently conducted, concealing effects on peatlands, carbon balance, habitats, and crofting land.

The environmental risks presented remain uncertain and could be significant. Incomplete assessments regarding marine ecology, seabirds, protected species, and marine mammals contain inconsistencies. The evidential threshold required to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, which necessitates the application of the precautionary principle and prevents a lawful determination of acceptable impacts.

Moreover, the proposal would induce profound and irreversible alterations to a delicate landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, and disruption of cultural and visual relationships, along with the adverse effects on tourism, represent permanent changes that cannot be adequately mitigated.

In summary, the application is fundamentally unfit for determination, both procedurally and substantively. The multitude of information deficiencies, coupled with policy conflicts and unresolved environmental risks, obstructs the possibility of a lawful, evidence-based decision. It is imperative that the competent authority either refuses consent on these grounds or invokes the appropriate regulatory measures to mandate the provision of the necessary information.

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

Additional Comments

I feel the turbines are too big & too close to shore

The island infrastructure isn't built to cope with influx of people required to build this project.

There are many environmental risks the project is going to cause, polluting the skies at day & night with lighting, polluting the waters around the turbines & releasing carbon

from peatlands will all have negative effects.

I don't feel the community benefit on offer are anywhere near sufficient for the loss of the natural beauty of our islands being destroyed. Loss of income to local business from tourism will also be affected.

Although local company's will benefit short term whilst the project is being built, long term all maintenance contracts will be sub contracted to mainland firms with little or no jobs for local people.

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: E60BB473

Member of the public 1357

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. The application is submitted under the marine licensing and Environmental Impact Assessment regimes. A review of the Environmental Impact Assessment Report and related documents has revealed significant deficiencies in planning, environmental considerations, cultural impact, and procedural compliance. The wind farm is proposed to be located off the west side of the Isle of Lewis, which is characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

Concerns arise regarding the application's compliance with statutory requirements, national policy, and sustainable development principles. It lacks an adequate evidential basis for a lawful determination. There are critical environmental data gaps, with baseline information being both limited and inconsistent. Additionally, key aspects of the proposal are not clearly defined. The flexible design framework used complicates the assessment of likely significant effects, and the proposed mitigation measures have not yet been specified, making it impossible to evaluate their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and claims of negligible effects lack robust evidence.

There are notable conflicts with policy. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These conflicts are critical to the statutory tests required for consent and hinder the competent authority's ability to determine that the development is acceptable from a policy perspective.

The scale of this proposal is unprecedented for the area. The large turbines are planned to be positioned close to the shoreline, raising substantial concerns about landscape capacity, visual dominance, and environmental impact. In summary, the lack of sufficient information, dependence on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and unsuitable for a lawful determination. Therefore, the precautionary principle should be applied in this situation.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development fails to adequately assess the cultural heritage and community identity associated with the West Lewis coastline, which is a living cultural

landscape where environment, language, tradition, and community are interconnected. The application reduces heritage to a collection of isolated assets and neglects their ongoing social, cultural, and spiritual functions within the community.

Cemeteries at Dalmore, Bragar, and Barvas represent significant cultural sites that remain active places for burial and spiritual practice. However, the assessment mischaracterises these sites as static features, overlooking their current use, meaning, and the impact of development on their surroundings. This erroneous portrayal leads to an incomplete evaluation of cultural effects and disregards their vital role in community life.

Additionally, intangible cultural heritage, such as the Gaelic language and traditions, along with the enduring relationship between the community and the coastal environment, are omitted from the assessment. These elements are essential to the area's identity, and without their inclusion, the cultural impact of the development cannot be fully understood.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, which possesses a distinct cultural identity akin to that of Indigenous Peoples, has not been engaged through a process of Free, Prior and Informed Consent. This lack of meaningful participation undermines the credibility of the assessment and fails to adhere to established principles regarding involvement in decisions impacting cultural and environmental interests.

A significant procedural failure is the omission of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The absence of this assessment means that the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community, rendering any determination unlawful.

From a policy standpoint, these inadequacies conflict with National Planning Framework 4, particularly concerning the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage, along with the failure to recognise living cultural practices, clearly diverges from policy requirements.

Overall, the lack of assessment of living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential gap. The application does not adequately address the cultural impacts of the development, failing to provide a sound basis for understanding the true cultural cost associated with the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is inadequate and does not accurately capture the scale of change or the sensitivity of the surrounding environment. The West Lewis coastline is characterised by its open Atlantic horizon and undeveloped nature, contributing to a strong sense of remoteness. The proposed installation of large-scale turbines in proximity to the shoreline would create a

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

Moreover, the application falls short in conveying the magnitude of the visual change. Given their scale and proximity, the turbines would overshadow views from residential areas, historic sites, and popular coastal locations, thereby directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment does not sufficiently represent this level of impact or its significance in the context of such a sensitive landscape.

There are also concerns regarding the methodology employed in the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not fully depict the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This shortcoming suggests that the magnitude of visual impact may be understated, undermining the reliability of the assessment.

A significant gap exists in the evaluation of the interconnected relationships among landscape, seascape, and cultural heritage. Prominent sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape framework, linked by visual and spatial relationships to the Atlantic horizon. The assessment erroneously treats these sites as isolated, failing to acknowledge their interdependence, which results in an incomplete understanding of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal is at odds with National Planning Framework 4, particularly regarding the protection of natural places and historic assets. The extent of the proposed changes is inconsistent with the obligation to preserve landscape character, visual amenity, and the context of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertion of policy compliance.

It is also apparent that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be both dominant and unavoidable. Consequently, the resulting change is fundamentally permanent, rather than something that could be reduced to an acceptable level through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

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

This dependence on vague future strategies is particularly alarming given the sensitivity of the West Lewis coastline, which is home to clean coastal waters and significant habitats susceptible to sediment disruption and contamination. Although the application recognises risks such as sediment mobilisation and accidental chemical or oil spills, it does not adequately detail how these will be prevented, monitored, or controlled.

There is significant uncertainty concerning the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. In the absence of robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also extends to potential effects on already identified sensitive marine species and habitats.

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

From a regulatory standpoint, the postponement of essential environmental safeguards is at odds with the Environmental Impact Assessment requirements. The assessment of likely significant effects and mitigation should occur prior to granting consent; without this critical information, a lawful determination cannot be achieved. Additionally, the application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the absence of clearly defined mitigation measures, the lack of detailed management plans, and the uncertainty regarding potential impacts collectively render the assessment materially deficient. These flaws hinder a comprehensive evaluation of construction and pollution risks, further reinforcing the position that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry. However, the current application does not adequately address

the ecological or socio-economic impacts associated with its proposal. It fails to demonstrate how these vital habitats and activities can be preserved without causing significant disruption.

A critical flaw in the assessment is the assumption that fishing activities can simply be moved without any consequences. The application lacks evidence to suggest that alternative fishing grounds are available or that they could sustain the additional pressure resulting from this displacement. This oversight is crucial, as it could lead to overfishing in other areas and have detrimental economic effects on the local fishing fleet. Without a solid evidence base, the potential impacts on fisheries and livelihoods remain unclear.

The proposal poses considerable risks to marine species, particularly due to the underwater noise created during construction. The use of high-energy hammer piling for extended periods is likely to disturb marine life over significant distances, particularly affecting populations such as dolphins. The anticipated impact on a substantial portion of the local bottlenose dolphin population raises serious issues, yet the application inadequately addresses these concerns, lacking the necessary supporting evidence.

Additionally, there is an evident inconsistency within the application regarding the need for licenses to permit harm to European Protected Species, while simultaneously characterising these impacts as negligible. This contradiction severely undermines the assessment's credibility and raises questions about compliance with the Habitats Regulations, especially where expected harm necessitates legal approval.

Moreover, the assessment overlooks cumulative impacts stemming from various pressures, such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough evaluation of these interconnected effects, it is impossible to ascertain the overall impact on marine ecosystems and the socio-economic landscape.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The onshore infrastructure assessment is materially incomplete and does not account for the full extent of impacts from what constitutes a single integrated project. The

offshore turbines and the onshore works are intrinsically linked, yet they are evaluated separately, which leads to a fragmented approach that obscures the true scale of environmental and socio-economic effects. The proposed onshore components involve cabling across protected moorland, the construction of a substation near Stornoway, and related access infrastructure through sensitive landscapes. Specifically, excavation in areas of deep peat, particularly within Barvas Moor, poses significant risks, as this region is a crucial carbon store and ecologically sensitive habitat. The application fails to provide a comprehensive assessment of these impacts, thus hindering a complete understanding of the project's overall environmental footprint.

By omitting or deferring the assessment of onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project be examined collectively; however, the separation of offshore and onshore elements results in an incomplete understanding of the combined impacts on peatlands, habitats, and local communities. Moreover, there are substantial risks to sensitive habitats, such as machair systems and peatland environments, which are protected under policy. The application does not prove that these habitat impacts have been fully evaluated or that adequate avoidance measures are in place, thus highlighting a clear evidential gap regarding biodiversity protection.

Concerns also arise regarding the carbon balance; the disturbance of peatland is likely to release stored carbon, potentially incurring a carbon debt that contradicts the objectives of renewable energy development. The application inadequately addresses this issue and fails to demonstrate that the overall carbon balance remains beneficial. Additionally, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights, as the application lacks evidence that the necessary consents or processes have been initiated, raising doubts about deliverability and lawful implementation.

From a policy standpoint, the failure to assess the project in its entirety and to demonstrate the protection of peatlands, habitats, and land use interests conflicts with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated significantly undermines the application. Overall, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts render this part of the application incomplete and unreliable, which ultimately prevents a lawful determination.

TOURISM

The assessment of tourism impacts is significantly lacking, failing to consider the economic and social ramifications for a crucial sector of the Isle of Lewis economy. Tourism is heavily reliant on the area's wild coastline, nearly untouched landscapes, dark skies, and the overall sense of remoteness. While the application acknowledges that 86% of visitors are attracted by the scenery, it does not provide a quantified analysis of how the introduction of large-scale offshore infrastructure could influence

visitor numbers, behaviours, or the economic contributions overall.

Tourism has seen notable growth, escalating from £65 million in 2017 to over £81.5 million, which has supported more than 1,000 jobs and accounted for as much as 16% of the island's economy. However, the application neglects to model how the industrialisation of the seascape and the degradation of environmental quality might impact the Tourism Gross Value Added and broader economic resilience. The absence of such analysis prevents an informed determination on whether the development would yield a net economic benefit or harm an established and expanding sector.

Moreover, the assessment does not take into account the crucial role of environmental quality in bolstering tourism, particularly regarding the significance of unspoiled landscapes and dark skies to visitor experience, as well as the potential of emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this inadequacy, leaving a notable void in understanding the impacts on an acknowledged and burgeoning segment of the local economy.

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

From a policy standpoint, the application fails to illustrate compliance with National Planning Framework 4, especially regarding economic impact and the necessity to demonstrate net benefit. It also contradicts strategic objectives that recognise tourism as a priority growth sector, and fails to provide adequate evidence for the competent authority to evaluate the economic repercussions of the proposal.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development when evaluated against statutory duties, national policy, and evidential standards. It mirrors the critical issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the current application falls short.

There is a significant lack of comprehensive and reliable evidential support for the determination of this application. Key baseline data is missing, the design envelope

remains undefined, unspecified reliance on mitigation measures is noted, and important impact pathways have been overlooked, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is inadequate, failing to provide a thorough understanding of significant effects or residual impacts.

Procedural issues are also apparent. The omission of a compliant Island Communities Impact Assessment breaches statutory duty as per the Islands (Scotland) Act 2018, and the failure to reveal the complete 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.

Moreover, the proposal contradicts National Planning Framework 4, lacking adequate demonstration of biodiversity protection, natural places, and cultural heritage preservation. It does not establish that health and wellbeing impacts are acceptable, nor does it provide evidence of net economic benefits due to the absence of tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore elements is incomplete, obscuring effects on peatlands, carbon balance, habitats, and crofting land.

Uncertain and potentially significant environmental risks persist. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are both incomplete and inconsistent. The evidential threshold necessary to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and obstructing a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is procedurally and substantively unfit for determination. The considerable deficiencies in information, combined with policy inconsistencies and unresolved environmental risks, inhibit a lawful, evidence-based decision. Therefore, it is imperative that the competent authority either refuse consent based on these grounds or activate the appropriate regulatory measures to require the submission of the necessary information.

Thus, 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: 7CF9B25C

Member of the public 1358

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 the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a detailed review of the Environmental Impact Assessment Report and associated documentation, revealing several critical deficiencies related to planning, environmental considerations, cultural heritage, and procedural integrity. The site is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and significant cultural identity. The scope, design, and scale of the proposed development give rise to serious concerns regarding its alignment with statutory requirements, national policy, and sustainable development principles.

The application is fundamentally flawed due to the absence of a robust evidential basis necessary for a lawful determination. Essential environmental data is lacking, while the baseline information provided is both limited and inconsistent, leaving key elements of the proposal undefined. The employment of a flexible design framework hampers a clear assessment of likely significant effects, and the reliance on unspecified mitigation measures precludes any evaluation of their effectiveness. Consequently, the documentation does not furnish a comprehensive understanding of the potential environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsubstantiated by adequate evidence.

Moreover, there exist clear and substantive conflicts with existing policies. The proposal shows inconsistencies with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements aimed at safeguarding biodiversity, climate interests, and environmental integrity. These policy conflicts directly relate to the statutory tests required for consent and compromise the competent authority's ability to deem the development acceptable from a policy perspective.

In addition, the unprecedented scale of the proposal poses significant challenges, with large turbines located in close proximity to the shoreline, which raises profound concerns about landscape capacity, visual dominance, and environmental impact. Collectively, the lack of sufficient information, reliance on undefined mitigation measures, evidential shortcomings, and pronounced non-compliance with policy clearly indicate that the application is incomplete and insufficient to support a lawful determination. Under these circumstances, it is imperative that the precautionary principle be invoked.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is fundamentally flawed, failing to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are interlinked. Instead of appreciating heritage as an evolving entity with ongoing social, cultural, and spiritual significance, the application adopts a simplistic view that treats it as a collection of isolated, static assets.

There is a critical shortcoming in how culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are approached. These sites are active areas for burial and spiritual observance, yet the assessment overlooks their current use, meaning, and the potential impacts of development on their environment. This misrepresentation leads to an incomplete understanding of cultural implications, neglecting their integral role in community life.

Moreover, the assessment fails to address intangible cultural heritage elements, including the Gaelic language and traditions, as well as the long-standing relationship the community has with the coastal environment. These components are essential to the area's identity but are conspicuously absent from the evaluation, resulting in a significant gap. Without acknowledging these factors, the true cultural impact of the development remains obscured.

Concerns also arise regarding community rights and participation. The Gaelic-speaking population embodies a unique cultural identity characteristic of Indigenous Peoples; however, there has been no process for Free, Prior and Informed Consent. This lack of meaningful engagement compromises the assessment's validity and disregards established principles of community involvement in matters affecting cultural and environmental interests.

Compounding these issues is the failure to conduct a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without such an assessment, the competent authority is unable to fulfil its legal obligations to evaluate the social, cultural, and economic effects on the island community. This omission is a significant barrier to lawful decision-making.

From a policy standpoint, these shortcomings conflict with National Planning Framework 4, particularly regarding the safeguarding of historic assets and locations. The neglect of both tangible and intangible heritage, along with the disregard for living cultural practices, clearly diverges from established policy requirements.

Ultimately, the absence of a thorough evaluation of living heritage, intangible cultural values, community rights, and statutory responsibilities leads to a substantial evidential void. The cultural ramifications of the proposed development have not been adequately assessed, and the application fails to deliver a solid foundation for understanding the genuine cultural costs associated with the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

Moreover, the application does not fully portray the magnitude of this visual change. Given the size and proximity of the turbines, they would overshadow views from residential areas, historic sites, and frequently visited coastal locations. This would adversely affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not adequately articulate this level of impact or its importance within the context of such a delicate landscape.

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

Another significant shortcoming is the lack of consideration for the interconnected relationship between landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape that is visually and spatially linked to the Atlantic horizon. The assessment regards these as separate entities rather than acknowledging their interconnections, leading to an incomplete appraisal of impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal is at odds with National Planning Framework 4, which pertains to the protection of natural environments and historic assets. The scale of proposed changes is inconsistent with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertion of policy adherence.

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

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

FISHERIES AND MARINE LIFE

The evaluation of fisheries and marine life presented within the application is inadequate and does not facilitate a thorough understanding of ecological or socio-economic consequences. The waters off the West Lewis coast are home to a diverse marine ecosystem and host an active fishing industry, yet the application fails to substantiate that these activities and habitats can be protected or sustained without considerable disruption.

A critical concern is the presumption that fishing activity can be displaced without adverse effects. The application lacks evidence to support the claim that alternative fishing grounds are available, accessible, or capable of accommodating additional pressure. This gap is significant, as the risk of displacement could lead to overfishing in other areas and may have broader economic ramifications for the local fishing fleet. In the absence of a definitive and evidence-based evaluation, the implications for fisheries and livelihoods remain inadequately addressed.

Moreover, the proposal poses substantial risks to marine species, particularly due to the underwater noise resulting from construction activities. The use of high-energy hammer piling over prolonged periods is anticipated to cause disturbances across extensive distances, potentially impacting species such as dolphins. The predicted disturbance to a considerable portion of the local bottlenose dolphin population raises serious issues; however, the application appears to minimise the importance of these effects without adequate evidence to support such a position.

Inconsistencies within the application further complicate the assessment, as it acknowledges the necessity of licences to permit harm to European Protected Species while simultaneously characterising the impacts as negligible. This contradiction calls into question the reliability of the assessment and raises issues regarding adherence to the Habitats Regulations, particularly in instances where anticipated harm is significant enough to warrant legal authorisation.

The assessment also neglects to address cumulative impacts stemming from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough consideration of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not demonstrate compliance with 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 effects on marine biodiversity, thereby hindering the ability to conclude that the proposal aligns with the principles of sustainable development.

In summary, the deficiencies in the evidence regarding fishing displacement, the undervaluation of acoustic impacts, and the presence of internal contradictions render the assessment incomplete and untrustworthy. These shortcomings impede a robust evaluation of the impacts on marine life and fisheries.

TOURISM

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

Tourism has significantly increased, growing from £65 million in 2017 to over £81.5 million, while supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. However, the application does not explore how the industrialisation of the seascape and the resulting decline in environmental quality would affect Tourism Gross Value Added or the broader economic resilience of the area. Without this analysis, it is impossible to ascertain whether the development would provide a net economic benefit or harm a vital and expanding sector.

The assessment overlooks the significance of environmental quality in sustaining tourism. Unspoiled landscapes and dark skies are critical to visitor experiences and emerging markets, including nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a significant gap in understanding the impacts on a recognised and developing segment of the local economy.

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

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

Overall, the failure to quantify the impacts on tourism, evaluate the environmental factors that drive visitor behaviours, and consider the island's economic dependency leads to a considerable evidential gap. This hinders a thorough assessment of the economic effects and reinforces the conclusion that the application is incomplete.

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.

Additional Comments

I am writing to express my opposition to the proposed offshore wind farm in the seas surrounding the Isle of Lewis.

The Isle of Lewis is more than just where we live; it is our home, our heritage, and our identity. Our island has a unique culture, strong community ties, and a deep connection to the sea that has shaped generations of island life. The waters around Lewis are part of who we are, and any major industrial development in these seas would have a lasting impact on our way of life.

My main concern is the visual damage this development would cause. Lewis is known for its stunning, unspoiled seascapes and natural beauty. The sight of large turbines dominating the horizon would permanently change the character of our island, turning a natural landscape into an industrial one. This would affect not only residents, but also the many visitors who come here for the peace, beauty, and authenticity of the Hebrides.

I am also deeply concerned that our community will carry the burden of this development without seeing any real benefit from it. We would live with the visual impact, disruption, and loss of natural scenery, while the financial and energy benefits are likely to go elsewhere. It does not feel fair that island communities are expected to sacrifice so much while receiving so little in return.

Our culture, traditions, and connection to the sea are not things that can be replaced or compensated for. From our Gaelic heritage to fishing and crofting traditions, our identity is rooted in this landscape and seascape. Once industrialised, that sense of place is changed forever.

While I support the move toward renewable energy and understand the need to tackle climate change, I believe these developments must be done in a way that respects local communities and protects places of cultural and environmental importance. The Isle of Lewis is one of those places.

For these reasons, I strongly oppose the proposed offshore wind farm and urge decision-makers to consider the long-term impact on our community, culture, and landscape, and to protect the unique character of our island for future generations.

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: 32075DCF

Member of the public 1359

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the marine licensing and Environmental Impact Assessment regimes. A thorough review of the Environmental Impact Assessment Report and accompanying documentation reveals significant planning, environmental, cultural, and procedural deficiencies associated with the development. Located off the west side of the Isle of Lewis, the area is characterised by its Atlantic-facing coastline, near-pristine environment, and robust cultural identity. The proposal's scale, proximity to the shoreline, and design raise serious concerns about its compliance with statutory requirements, national policy, and the principles of sustainable development.

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

Moreover, the application shows clear conflicts with established policies. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The applicant has not sufficiently demonstrated compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These policy conflicts are directly relevant to the statutory tests required for consent and weaken the competent authority's ability to conclude that the development is acceptable in policy terms.

The unprecedented scale of the proposal, with large turbines situated close to the shoreline, raises substantial concerns about landscape capacity, visual dominance, and overall environmental impact. The combination of insufficient information, reliance on undefined mitigation measures, evidential weaknesses, and clear non-compliance with policy indicates that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and does not offer a comprehensive, clear, or trustworthy account of the potential environmental consequences of the proposed development. The reliance on a flexible Project Design Envelope, which lacks definitive turbine dimensions, layouts, or configurations, creates considerable uncertainty and hinders a reliable worst-case scenario analysis. This approach compromises the integrity of the assessment and implies that the projected impacts may not accurately represent the eventual development, which limits both public understanding and that of the competent authority regarding the actual environmental repercussions.

Furthermore, the application is heavily dependent on mitigation measures, monitoring strategies, and management plans that have yet to be articulated. As a result, consent is sought with the understanding that any environmental damage will be addressed later, which precludes any substantial assessment of effectiveness or residual impacts. This postponement of vital information to post-consent phases is procedurally unacceptable and contradicts the fundamental aims of the Environmental Impact Assessment framework, which stipulates that significant effects and mitigation strategies must be clearly outlined before any determination can be made.

Significant evidential shortcomings are also present, characterised by incomplete baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. Consequently, there is considerable uncertainty about the magnitude and significance of the impacts, particularly in cases where conclusions of negligible or non-significant effects are stated without adequate supporting data. The lack of sufficient information obstructs a clear assessment of cumulative and worst-case impacts and introduces scientific uncertainty that fails to align with statutory requirements.

As a result, the application does not satisfy the evidential standards mandated by the Habitats Regulations, which necessitate the exclusion of adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Moreover, the proposal does not demonstrate adherence to National Planning Framework 4, notably concerning biodiversity protection and environmental integrity, as it remains unproven that impacts have been comprehensively evaluated or that suitable safeguards are in place.

In conclusion, the combination of an undefined design envelope, lack of specified mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings obstruct a lawful and thorough evaluation of environmental effects, leaving the competent authority unable to make an informed decision based on the information available.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species fails to provide a complete or reliable understanding of the ecological receptors within the West Lewis coastal

environment. This area is a highly sensitive and biologically active marine system. However, the baseline data is incomplete, and the methodologies applied do not adequately capture the presence, behaviour, and habitat use of species. Consequently, the assessment lacks a sound evidential basis for evaluating impacts.

A significant omission is related to otters, a European Protected Species. The application does not properly recognise or assess their active use of coastal areas for foraging and movement. The oversight regarding their core foraging range and behavioural patterns means that the potential effects of construction disturbance, noise, and increased activity have not been adequately assessed, undermining any conclusions about the absence of significant effects on this species.

In addition, the assessment of basking sharks is deficient. The reliance on aerial surveys introduces significant detection bias, particularly under Atlantic conditions. This approach is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that indicate frequent use of these waters. The failure to incorporate or properly consider such data results in an incomplete baseline, weakening the reliability of the conclusions presented.

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

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

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

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 assessment of the seascape, landscape, and visual impacts is significantly inadequate, failing to capture both the extent of change and the sensitivity of the environment. The West Lewis coastline, characterised by its open Atlantic horizon and undeveloped nature, possesses a profound sense of remoteness. The proposed installation of large-scale turbines near the shoreline would impose a continuous industrial presence that fundamentally alters this unique character, leading to a

permanent and irreversible transformation of the landscape.

The application lacks an adequate representation of the magnitude of the visual changes that would occur. The size and proximity of the turbines would dominate views from residential areas, historical sites, and popular coastal locations, thereby directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment does not effectively communicate the significance of these impacts within the context of such a sensitive landscape.

Moreover, there are serious concerns regarding the choice and presentation of visual viewpoints. Evidence indicates that these viewpoints may not adequately reflect the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This oversight raises the possibility that the visual impacts have been underestimated, which further compromises the validity of the assessment.

A critical shortcoming is the failure to recognise the interconnected relationship between the landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape framework, connected visually and spatially to the Atlantic horizon. The assessment approaches these heritage assets as isolated entities, neglecting their interdependence and leading to an incomplete evaluation of the impacts on their context and cultural significance.

The proposed industrialisation of the seascape would disrupt these relationships, altering how heritage assets are perceived and severing their connections to the natural horizon. This constitutes not only a visual impact but also inflicts broader cultural and spatial damage that has not been sufficiently assessed within the application.

From a policy perspective, the proposal is at odds with National Planning Framework 4, which seeks to protect natural places and historic assets. The anticipated scale of change is inconsistent with the need to preserve landscape character, visual amenity, and the context of culturally significant sites. The lack of a thorough worst-case assessment further weakens any claims of compliance with policy requirements.

It is also evident that the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would result in an unavoidable and dominant presence. The changes involved are fundamental and permanent, rather than reducible to an acceptable level through mitigation measures.

In summary, the assessment fails to accurately reflect the extent of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These deficiencies hinder a reliable evaluation and support the conclusion that the proposal is incompatible with the protection of this landscape.

FISHERIES AND MARINE LIFE

The assessment of the application is fraught with significant deficiencies that directly impact marine ecosystems and local fishing industries. There is an alarming lack of a thorough evaluation regarding the ecological and socio-economic impacts on the diverse marine life and active fishing operations off the West Lewis coast. The assumption that fishing activities can be displaced without repercussions is particularly concerning. No evidence is presented to indicate the availability or accessibility of alternative fishing grounds, nor is there any indication that these grounds could support the additional fishing pressure, raising the risk of overfishing elsewhere and jeopardising the local fleet's economic stability.

Moreover, the proposal poses considerable risks to marine species, especially from the underwater noise created during construction. The anticipated high-energy hammer piling is likely to cause extensive disturbance, potentially affecting a significant portion of the local bottlenose dolphin population. Despite the gravity of these predictions, the application downplays the severity of such impacts, lacking sufficient supporting evidence.

Additionally, the application contains an internal inconsistency that warrants immediate scrutiny. While it acknowledges the necessity for licences to permit harm to European Protected Species, it simultaneously characterises these impacts as negligible. This contradiction not only undermines the credibility of the entire assessment but also raises serious questions about compliance with the Habitats Regulations, particularly when anticipated harm demands legal authorisation.

The failure to assess cumulative impacts is another critical shortfall. The assessment does not adequately consider the combined effects of habitat disturbance, noise pollution, and the displacement of fishing activities. This omission severely hampers the ability to ascertain the overall implications for marine ecosystems and the socio-economic conditions of the area.

From a policy perspective, there is a clear non-compliance with both the National Planning Framework 4 and the National Marine Plan. The application does not demonstrate that the proposed development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thus undermining the conclusion of sustainable development.

In summary, the myriad of deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the contradictions within the application collectively render the assessment incomplete and unreliable. These shortcomings hinder a proper evaluation of the impacts on fisheries and marine life, necessitating immediate action to address these critical issues.

TOURISM

The application presents a significant evidential gap by failing to adequately assess tourism impacts, which are vital for the Isle of Lewis economy. Tourism has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, which

supports more than 1,000 jobs and constitutes up to 16% of the island's economy. However, the assessment does not quantify how large-scale offshore infrastructure would affect visitor numbers, behaviour, or the overall economic contribution to the region.

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

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

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

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

In summary, the combined failures to quantify tourism impacts, assess environmental influences on visitor behaviour, and recognise the island’s economic dependency culminate in a significant shortfall in the analysis, undermining the robustness of the evaluation of economic effects and leading to the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal 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.

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: 0E2B95F8

Member of the public 1360

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 review of the Environmental Impact Assessment Report and its supporting documentation has revealed numerous material deficiencies across planning, environmental, cultural, and procedural domains. 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, proximity, and design of the wind farm raise significant concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks an adequate evidential basis necessary for a lawful determination. Important environmental data is absent, baseline information is both limited and inconsistent, and critical elements of the proposal remain unspecified. The employment of a flexible design framework hinders a clear understanding of likely significant effects. Additionally, the reliance on yet-to-be-defined mitigation measures means that their effectiveness cannot be evaluated. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects lack robust supporting evidence.

There are notable and significant policy inconsistencies. The proposal appears to conflict with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national obligations to protect biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests required for consent and compromise the ability of the competent authority to determine the development's acceptability in policy terms.

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The proposal relies on an Environmental Impact Assessment Report that is materially deficient, failing to deliver a full, transparent, or reliable account of the likely environmental effects. A flexible Project Design Envelope has been employed, which lacks commitment to specific turbine dimensions, layouts, or configurations. This introduces significant uncertainty and obstructs the consistent application of a worst-case scenario, ultimately undermining the integrity of the assessment. Consequently, the impacts presented may not accurately reflect the development that is ultimately constructed, leaving both the public and the competent authority unable to grasp the true extent of environmental effects.

Significantly, the application depends heavily on mitigation measures, monitoring strategies, and management plans that are yet to be defined. Consent is sought under the premise that environmental harm will be addressed later, which obstructs any meaningful evaluation of effectiveness or assessment of residual impacts. This deferral of critical information to post-consent stages is procedurally unacceptable and fundamentally contradicts the purpose of the Environmental Impact Assessment regime, which necessitates the clear establishment of likely significant effects and mitigation prior to determination.

The report is further compromised by considerable evidential deficiencies, such as gaps in baseline data and limitations in methodology, along with a reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, particularly when conclusions of negligible or non-significant effects are made without robust supporting data. The lack of sufficient information hinders a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot align with statutory requirements.

As a result, the application does not meet the evidential threshold established under the Habitats Regulations, failing to exclude adverse effects beyond reasonable scientific doubt. This raises concerns in relation to the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it remains unproven that impacts have been fully assessed or that appropriate safeguards are in place.

In conclusion, the dependence on an undefined design envelope, the absence of specified mitigation, and the existing gaps in baseline data make the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings prevent a lawful and robust assessment of environmental effects and indicate that the competent authority lacks the necessary information to determine the application effectively.

ASSESSMENT OF ALTERNATIVES

The application significantly fails to meet the statutory requirements of the Environmental Impact Assessment regime due to an inadequate assessment of

alternatives. Instead of offering a structured comparison of viable options based on environmental effects, it provides a narrative of project evolution. This method does not sufficiently demonstrate that less harmful alternatives have been identified and evaluated in favour of more damaging options.

There is a notable absence of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not show that the developer has seriously considered positioning turbines further offshore, where potential visual, ecological, and coastal impacts could be diminished. The sensitivity of the West Lewis coastline highlights the critical importance of proximity to shore in assessing impact, and the lack of this analysis makes it impossible to conclude that the proposed siting is the least damaging available option.

The inadequacies further extend to cable routing and landfall evaluation, where there is insufficient evidence to suggest that alternative routes have been adequately explored to avoid or mitigate impacts on sensitive receptors, including culturally and spiritually significant locations like Barvas Cemetery. The failure to present a clear avoidance strategy or comparative analysis implies that mitigation by design has not been employed, relying instead on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through thoughtful site selection, layout decisions, and infrastructure routing. This oversight represents a breach of the established mitigation hierarchy and prevents the competent authority from assessing whether more suitable and less harmful alternatives are available. Without a thorough alternatives assessment, it is impossible to conclude that the proposal constitutes a sustainable or policy-compliant solution.

From a policy viewpoint, this inadequacy undermines alignment with National Planning Framework 4, particularly concerning the protection of natural areas, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a significant 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 proposed development fails to adequately assess the cultural heritage and community identity of the West Lewis coastline, which is a living cultural landscape intimately connected with environment, language, tradition, and community. The application reduces heritage to isolated, static assets, neglecting their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming is the inadequate treatment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet the assessment regards them merely as static features. This oversight ignores their continued significance and the impact of

development on their surroundings, leading to an incomplete evaluation of cultural effects and a disregard for their importance in community life.

Moreover, the assessment overlooks intangible cultural heritage, including the Gaelic language, traditions, and the deep-rooted relationship between the community and the coastal environment. These aspects are vital to the area's identity but are not addressed, indicating a substantial omission. Without considering these elements, the cultural impact of the development remains poorly understood.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity, recognised as characteristics of an Indigenous People. However, there has been no process of Free, Prior and Informed Consent, which undermines the validity of the assessment and fails to adhere to established principles of participation concerning cultural and environmental interests.

Additionally, a critical procedural failure is evident in 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, rendering a lawful determination impossible.

From a policy standpoint, these inadequacies place the proposal in direct conflict with National Planning Framework 4, especially regarding the protection of historic assets and places. The neglect of both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, signifies a clear deviation from policy requirements.

In summary, the deficiencies in assessing living heritage, intangible cultural value, community rights, and statutory obligations create a substantial evidential gap. The cultural impacts of the development have not been thoroughly examined, and the application lacks a solid foundation for evaluating the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The failure to publish the full Social Impact Assessment commissioned by the developer represents a significant evidential gap in the planning application. This gap hinders the public and competent authorities from understanding the full extent of social risks identified through the developer’s own research. Summaries suggest that local residents are already experiencing measurable levels of stress, anxiety, and concern due to the proposal’s scale and proximity. These impacts stem from direct engagement with the community and are therefore factual rather than speculative. However, without access to the complete assessment, there is insufficient scrutiny of the findings, which limits the determination of their significance in the decision-making process.

Furthermore, evidence indicates that the proposal threatens community identity and cohesion, with the developer acknowledging “cultural loss” in their findings. Despite

the recognition of these impacts, they have not been fully integrated into the main application or given the appropriate weight they deserve. The withholding of the complete Social Impact Assessment obscures the true human and social costs associated with the development, which is crucial information for stakeholders.

The absence of transparency also undermines the Environmental Impact Assessment process, as a thorough understanding of the social, economic, and health impacts is essential for developments of this nature, particularly when community character and functioning are at stake. By failing to provide the complete dataset, the application lacks a comprehensive evidential basis required to assess the balance between the proposed benefits and potential harms.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments are required to support positive health outcomes and to avoid causing harm, yet the available evidence highlights existing adverse effects that have not been fully disclosed. Without the complete assessment, it is impossible to verify adherence to this policy.

The procedural ramifications of this non-disclosure are significant. The competent authority is unable to conduct a robust socio-economic and health evaluation without access to the full Social Impact Assessment. This omission constitutes a material shortcoming in the application and represents a failure to meet the evidential requirements set forth by the Environmental Impact Assessment regime.

In summary, the lack of disclosure regarding the full Social Impact Assessment, coupled with documented evidence of existing adverse impacts, results in an incomplete and unreliable assessment. This situation prevents a lawful determination and reinforces the conclusion that the application does not possess sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development involves the introduction of large-scale turbines along the West Lewis coastline, which is characterised by its open Atlantic horizon, undeveloped nature, and profound sense of remoteness. This change would create a continuous industrial presence in close proximity to the shoreline, fundamentally transforming the landscape and leading to a permanent and irreversible alteration of its character.

The application does not sufficiently convey the extent of the anticipated visual change. The scale and location of the turbines would dominate the views from residential areas, historic sites, and popular coastal spots, directly impacting visual amenity and diminishing the qualities of naturalness and remoteness that define the area. The current assessment fails to adequately communicate the significance of this impact in light of the sensitivity of the landscape.

Concerns arise regarding the methodology used to select and present visual viewpoints. Evidence indicates that these viewpoints may not accurately reflect the

most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. Such a shortcoming risks underestimating the magnitude of visual impact, which casts doubt on the credibility of the assessment.

Moreover, the assessment neglects to evaluate the interconnectedness of landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are situated within a broader landscape context, interconnected through visual and spatial relationships with the Atlantic horizon. The treatment of these heritage assets as isolated entities overlooks their interdependence, leading to an incomplete understanding of the impacts on their settings and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are perceived and diminishing their connection to the natural horizon. This not only constitutes a visual concern but also inflicts broader cultural and spatial harm that remains inadequately addressed in the application.

From a policy standpoint, the proposal is at odds with National Planning Framework 4 regarding the safeguarding of natural spaces and historic assets. The proposed scale of change is incompatible with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further detracts from any assertions of policy compliance.

Additionally, it is evident that the identified impacts are unlikely to be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelming and inescapable. The resulting alterations to the landscape are fundamental and permanent, rather than amenable to reduction through mitigation measures.

In summary, the assessment does not accurately portray the extent of the impact, the environmental sensitivity, or the interconnectedness of the landscape and heritage. These shortcomings preclude a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal involves significant seabed preparation and installation works in a high-energy Atlantic environment, but the assessment of construction and pollution risks is incomplete. 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 after consent is granted, which hinders any meaningful evaluation of their adequacy or effectiveness.

This situation is particularly alarming given the sensitive nature of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental

chemical or oil spills, it fails to detail how these risks will be prevented, controlled, or monitored.

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

The lack of detailed emergency response procedures intensifies these issues. By postponing contingency planning to a post-consent stage, the application obstructs any evaluation of whether the necessary safeguards are in place to address pollution events. This introduces procedural risks and undermines the competent authority's capacity to assess environmental protection measures at the determination stage.

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

Collectively, the lack of defined mitigation measures, inadequate management plans, and uncertainty about potential impacts result in a materially deficient assessment. These issues obstruct a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application proposes a development that inadequately assesses the impacts on fisheries and marine life, failing to provide a thorough evaluation of both ecological and socio-economic consequences. The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry, yet the proposal does not demonstrate how these vital uses and habitats will be safeguarded against significant disruption.

A critical concern is the assumption made by the application that fishing activities can be shifted without adverse effects. There is no evidence presented to suggest that alternative fishing grounds exist, are accessible, or can accommodate additional fishing pressures. This lack of information is crucial, as the displacement of fishing efforts could lead to overfishing in other areas, posing broader economic risks to the local fishing fleet. The absence of a clear, evidence-based evaluation means that the repercussions for fisheries and livelihoods remain unclear.

Furthermore, the proposal carries considerable risks for 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 across substantial distances, affecting species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises important concerns. However, the application appears to downplay the seriousness of these impacts, lacking adequate supporting evidence.

Additionally, there is a notable inconsistency within the application itself, where the necessity for licences to permit harm to European Protected Species is acknowledged, while simultaneously claiming that the impacts are negligible. This contradiction undermines the assessment's credibility and raises questions about adherence to the Habitats Regulations, especially where anticipated harm warrants legal authorisation.

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

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

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

TOURISM

The application presents significant deficiencies in its assessment of tourism impacts, neglecting to evaluate both the economic and social consequences for a crucial sector of the Isle of Lewis economy. It is vital to recognise that tourism relies heavily on the region's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness. Although the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide a quantified assessment of how the proposed large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution from tourism.

Tourism on the Isle of Lewis has experienced substantial growth, with its value increasing from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the island’s economy. Despite this positive trend, the application does not adequately model the potential impact of industrialising the seascape or the loss of environmental quality on Tourism Gross Value Added and overall economic resilience. Without this crucial analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or jeopardise an established and burgeoning sector.

Furthermore, the assessment overlooks the critical role that environmental quality plays in bolstering tourism. It fails to consider the significance of unspoiled landscapes and dark skies for the visitor experience, particularly for emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this inadequacy, leaving a considerable gap in understanding the impact on a recognised and expanding segment of the local economy.

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

From a policy standpoint, the application fails to demonstrate alignment with the National Planning Framework 4, especially concerning economic impact and the necessity to show net benefits. It contradicts strategic objectives that designate tourism as a priority growth sector and does not furnish adequate evidence for the competent authority to evaluate the economic repercussions of the proposal.

In summary, the deficiencies in quantifying tourism impacts, assessing environmental factors that influence visitor behaviour, and considering the island's economic dependency result in a significant evidential gap. This lack of thorough analysis obstructs a comprehensive evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm does not meet the requirements for sustainable development. It fails to satisfy statutory duties, national policy, and evidential standards. This application presents the same core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. Now, despite being presented under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it still falls short.

The application lacks a complete and reliable evidential basis for determination. There are significant gaps in the baseline data, an undefined design envelope, unspecified mitigation measures, and missing key impact pathways, including effects on nocturnal wildlife, full onshore infrastructure, and tourism. As a result, the Environmental Impact Assessment is incomplete, preventing a clear understanding of likely significant effects or residual impacts.

Procedural failures are evident as well. The absence of a compliant Island Communities Impact Assessment breaches statutory duty under the Islands (Scotland) Act 2018. Furthermore, the failure to disclose the full Social Impact Assessment is a material omission. These shortcomings hinder the competent authority from properly

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

The proposal conflicts with National Planning Framework 4. It does not demonstrate adequate protection of biodiversity, natural places, and cultural heritage. It fails to show that health and wellbeing impacts are acceptable and cannot provide evidence of a net economic benefit due to a lack of tourism impact modelling. The cumulative impacts of both offshore and onshore elements have not been adequately assessed, obscuring their effects on peatlands, carbon balance, habitats, and crofting land.

There are uncertainties regarding environmental risks that could be significant. Assessments of marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt has not been met. This situation engages the precautionary principle and prevents a lawful conclusion that impacts are acceptable.

Additionally, the proposal would result in 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 impacts on tourism are permanent effects that cannot be adequately mitigated.

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

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

Additional Comments

I am writing as a resident of the Isle of Lewis to formally object to the proposed wind farm development.

The Isle of Lewis is widely recognised for its unique natural beauty, cultural heritage, and unspoilt landscapes. These qualities are not only central to our identity as a community but are also vital to our local economy, particularly tourism. Visitors are drawn to the island for its sense of remoteness, tranquillity, and scenic views. The introduction of large-scale wind turbines risks significantly altering this landscape, potentially deterring visitors and negatively impacting local businesses that rely on tourism.

I am also concerned about the impact on residential amenity. The island is characterised by low background noise levels, and the addition of turbine noise—both audible and low-frequency—has the potential to disrupt the peace and quiet that

residents currently enjoy. This could affect overall wellbeing and quality of life, particularly in rural and coastal areas.

While I recognise and support the importance of renewable energy, it is essential that developments are appropriately sited. The Isle of Lewis is an environmentally sensitive area, with important habitats and wildlife that could be affected by construction and operation. Careful consideration must be given to the cumulative environmental impact, including potential effects on bird populations and peatland ecosystems.

I believe that this proposal places a disproportionate burden on our island community while offering limited direct benefit locally. Renewable energy development should not come at the cost of the very landscapes and environments that make places like Lewis special.

For these reasons, I respectfully urge that this proposal be reconsidered and that alternative, less sensitive locations be explored.

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: 45AD82B1

Member of the public 1361

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a review of the Environmental Impact Assessment Report and its accompanying documents, highlighting material deficiencies in planning, environmental considerations, cultural impacts, and procedural adherence. The development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. Concerns surrounding the scale, proximity, and design of the proposal raise fundamental questions regarding its alignment with statutory requirements, national policy, and the principles underpinning sustainable development.

The application lacks an adequate evidential foundation necessary for a lawful determination. There are notable gaps in critical environmental data, and the baseline information presented is both limited and inconsistent. Furthermore, key aspects of the proposal remain undefined, and the use of a flexible design framework complicates the understanding of likely significant effects. The reliance on unspecified mitigation measures renders their effectiveness impossible to evaluate. Consequently, the documentation fails to provide a comprehensive or informed understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust evidential support.

Substantive policy conflicts are evident throughout the proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not adequately demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These discrepancies directly affect the statutory tests necessary for consent and undermine the capacity of the competent authority to determine the development's acceptability in policy terms.

The unprecedented scale of the proposal raises significant issues, with large turbines planned in close proximity to the shoreline, which introduces serious concerns about landscape capacity, visual dominance, and overall environmental impact. In summary, the combination of insufficient information, dependence on undefined mitigation measures, evidential weaknesses, and clear non-compliance with policy illustrates that the application is incomplete and unfit to support a lawful determination. Given these circumstances, it is essential that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks essential detail and fails to provide a full and reliable account of the potential environmental consequences of the proposal. There are significant evidential deficiencies, including gaps in baseline data and a reliance on assumptions rather than site-specific evidence. Such shortcomings lead to uncertainty about the scale and significance of impacts, particularly in cases where negligible or non-significant effects are suggested without robust supporting data. This lack of sufficient information hinders a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that conflicts with statutory requirements.

Moreover, the application's heavy reliance on mitigation measures, monitoring strategies, and management plans that are yet to be defined is troubling. Seeking consent on the basis that environmental harm will be addressed later prevents any meaningful evaluation of the effectiveness of these measures and obstructs the assessment of residual impacts. This postponement of crucial information until post-consent stages is procedurally unacceptable and contradicts the intent of the Environmental Impact Assessment regime, which stipulates that significant effects and mitigation must be clearly established before any determination.

The undefined Project Design Envelope compounds these issues by introducing uncertainty regarding specific turbine dimensions, layouts, and configurations. This lack of commitment prevents a consistent application of a worst-case scenario, undermining the integrity of the assessment. Consequently, the impacts presented may not accurately reflect the final development, hindering both public understanding and the competent authority's ability to gauge the true extent of environmental effects.

Together, these factors mean that the application does not satisfy the evidential threshold mandated under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to comply with National Planning Framework 4, particularly in relation to biodiversity protection and environmental integrity, as it remains unclear whether impacts have been fully assessed or appropriate safeguards established.

Overall, the combination of an undefined design envelope, absence of specific mitigation, and gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies obstruct a lawful and robust assessment of environmental effects, leaving the competent authority unable to make an informed determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The proposed development lacks a sufficient assessment of alternatives, failing to satisfy the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of viable alternatives based on their environmental impacts, the application presents a narrative focused on the project's evolution. This method does not adequately demonstrate that less harmful

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

Furthermore, there is an absence of transparent, evidence-based comparisons of different offshore locations, development scales, or design configurations. Notably, the application does not show that the developer has genuinely considered positioning the turbines further offshore, which could potentially lessen visual, ecological, and coastal impacts. Given the sensitive nature of the West Lewis coastline and the critical role of proximity to shore in assessing impact, the lack of this analysis undermines the assertion that the proposed siting is the least damaging option available.

The shortcomings are also evident in the evaluation of cable routing and landfall, where there is inadequate evidence that alternative routes have been explored to mitigate impacts on sensitive receptors. This includes significant areas such as Barvas Cemetery, which hold cultural and spiritual importance. The failure to present a clear avoidance strategy and to conduct a comparative analysis indicates a lack of application of mitigation by design, 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 failure to adhere to the established mitigation hierarchy hinders the competent authority's ability to ascertain whether less harmful and more suitable alternatives are available. The absence of a thorough alternatives assessment raises doubts about the sustainability and policy compliance of the proposal.

From a policy standpoint, this inadequacy compromises adherence to National Planning Framework 4, particularly concerning the protection of natural environments, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a significant omission that leads to the conclusion that the application has not undergone adequate evaluation and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

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

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

Furthermore, there are deficiencies in the assessment of basking sharks due to reliance

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

The methodological flaws result in conclusions of negligible or non-significant effects being based on assumptions rather than solid evidence. The lack of adequate baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This leads to uncertainty regarding the actual risks to marine species and habitats.

From a regulatory standpoint, the application does not comply with the Environmental Impact Assessment requirements or the National Planning Framework 4, as it has not properly identified or assessed protected species. The uncertainty introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt and necessitates the application of the precautionary principle. In light of this, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment provided is fundamentally unreliable, featuring significant internal inconsistencies and substantial gaps in evidence that undermine its conclusions. It fails to adequately demonstrate that internationally important seabird populations, many of which are already in decline, will not be adversely affected by the proposed development on the west coast of the Isle of Lewis. This area includes key foraging zones and migratory pathways, yet the assessment does not properly evaluate the risks associated with displacement, collision, or habitat loss.

A critical contradiction exists within the application; while the developer asserts that there will be no significant adverse effects, they also pursue a Habitats Regulations derogation case, which is only relevant where significant harm is anticipated. Such inconsistencies raise serious doubts about the credibility of the assessment and suggest that its conclusions lack the necessary supporting evidence.

The evidence presented is insufficient to assure that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The assessment does not fully account for the significance of these feeding grounds, and its reliance on modelling techniques introduces uncertainty, particularly concerning species that are experiencing severe decline, like Kittiwakes and Fulmars. Methodologies used in the assessment are likely to underestimate mortality, especially given the incomplete

baseline data and the lack of understanding regarding behavioural responses.

Moreover, the siting of turbines within a recognized migratory corridor poses an additional and substantial risk, as it effectively creates a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor are not adequately assessed, nor are the potential effects on species with relatively small global populations.

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

These deficiencies also constitute a failure to adhere to National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally significant seabird populations will remain unaffected places the proposal in direct conflict with national policy.

Overall, the assessment's weaknesses in methodology, evidence, and internal consistency lead to the conclusion that it does not fulfill the statutory requirements necessary for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development raises significant concerns regarding the cultural heritage and community identity associated with the West Lewis coastline. The assessment fails to recognise this area as a dynamic cultural landscape where the environment, language, tradition, and community interconnect. Instead, it adopts a reductive view that treats heritage merely as a collection of isolated and static assets, neglecting their ongoing social, cultural, and spiritual roles within the community.

A notable shortcoming of the assessment is its treatment of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active locations for burial and spiritual practices, yet the evaluation categorises them as static features without regard for their continued use and meaning. This mischaracterisation compromises a thorough evaluation of cultural impacts and overlooks their significance within community life.

The assessment also disregards intangible cultural heritage elements, such as the Gaelic language and local traditions, along with the long-standing relationship between the community and the coastal environment. These components are vital to the identity of the area but have been entirely omitted from the assessment, leading to a critical gap in understanding the cultural implications of the development.

Concerns regarding community rights and engagement further complicate the

application. The Gaelic-speaking population is recognised as possessing a distinct cultural identity akin to that of Indigenous Peoples; however, the absence of a Free, Prior and Informed Consent process undermines the integrity of the assessment. This lack of meaningful engagement fails to adhere to established principles of participation in decisions impacting cultural and environmental interests.

Moreover, a significant procedural failure is evident in the lack of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The omission of this assessment impedes the competent authority's ability to fulfil its legal obligation to evaluate the social, cultural, and economic effects on the island community, thus hindering lawful determination.

From a policy standpoint, the deficiencies in the assessment place the proposal in opposition to the National Planning Framework 4, particularly concerning the safeguarding of historic assets and places. The neglect to consider both tangible and intangible heritage, as well as the failure to acknowledge living cultural practices, constitutes a clear deviation from established policy requirements.

In summary, the assessment's inadequacies in addressing living heritage, intangible cultural values, community rights, and statutory obligations result in a substantial evidential gap. The cultural impacts of the development remain inadequately assessed, rendering the application insufficient for evaluating the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal presents significant challenges regarding the assessment of social impacts, health, and wellbeing, which are materially deficient and lack the necessary transparency for lawful evaluation. Although the developer commissioned a Social Impact Assessment that included focus groups with local residents, the full report has not been made available. This omission creates a substantial evidential gap, hindering both public understanding and the competent authority's ability to grasp the complete range of social risks highlighted by the developer's own research.

Residents are already reporting measurable levels of stress, anxiety, and concern associated with the scale and proximity of the proposed development. These impacts stem from direct engagement and are not mere speculation. The failure to disclose the full assessment limits the capacity for thorough scrutiny of the findings and restricts the evaluation of their significance within the overall decision-making process.

Moreover, there is clear evidence suggesting that the proposal is viewed as a direct threat to community identity and cohesion, with “cultural loss” cited among the developer’s findings. However, these impacts have not been sufficiently integrated into the main application nor afforded the appropriate weight they deserve. The withholding of the complete Social Impact Assessment obscures the true social and human costs associated with the development.

This lack of transparency adversely affects the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health ramifications is vital for developments of this magnitude, particularly when they may disrupt community character and function. By failing to provide the complete dataset, the application falls short of establishing a thorough evidential basis for weighing the potential benefits against the harms.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. The development is required to promote positive health outcomes and mitigate harm; however, the evidence at hand reveals existing adverse effects that have not been fully disclosed. Without the complete assessment, the application cannot claim compliance with this crucial policy.

The procedural implications of these omissions are significant. 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 within the application and fails to meet the evidential requirements stipulated by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, coupled with clear evidence of existing adverse impacts, results in an incomplete and unreliable evaluation. This undermines the ability to reach a lawful determination and supports the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and a profound sense of remoteness. The proposed introduction of large-scale turbines near the shoreline poses a significant threat, as this would create a continuous industrial presence that fundamentally alters the unique character of this landscape. Such a transformation would be permanent and irreversible, fundamentally changing the views and experiences of the area.

Concerns arise regarding the assessment of visual impacts, which fails to accurately reflect the scale of the changes anticipated. The turbines' size and proximity would dominate views from residential areas, historic sites, and popular coastal locations, severely impacting visual amenity and eroding the essential qualities of naturalness and remoteness. The assessment does not convey the true significance of these impacts in a sensitive landscape, leading to an inadequate understanding of the transformation that would occur.

Methodological issues are apparent in the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints do not encompass the most sensitive receptors or 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, which undermines the credibility of

the assessment.

Moreover, there is a notable failure to assess the interconnectedness of landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are integrated within a broader landscape that connects visually and spatially to the Atlantic horizon. The assessment treats these sites in isolation, neglecting their interdependence and resulting in an incomplete evaluation of the impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would sever these vital relationships, altering how heritage assets are experienced and disrupting their ties to the natural horizon. This issue extends beyond mere visual impacts, encompassing a wider cultural and spatial harm that has not been sufficiently assessed in the application.

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4 regarding the protection of natural areas and historic assets. The scale of change contradicts the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. Additionally, the lack of a comprehensive worst-case assessment diminishes any claims of policy compliance.

Ultimately, the identified impacts cannot be effectively mitigated. Given the turbines' size, height, and proximity, their presence would be both dominant and unavoidable. The resulting alterations would be fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal presents a significant deficiency in the assessment of construction and pollution risks, leaving critical details lacking for evaluating the likely environmental effects. Substantial seabed preparation and installation works will take place within a high-energy Atlantic environment, yet there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans provided. Instead, the application relies on future mitigation and contingency measures that are to be prepared after consent, which prevents any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures is especially alarming, given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are at risk from sediment disturbance and contamination. Although the application acknowledges risks associated with sediment mobilisation and potential accidental chemical or oil spills, it lacks sufficient detail on how these risks will be prevented, controlled, or monitored.

Moreover, there is uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies in place, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also extends to potential effects on marine species and habitats identified as sensitive in the wider assessment.

The absence of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning until after consent, the application restricts the evaluation of whether suitable safeguards are in place to address pollution events. This introduces procedural risk and undermines the ability of the competent authority to assess environmental protection measures at the determination stage.

From a regulatory standpoint, deferring critical environmental safeguards contravenes the requirements of the Environmental Impact Assessment regime. Likely significant effects and mitigation need to be assessed prior to consent, and when such information is absent, a lawful determination cannot be achieved. Additionally, the application fails to demonstrate compliance with policy requirements related to environmental protection and water quality.

In summary, the lack of defined mitigation measures, detailed management plans, and clarity regarding potential impacts renders the assessment materially deficient. These shortcomings hinder a thorough evaluation of construction and pollution risks and further substantiate 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 proposed development involves significant onshore infrastructure linked to offshore turbines, yet the assessment fails to adequately evaluate the full range of impacts as it treats these components separately. This fragmented approach obscures the true scale of the environmental and socio-economic effects that arise from what constitutes a single integrated project.

Integral to the onshore works are the cabling across protected moorland, the construction of a substation near Stornoway, and the associated access infrastructure that passes through sensitive landscapes. Excavation across areas of deep peat, particularly within Barvas Moor, is planned despite its significance as a carbon store and ecologically sensitive habitat. The application lacks a comprehensive assessment of these impacts, which is essential for understanding the project's overall environmental footprint.

Furthermore, the exclusion or deferral of assessing onshore impacts compromises the evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered in unison; however, the distinct assessment of offshore and onshore elements fails to account for the combined

impacts on peatlands, habitats, and local communities. This separation raises concerns regarding sensitive habitats, including machair systems and peatland environments that are already protected by policy. The application does not adequately demonstrate that the impacts on these habitats have been fully assessed or that appropriate avoidance measures are in place, resulting in a significant evidential gap concerning biodiversity protection.

There are also serious implications for carbon balance. Disturbing peatland releases stored carbon, which could lead to a carbon debt that contradicts the intended benefits of renewable energy development. The application does not sufficiently address this issue nor show that the overall carbon balance remains advantageous.

Additionally, routing infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. The lack of evidence that necessary consents or processes have been initiated raises further questions about the deliverability and lawful implementation of the project.

From a policy standpoint, the inadequate assessment of the project as a whole and the failure to protect peatlands, habitats, and land use interests contradict the National Marine Plan and National Planning Framework 4. This inability to demonstrate that impacts can be avoided or mitigated severely undermines the application.

In summary, the division of project components, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts make this portion of the application incomplete and unreliable, thus hindering lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment lacks a crucial evaluation of dark skies and nocturnal wildlife, representing a significant oversight. The coastline of West Lewis is renowned for its exceptionally dark skies, which contribute substantially to environmental quality, cultural identity, and tourism potential. The proposed development introduces permanent red aviation lighting that would be visible from long distances, creating an intrusive “wall of light” effect across the western horizon, thereby fundamentally changing the night-time environment.

Furthermore, the application fails to consider the lighting's impact on visual amenity, landscape character, or the experiences of both residents and visitors. This is particularly important given the significance of dark skies to the area's identity and the growth of tourism sectors such as astro-tourism. The oversight in assessing these effects leads to a notable deficiency in the comprehensive landscape and environmental evaluation.

Of greater concern is the absence of an analysis regarding the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly susceptible to artificial lighting due to phototaxis, which can

cause disorientation and elevate collision risks. The application does not provide a lighting impact assessment or conduct a phototaxis study, failing to evaluate how aviation lighting might influence these species or contribute to increased mortality rates.

Additionally, the reliance on daytime survey data in the ornithological assessment does not adequately address nocturnal activity or the associated risks. Other species, including Kittiwakes, which may forage or migrate at night, are similarly at risk of disorientation from artificial lighting; however, this risk has not been investigated. The lack of site-specific night-time data creates a substantial gap in understanding ecological impacts.

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

From a policy perspective, the omission is at odds with the National Planning Framework 4 regarding the safeguarding of natural places and environmental quality. It also detracts from the overall evaluation of landscape and seascape impacts, as the night-time character is a vital aspect of the environment.

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

TOURISM

The evaluation of tourism impacts within the application is insufficient and neglects to address the economic and social ramifications for a crucial sector of the Isle of Lewis economy. The tourism industry relies heavily on the region's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. While it is stated that 86% of visitors are attracted by the scenery, there is no quantified analysis regarding how the proposed large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contributions from tourism.

Tourism on the island has experienced notable growth, increasing from £65 million in 2017 to over £81.5 million, which supports over 1,000 jobs and represents approximately 16% of the island's economy. Nevertheless, the application does not explore how the industrialisation of the seascape and the resulting decline in environmental quality would affect the Tourism Gross Value Added or the broader economic resilience. Without this critical analysis, it remains unclear whether the development would provide a net economic benefit or adversely affect an established and thriving sector.

The assessment further neglects to examine the significance of environmental quality in enhancing tourism, particularly the value of unspoiled landscapes and dark skies to the visitor experience, along with emerging markets such as nature-based tourism and astro-tourism. The failure to include a Dark Skies Assessment exacerbates this shortcoming, creating a significant gap in understanding the effects on a recognised and growing segment of the local economy.

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

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly concerning economic impacts and the necessity to show net benefits. It conflicts with strategic objectives that designate tourism as a priority growth sector and fails to provide adequate evidence for the competent authority to evaluate the economic ramifications of the proposal.

In summary, the combined shortcomings of failing to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and recognise the economic dependency of the island culminate in a significant evidential gap. This impedes a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm demonstrates a significant failure to meet the requirements of sustainable development as outlined by statutory duties, national policy, and evidential standards. It revisits the same central issues that led to the rejection of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the scale of industrialisation. This new proposal is now presented within a policy framework that places greater emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing, yet still falls short.

A complete and reliable evidential basis for determination is not provided. There are notable gaps in baseline data, reliance on an undefined design envelope, unspecified mitigation measures, and the exclusion of crucial impact pathways such as nocturnal wildlife, full onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, hindering a full understanding of the likely significant effects or residual impacts.

Moreover, clear procedural failures are evident. The lack of a compliant Island Communities Impact Assessment violates statutory obligations under the Islands (Scotland) Act 2018, and the failure to disclose the entire Social Impact Assessment constitutes a serious omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic

resilience, making the application unsuitable for determination.

The proposal directly contradicts National Planning Framework 4. It does not demonstrate protection for biodiversity, natural places, and cultural heritage, fails to establish that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit due to inadequate tourism impact modelling. The cumulative impacts of offshore and onshore elements have not been thoroughly evaluated, obscuring effects 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 contain internal inconsistencies. The necessary evidential threshold to eliminate adverse effects beyond reasonable scientific doubt has not been satisfied, thus engaging the precautionary principle and impeding a lawful conclusion that impacts are acceptable.

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

In summary, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, alongside policy conflicts and unresolved environmental risks, obstruct a lawful and evidence-based decision. The competent authority must either reject the application on these grounds or 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 application for the Spiorad na Mara Offshore Wind Farm.

Additional Comments

As a visitor to the stunning Lsle of Lewis and Harris, I am deeply concerned about the potential wind farm development planned for just offshore from the West Coast of Isle of Lewis.
The ecological effect on the seabed, sea life and potential on going affect to the thousands of seabirds in the area is beyond comprehension.
The current view feels endless and having seen the visual destruction the offshore windfarms have had on the Norfolk coast, I can't believe this windfarm is being considered in such an area. It will affect tourism and devastate a stunning area.
Please consider alternatives.

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: CB9A9745

Member of the public 1362

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 review of the Environmental Impact Assessment Report and associated documents has revealed serious deficiencies in planning, environmental, cultural, and procedural aspects of the proposal. The development is planned off the west side of the Isle of Lewis, an area cherished for its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. The scale and design of this proposal raise urgent concerns about its alignment with statutory requirements, national policy, and the tenets of sustainable development.

The application lacks a solid evidential basis necessary for a lawful determination. There is a troubling absence of critical environmental data, with baseline information being limited and inconsistent. Moreover, several key components of the proposal remain undefined. The reliance on a flexible design framework obscures a clear understanding of the potential significant effects, and the unspecified nature of mitigation measures renders their effectiveness impossible to evaluate. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects lack robust supporting evidence.

Substantial policy conflicts are evident in this proposal, which appears to be at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This inconsistency particularly pertains to issues of biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not satisfactorily demonstrate its ability to meet national requirements for protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly impact the statutory tests needed for consent and undermine the capacity of the competent authority to determine the proposal's acceptability within policy frameworks.

The unprecedented scale of the proposal, with large turbines positioned alarmingly close to the shoreline, raises significant concerns regarding landscape capacity, visual dominance, and environmental impact. Collectively, the insufficient information, dependence on undefined mitigation strategies, evidential gaps, and evident policy non-compliance highlight that this application is incomplete and unfit to support a lawful determination. Under these circumstances, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a complete, clear, or dependable account of the likely environmental impacts associated with the proposal. The incorporation of a flexible Project Design Envelope, which lacks specific turbine dimensions, layouts, or configurations, creates substantial uncertainty and hinders the consistent application of a worst-case scenario analysis. This compromises the assessment's integrity, resulting in impacts that may not accurately represent the development that will ultimately be constructed. Consequently, both the public and the competent authority are left without a true understanding of the environmental implications.

The application places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. As a result, consent is sought with the expectation that environmental harm will be mitigated later, obstructing any meaningful evaluation of effectiveness or assessment of residual impacts. This postponement of critical information until after consent is granted is procedurally unacceptable and contradicts the aims of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation measures be thoroughly established before determination.

There are notable evidential inadequacies, including a lack of baseline data, methodological limitations, and a dependence on assumptions rather than site-specific evidence. This leads to uncertainty regarding the magnitude and significance of impacts, particularly where negligible or non-significant effects are concluded without substantial supporting data. The deficiency of adequate information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot be aligned with statutory obligations.

As a result, the application does not meet the evidential standard set by the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. The proposal also fails to demonstrate adherence to National Planning Framework 4, particularly the requirements related to biodiversity protection and environmental integrity, as it does not provide evidence that impacts have been fully assessed or that suitable safeguards are implemented.

In summary, the reliance on an undefined design envelope, the lack of specified mitigation, and the gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These issues hinder a lawful and rigorous assessment of environmental effects, meaning that the competent authority is not positioned to make a determination based on the information supplied.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives within the application is significantly lacking and fails to fulfil the statutory obligations required under the Environmental Impact Assessment regime. Instead of offering a systematic and reasoned evaluation of viable alternatives based on their environmental repercussions, the application merely outlines a narrative

of the project's development. This method does not adequately illustrate that less damaging alternatives have been appropriately identified, analysed, and chosen over more harmful options.

Furthermore, there is a notable absence of transparent, evidence-based comparisons regarding different offshore sites, scales of development, or design configurations. Specifically, the application does not show that the developer has earnestly evaluated the possibility of situating turbines further offshore, where visual, ecological, and coastal impacts would likely be diminished. Given the sensitivity of the West Lewis coastline, along with the crucial role that proximity to the shore plays in assessing impact, the lack of this analysis obstructs any assertion that the proposed location constitutes the least damaging choice.

This inadequacy also extends to the examination of cable routing and landfall assessments, where there is insufficient evidence indicating that alternative routes have been thoroughly considered to avoid or lessen impacts on sensitive receptors. This includes locations of cultural and spiritual significance, such as Barvas Cemetery. The failure to provide a clear strategy for avoidance and the absence of comparative analysis suggest that mitigation through design has not been adequately employed, relying instead on mitigation measures applied after design.

Consequently, the application does not convincingly demonstrate that environmental harm has been minimised through the processes of site selection, layout, and routing of infrastructure. This indicates a failure to adhere to the established mitigation hierarchy and hinders the competent authority's ability to ascertain whether less harmful and more suitable alternatives are available. In the absence of a comprehensive assessment of alternatives, one cannot conclude that the proposal represents a sustainable or policy-compliant solution.

From a policy standpoint, this deficiency undermines adherence to National Planning Framework 4, particularly concerning the safeguarding of natural environments, cultural heritage, and community well-being. 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 sustain a lawful determination.

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.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development lacks reliability due to significant internal inconsistencies and methodological weaknesses, leading to insufficient evidence. It fails to meet the necessary evidential standards required to ascertain no adverse effect on the integrity of protected sites. The application contains contradictory conclusions, raising questions about the reliability of its findings. Importantly, the presence of data gaps and limitations in the modelling approaches employed means that the standard of beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle.

The assessment inadequately evaluates the implications of potential displacement, collision risks, and habitat loss for seabird populations, particularly 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. Additionally, it 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 feeding grounds is not fully recognised, and the reliance on modelling introduces uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars, where mortality rates are likely underestimated due to incomplete baseline data and unexamined behavioural responses.

Furthermore, the location of turbines within a recognised migratory corridor raises significant concerns, as it effectively creates a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor have not been adequately assessed, nor have the potential impacts on species with relatively small global populations been thoroughly explored.

From a regulatory standpoint, the proposal fails 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 application in direct conflict with national policy.

In conclusion, the combination of methodological deficiencies, insufficient evidence, and internal inconsistencies renders the ornithological assessment unreliable. These issues prevent a thorough evaluation of the potential impacts, ultimately indicating that the application does not satisfy the statutory requirements necessary for proper determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity fails to adequately acknowledge the West Lewis coastline as a dynamic cultural landscape where the environment, language, tradition, and community are deeply interwoven. The application approaches heritage in a reductive manner, treating it as a collection of isolated, static assets instead of recognising their ongoing social, cultural, and spiritual significance within the community.

Particularly concerning is the treatment of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas. These sites are active places of burial and spiritual practice, yet they are categorised as static features in the assessment. This oversight fails to recognise their continued use and meaning, as well as the development's potential impact on their setting. Such mischaracterisation leads to an incomplete evaluation of cultural effects and neglects their vital role in community life.

Moreover, the application neglects intangible cultural heritage, such as the Gaelic language, local traditions, and the long-standing bond between the community and the coastal environment. These aspects are integral to the identity of the area and are conspicuously missing from the assessment, representing a substantial omission.

Without accounting for these factors, it is impossible to fully grasp the cultural impact of the proposed development.

Additional concerns arise regarding community rights and engagement. The Gaelic-speaking population embodies a unique cultural identity, which aligns with recognised 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 disregards established principles of participation in decisions that affect cultural and environmental interests.

A significant procedural shortcoming is the lack of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The absence of this assessment impedes the competent authority's ability to fulfil its legal duty to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders a lawful determination impossible.

From a policy standpoint, these deficiencies put the proposal at odds with National Planning Framework 4, especially 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, constitutes a clear violation of policy requirements.

In summary, the failure to assess living heritage, intangible cultural value, community rights, and statutory obligations results in a substantial evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application does not present a sufficient basis for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

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

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

true human and social cost of the development.

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual, seascape, and landscape impacts is significantly lacking and does not adequately account for the extent of change or the sensitivity of the environment. The West Lewis coastline features an open Atlantic horizon, an undeveloped character, and a profound sense of remoteness. The introduction of large-scale turbines near the shoreline would create a continuous industrial presence that fundamentally alters this character, leading to a permanent and irreversible transformation of the landscape.

The application fails to accurately depict the magnitude of visual change. The size and proximity of the turbines would dominate the views from residential areas, historic sites, and popular coastal locations. This would directly affect visual amenity and undermine the defining qualities of naturalness and remoteness. The assessment does not convey the significance of this impact within the context of such a sensitive landscape.

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

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

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

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

Moreover, it is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. As a result, the change is fundamental and permanent, rather than reducible to an acceptable level through mitigation.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal entails substantial seabed preparation and installation works within a high-energy Atlantic environment. However, the assessment of construction and pollution risks is incomplete, lacking the detail necessary to evaluate potential environmental effects. The application does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans, instead relying on mitigation and contingency measures that will be prepared post-consent. This approach obstructs any meaningful assessment of their adequacy or effectiveness.

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

There is significant uncertainty regarding the scale and behaviour of sediment plumes

resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also extends to potential effects on marine species and habitats that have been previously identified as sensitive within the wider assessment.

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

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

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

FISHERIES AND MARINE LIFE

The application presents a number of deficiencies regarding the assessment of fisheries and marine life, resulting in an incomplete and unreliable evaluation of ecological and socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the application does not sufficiently demonstrate that these vital uses and habitats can be protected or maintained without causing significant disruption.

A notable flaw lies in the assumption that fishing activity can be displaced without consequences. The application fails to provide any evidence indicating that alternative fishing grounds are available, accessible, or able to support the added pressure that displacement would create. This oversight is critical, as it raises concerns about potential overfishing in other areas and the possible economic ramifications for the local fishing fleet. Consequently, the impacts on fisheries and livelihoods remain inadequately understood.

The proposal also poses substantial risks to marine species due to underwater noise generated during construction activities. High-energy hammer piling, expected to occur over extended periods, is likely to cause disturbance across vast distances, particularly affecting species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises serious concerns, yet the application minimises the importance of these effects without adequate supporting evidence.

Moreover, there exists a contradiction within the application, where the requirement for licences to allow harm to European Protected Species is acknowledged, while simultaneously claiming that the impacts are negligible. This inconsistency undermines the credibility of the assessment and raises significant questions regarding compliance with the Habitats Regulations, especially when harm is expected to a degree that necessitates legal authorisation.

The assessment further neglects to consider cumulative impacts resulting from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, it becomes impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not establish compliance with the National Planning Framework 4 or the National Marine Plan. It lacks the necessary demonstration that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thereby obstructing any conclusion regarding the proposal's alignment with sustainable development.

In summary, the deficiencies in evidence concerning fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies severely compromise the assessment. These shortcomings prevent a robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

Key onshore elements include the installation of cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, an important carbon store and ecologically sensitive habitat. The application does not offer a thorough assessment of these impacts, thereby hindering a complete understanding of the project’s overall environmental footprint.

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

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

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment concerning dark skies and nocturnal wildlife in the Environmental Impact Assessment represents a significant omission. The proposal to introduce permanent red aviation lighting has the potential to create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment of the West Lewis coastline, an area noted for its exceptionally dark skies, which contribute to its environmental quality, cultural identity, and tourism value.

Moreover, the application neglects to evaluate the impacts of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This oversight is particularly concerning given the growing importance of dark skies to local identity and emerging tourism sectors, such as astro-tourism. The failure to adequately consider these factors creates a significant gap in the overall landscape and environmental assessment.

Of even greater concern is the lack of evaluation regarding the impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel exhibit sensitivity to artificial lighting due to phototaxis, which can cause

disorientation and increase the risk of collisions. The application does not present any lighting impact assessment or phototaxis study, leading to an inability to assess how aviation lighting may impact these species or contribute to increased mortality rates.

Additionally, the ornithological assessment's reliance on daytime survey data fails to address nocturnal activity or associated risks. Other species, such as Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting. The lack of site-specific night-time data represents a critical gap in understanding ecological impacts.

Without a thorough assessment of nocturnal impacts, it remains impossible to ascertain whether protected species or designated sites would face adverse effects. The evidential standard necessary to exclude adverse impacts beyond reasonable scientific doubt cannot be satisfied, thereby engaging the precautionary principle and hindering a lawful determination.

From a policy standpoint, these omissions are in conflict with National Planning Framework 4, particularly concerning the protection of natural places and environmental quality. This oversight further undermines the comprehensive assessment of landscape and seascape impacts, as the character of night-time environments is an integral element of the overall ecological framework.

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

TOURISM

The assessment of tourism impacts is lacking and does not address the economic and social effects on a crucial part of the Isle of Lewis economy. The area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness are essential to tourism. While the application notes that 86% of visitors are attracted by scenery, it fails to provide a quantified assessment of how large-scale offshore infrastructure would influence visitor numbers, behaviour, or the overall economic contribution.

Tourism has seen substantial growth, rising from £65 million in 2017 to over £81.5 million, and supports more than 1,000 jobs, constituting up to 16% of the island’s economy. Nevertheless, the application does not evaluate how the industrialisation of the seascape and loss of environmental quality would affect Tourism Gross Value Added or the broader economic resilience of the island. Without this analysis, it is unclear whether the development would provide a net economic benefit or harm an established and growing sector.

Moreover, the assessment neglects the importance of environmental quality in promoting tourism. Unspoiled landscapes and dark skies are vital for visitor experiences and emerging markets like nature-based tourism and astro-tourism. The

lack of a Dark Skies Assessment exacerbates this issue, creating a significant gap in understanding the impacts on a growing segment of the local economy.

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

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

In summary, the inability to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and recognise the island's economic dependence results in a significant 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 demonstrates a critical failure to meet the standards of sustainable development when evaluated against statutory requirements, national policy, and necessary evidence. This application mirrors the fundamental issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was identified. Now, it is being presented under a policy framework that places increased emphasis on biodiversity, peatland preservation, landscape integrity, and the wellbeing of the community.

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

Furthermore, procedural shortcomings are evident. The absence of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty as outlined in the Islands (Scotland) Act 2018, while the failure to present a complete Social Impact Assessment signifies a material omission. Such inadequacies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal also stands in opposition to National Planning Framework 4, lacking demonstration of biodiversity protection, safeguarding of natural areas, and preservation of cultural heritage. It fails to show that the health and wellbeing impacts are acceptable and cannot prove a net economic benefit due to the lack of tourism impact modelling. The cumulative impacts of both offshore and onshore components have not been thoroughly evaluated, obscuring consequences for peatlands, carbon balance, habitats, and crofting land.

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

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

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

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 61B79890

Member of the public 1363

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 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 proposed application lacks a robust assessment of alternatives, failing to meet the necessary statutory requirements of the Environmental Impact Assessment regime. Instead of providing a structured and reasoned comparison of realistic alternatives based on their environmental effects, the application offers a narrative that recounts the project's evolution. This approach does not adequately demonstrate that less

harmful options have been properly identified, assessed, and chosen over more damaging solutions.

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment contains significant gaps and inconsistencies that undermine its findings. It is crucial to note that the development is situated within key foraging areas and migratory pathways for seabirds. However, the application does not provide adequate evidence to show that these internationally important seabird populations, many of which are in decline, will not be adversely affected. There is a lack of robust evaluation regarding the potential risks of displacement, collision, and habitat loss.

Moreover, a fundamental contradiction arises within the application, which states there will be no significant adverse effects while simultaneously putting forward a Habitats Regulations derogation case. This derogation is only necessary when significant harm is

anticipated. Such inconsistency raises doubts about the reliability of the assessment, suggesting that its conclusions are not well-supported by the available evidence.

The assessment fails to adequately demonstrate that seabird species linked to protected sites like the Lewis Peatlands and St Kilda will remain unaffected. The importance of these feeding areas is not fully acknowledged, and the reliance on modelling techniques introduces further uncertainty, particularly concerning species like Kittiwakes and Fulmars, which are already in severe decline. The methodologies used are likely to underestimate mortality rates, particularly given the incomplete baseline data and the lack of understanding of behavioural responses.

Additionally, the placement of turbines within a recognised migratory corridor poses a significant risk. This situation creates a barrier along a primary flight path for species migrating between the United Kingdom and Iceland. The assessment does not thoroughly consider the long-term effects of sustained mortality in this corridor or the implications for species with relatively small global populations.

From a regulatory standpoint, the application does not meet the necessary evidential standard to conclude no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and limitations in modelling, means that the requisite standard of beyond reasonable scientific doubt has not been reached. This situation engages the precautionary principle and hinders a lawful conclusion in favour of consent.

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

In summary, the assessment is unreliable due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. These issues prevent a thorough evaluation of impacts and ultimately contribute to the conclusion that the application does not satisfy the statutory requirements needed for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

There is a significant shortcoming in how culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas, are treated. These sites are active burial and spiritual locations, yet the assessment dismisses them as static features, overlooking their continued significance and the potential effects of development on

their surroundings. This misrepresentation leads to an incomplete appraisal of cultural impacts and fails to account for their importance in community life.

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

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the Social Impact Assessment is a critical concern that significantly undermines the evaluation of social impacts, health, and wellbeing associated with the proposal. The developer commissioned this assessment, which included focus groups with local residents, yet the full report remains unpublished. This represents a significant evidential gap that inhibits both public understanding and the competent authority's ability to grasp the full extent of the identified social risks based on the developer’s own research.

Residents are reportedly experiencing measurable stress, anxiety, and concern stemming from the scale and proximity of the proposal. These impacts arise from direct

engagement and are based on tangible experiences, not speculation. However, the failure to disclose the complete assessment hampers proper scrutiny of the findings, limiting the capacity to ascertain their significance within the decision-making process.

Furthermore, there is evidence that the proposal is viewed as a direct threat to community identity and cohesion, with the developer's own findings highlighting "cultural loss." Despite this identification, the impacts have not been adequately integrated into the main application nor given appropriate weight. The withholding of the complete Social Impact Assessment obscures the real human and social costs of the development.

This lack of transparency further undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning may be influenced. By failing to provide the full dataset, the application does not offer a complete evidential basis for weighing benefits against potential harm.

From a policy standpoint, the application fails to demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Development must facilitate positive health outcomes and mitigate harm, yet existing evidence suggests adverse effects that have not been fully disclosed. Without the complete assessment, demonstrating compliance with this policy is impossible.

The procedural implications of this situation are substantial. The competent authority cannot conduct a thorough socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This gap constitutes a material omission within the application and fails to meet the evidential requirements set forth by the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of seascape, landscape, and visual effects reveals significant deficiencies that do not properly reflect the scale of change or the sensitivity of the surrounding environment. The character of the West Lewis coastline is marked by its open Atlantic horizon and undeveloped nature, which contributes to a strong sense of remoteness. The proposed large-scale turbines, positioned near the shoreline, would introduce a continuous industrial presence that fundamentally alters this character, resulting in a permanent and irreversible transformation of the landscape.

The application underestimates the magnitude of the visual change expected. Given their scale and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and

undermining the qualities of naturalness and remoteness that define the area. The assessment fails to adequately communicate this level of impact and its significance within such a sensitive landscape.

Concerns also arise regarding the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not capture the most sensitive receptors or worst-case scenarios, especially in relation to crucial cultural heritage sites and high-value landscapes. This oversight poses a risk of underestimating the visual impact, thereby compromising the assessment's reliability.

Moreover, the application neglects to assess the interconnected relationship between the landscape, seascape, and cultural heritage. Significant sites, including the Calanais Standing Stones and other Scheduled Monuments, exist within a broader landscape context linked through visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as isolated, failing to acknowledge their interdependence, which leads to an incomplete evaluation of the impacts on their settings and cultural significance.

The anticipated industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and severing their connection to the natural horizon. This creates not just a visual impact but also broader cultural and spatial harm that the application does not adequately address.

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4, particularly regarding the protection of natural places and historic assets. The scale of the proposed changes is at odds with the necessity to safeguard landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case assessment further diminishes any assertion of policy compliance.

It is evident that the impacts identified cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. Consequently, the resulting changes are fundamental and permanent, rather than something that could be rendered acceptable through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The current application presents serious deficiencies in its assessment of construction and pollution risks, failing to provide the necessary detail for a comprehensive evaluation of environmental effects. Significant seabed preparation and installation work is proposed in a high-energy Atlantic environment, yet it lacks fully developed Construction Environmental Management Plans and Pollution Prevention Plans.

Instead, the application depends on mitigation and contingency measures that are to be formulated post-consent, thus hindering any meaningful assessment of their potential adequacy or effectiveness.

The reliance on unspecified future measures is particularly alarming in light of the delicate receiving environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are sensitive to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it fails to offer sufficient details on how these risks will be prevented, controlled, or monitored.

Moreover, there remains 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 in place, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also encompasses potential effects on marine species and habitats that have already been recognised as sensitive within the broader assessment.

Additionally, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application obstructs the evaluation of whether suitable safeguards are established to address pollution events. This introduces procedural risks and diminishes the capacity of the competent authority to assess environmental protection measures before making a determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. It is mandatory that likely significant effects and mitigation strategies are assessed prior to consent; without this information, a lawful determination cannot be made. The application also does not demonstrate adherence to 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 issues impede a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal presents significant deficiencies in the assessment of fisheries and marine life, failing to offer a thorough evaluation of the ecological and socio-economic impacts on the waters off the West Lewis coast. This area supports a vibrant marine ecosystem and an active fishing industry, yet the application does not adequately demonstrate how these vital uses and habitats will be protected or maintained without facing substantial disruption.

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

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

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal includes significant onshore infrastructure elements that are crucial to the overall project, yet the assessment of these components is materially incomplete. The offshore turbines are inherently linked to the onshore works, including cabling across protected moorland, the construction of a substation near Stornoway, and the associated access infrastructure through sensitive landscapes. This separation in assessment results in a fragmented approach that fails to reveal the true scale of environmental and socio-economic impacts.

A comprehensive evaluation of the potential impacts is lacking, particularly concerning excavation across deep peat areas, especially within Barvas Moor, which serves as a vital carbon store and ecologically sensitive habitat. The application does not provide the necessary detailed assessment of these impacts, limiting the understanding of the project's overall environmental footprint.

By deferring the assessment of onshore impacts, the application prevents an accurate evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project be considered collectively, and the division between offshore and onshore elements obscures the combined effects on peatlands, habitats, and local communities.

Moreover, the proposal poses significant risks to sensitive habitats, including machair systems and peatland environments, which are protected by policy. The application fails to demonstrate that impacts on these important habitats have been thoroughly assessed or that adequate avoidance measures have been put in place, revealing a notable gap in the evidence regarding biodiversity protection.

Concerns surrounding carbon balance also arise from the disturbance of peatland, which can lead to the release of stored carbon, thereby creating a carbon debt that contradicts the aims of renewable energy development. The application does not sufficiently address this concern or confirm that the overall carbon balance remains advantageous.

Additionally, the routing of infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. There is a lack of evidence in the application to indicate that the necessary consents or processes have been initiated, which raises significant questions about the deliverability and lawful implementation of the project.

From a policy standpoint, the failure to assess the project as an integrated 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 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 application incomplete and unreliable, ultimately hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment concerning dark skies and nocturnal wildlife within the Environmental Impact Assessment represents a critical oversight. The West Lewis coastline is known for its exceptionally dark skies, which are integral to the area’s environmental quality, cultural identity, and tourism value. The proposed introduction

of permanent red aviation lighting, visible across long distances, would create a continuous and intrusive effect on the western horizon, fundamentally altering the night-time landscape.

Furthermore, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. Given the significance of dark skies to the region's identity and the burgeoning sector of astro-tourism, this omission is particularly concerning. The lack of consideration for these impacts highlights a substantial gap in the overall landscape and environmental assessment.

Equally alarming is the failure to assess impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are notably sensitive to artificial lighting due to their phototactic behaviour, which may lead to disorientation and an increased risk of collision. The application does not include any evaluation of lighting impacts or a study on phototaxis, resulting in a lack of understanding regarding how aviation lighting could affect these species or contribute to increased mortality rates.

This oversight is exacerbated by the use of daytime survey data in the ornithological assessment, which neglects to capture nocturnal activities and associated risks. Other species, like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been adequately assessed. The absence of site-specific night-time data creates a significant void in understanding ecological impacts.

Without a thorough assessment of nocturnal effects, it remains impossible to ascertain whether protected species or designated sites may face adverse impacts. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt cannot be met, thus engaging the precautionary principle and obstructing a lawful determination.

From a policy perspective, these omissions contradict National Planning Framework 4 regarding the protection of natural places and environmental quality. Moreover, they undermine the comprehensive evaluation of landscape and seascape impacts, as the character of the night-time environment is an essential component of the overall ecosystem.

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

TOURISM

The economic impact of tourism on the Isle of Lewis is critically significant, having grown from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs

and representing up to 16% of the island's economy. However, the assessment conducted by the application is profoundly deficient, failing to adequately evaluate how large-scale offshore infrastructure may affect visitor numbers, behaviour, or overall economic contributions. It is acknowledged that 86% of visitors are attracted by the area's stunning scenery, yet there is no quantified analysis to demonstrate how the industrialisation of the seascape and a decline in environmental quality could influence tourism's Gross Value Added or the broader economic resilience of the island.

The importance of unspoiled landscapes and dark skies to the visitor experience and emerging tourism markets, such as nature-based and astro-tourism, is overlooked. The lack of a Dark Skies Assessment exacerbates this issue, creating a significant gap in understanding the potential impacts on a vital and expanding segment of the local economy. Furthermore, in a community with limited economic diversification, neglecting to assess the effects on tourism raises serious concerns regarding employment, local businesses, and community sustainability.

The application does not include a compliant Island Communities Impact Assessment, resulting in an unaddressed evaluation of these economic vulnerabilities, as stipulated under the Islands (Scotland) Act 2018. Policy-wise, the failure to demonstrate compliance with the National Planning Framework 4 is evident, particularly concerning economic impact and the necessity to illustrate a net benefit. It conflicts with strategic objectives that prioritise tourism as a growth sector and fails to provide adequate evidence for competent authorities to assess the economic ramifications of the proposal.

In sum, the lack of a comprehensive evaluation of tourism impacts, the failure to consider environmental factors influencing visitor behaviour, and the disregard for the island's economic dependency culminate in a significant evidential gap. This undermines any robust evaluation of the economic effects and leads to the conclusion that the application is fundamentally incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the requirements of sustainable development according to statutory duties, national policy, and evidential standards. The application reiterates the main issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. It is now submitted under a more rigorous policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant gaps in the evidential basis for determining the application. It lacks complete baseline data, utilises an undefined design envelope, depends on unspecified mitigation measures, and overlooks important impact pathways such as nocturnal wildlife, full onshore infrastructure, and the effects on tourism. Consequently, the Environmental Impact Assessment is inadequate, failing to provide a thorough understanding of potential significant effects or residual impacts.

Moreover, procedural shortcomings are evident. The lack of a compliant Island Communities Impact Assessment breaches statutory duty under the Islands (Scotland) Act 2018, while the omission of the full Social Impact Assessment represents a significant gap. These failures 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 contradicts National Planning Framework 4, as it does not adequately demonstrate protection of biodiversity, natural areas, and cultural heritage. It fails to show that health and wellbeing impacts are acceptable and cannot provide evidence of a net economic benefit due to the lack of tourism impact modelling. Furthermore, the cumulative effects of both offshore and onshore components have not been properly assessed, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

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

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

In summary, the application is both procedurally and substantively unfit for determination. The considerable deficiencies in information, alongside policy conflicts and unresolved environmental risks, impede a lawful and evidence-based decision. The competent authority should refuse consent based on these grounds or invoke relevant regulatory provisions to mandate 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 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: 19A66EE7