Member of the public 1364

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 is submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a comprehensive review of the Environmental Impact Assessment Report and the associated documentation, revealing material 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 characterised by its Atlantic-facing coastline, nearly pristine environment, and significant cultural identity. Concerns regarding its compliance with statutory requirements, national policy, and the principles of sustainable development arise from the proposal's scale, proximity, and design.

The application lacks an adequate evidential foundation necessary for a lawful determination. There is a notable absence of critical environmental data, while baseline information is both limited and inconsistent. Additionally, key elements of the proposal are not clearly defined. The flexible design framework employed obscures a clear understanding of the likely significant effects, and the reliance on unspecified mitigation measures prevents an assessment of their effectiveness. Consequently, the provided documentation fails to offer a comprehensive or informed view of the environmental, cultural, or community impacts, leading to unsupported claims of negligible or non-significant effects.

The proposal presents clear and substantial conflicts with existing policy. It appears misaligned 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. Furthermore, the application does not demonstrate that it can meet national obligations regarding biodiversity protection, climate interests, and environmental integrity. These inconsistencies directly affect the statutory tests required for consent, compromising the competent authority's ability to conclude that the development is acceptable according to policy.

In this location, the scale of the proposal is unprecedented, with large turbines positioned near the shoreline, which raises significant concerns about landscape capacity, visual dominance, and environmental impacts. Collectively, the lack of sufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and evident policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary comprehensiveness and transparency to accurately convey the potential environmental effects of the proposed development. The reliance on a flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations of turbines, creates substantial uncertainty. This uncertainty undermines the integrity of the assessment, as the impacts outlined may not correspond to the actual development constructed. Consequently, both the public and the competent authority are left without a clear understanding of the true extent of environmental effects.

Furthermore, the application is heavily dependent on mitigation measures, monitoring strategies, and management plans that are currently undefined. Seeking consent based on the promise of addressing environmental harm at a later stage hampers the ability to assess the effectiveness of these measures or evaluate residual impacts. This deferral of crucial information to post-consent stages is not only procedurally unacceptable but also contradicts the fundamental objectives of the Environmental Impact Assessment process, which mandates that significant effects and mitigations be clearly defined prior to determination.

There are substantial evidential shortcomings present, including gaps in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding both the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are made without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainties that cannot be reconciled with statutory requirements.

As a result, the application does not meet the evidential threshold necessary under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Moreover, 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 suitable safeguards exist.

In summary, the combination of an undefined design envelope, the absence of specific mitigation measures, and gaps in baseline data fundamentally undermines the reliability and completeness of the Environmental Impact Assessment Report. These deficiencies obstruct a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make an informed decision based on the provided information.

ASSESSMENT OF ALTERNATIVES

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

A significant oversight in this application pertains to otters, which are designated as a European Protected Species. There has been inadequate recognition and assessment of their active foraging and movement within the coastal areas. The failure to consider

their core foraging range and behavioural patterns means that the potential impacts of construction disturbance, noise, and increased activity have not been sufficiently examined. This shortcoming undermines any conclusions drawn regarding the absence of significant effects on this species.

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, lacking critical evidence and featuring internal inconsistencies that undermine its findings. The west coast of the Isle of Lewis is home to internationally significant seabird populations, many of which are already in decline. However, the application does not adequately demonstrate that these species will remain unaffected by the development. Key foraging areas and migratory pathways are within the project's location, yet the implications of displacement, collision risk, and habitat loss have not been thoroughly evaluated.

There exists a major contradiction within the application: while the developer asserts that there will be no significant adverse effects, they simultaneously pursue a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This contradiction raises serious questions regarding the reliability of the

assessment and suggests that its conclusions lack sufficient evidential support. The assessment fails to provide convincing evidence that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will not be affected. The significance of the feeding grounds has not been fully acknowledged, and reliance on modelling methods introduces uncertainty, particularly for species like Kittiwakes and Fulmars that are in severe decline. Methodologies used may underestimate mortality rates, especially where baseline data is incomplete and behavioural responses remain poorly understood.

Placing turbines within a recognised migratory corridor adds another substantial risk, creating a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The long-term effects of potential sustained mortality within this corridor have not been adequately assessed, nor have the impacts on species with relatively small global populations been considered.

From a regulatory standpoint, the application does not satisfy the evidential threshold required to confirm no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, alongside data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, which prevents a lawful conclusion in favour of consent.

Furthermore, the deficiencies highlighted illustrate a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to show that internationally important seabird populations will not be adversely impacted places this proposal in direct conflict with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of 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 application demonstrates a significant deficiency in the assessment of social impacts, health, and wellbeing, lacking the necessary transparency for a lawful evaluation. Although the developer commissioned a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This omission creates a considerable evidential gap, obstructing both public understanding and the competent authority's ability to grasp the complete range of social risks highlighted by the developer’s research.

Residents are reportedly experiencing measurable stress, anxiety, and concern due to the proposal's scale and proximity. These adverse effects stem from direct engagement with the community and are not speculative in nature. However, the lack of disclosure regarding the full assessment hinders proper scrutiny of these findings and limits the

capacity to assess their significance in the decision-making process.

Furthermore, there is evidence suggesting that the proposal is viewed as a direct threat to community identity and cohesion, with the developer's own findings acknowledging a "cultural loss." Despite this recognition, these impacts have not been adequately integrated into the main application or given appropriate consideration. The withholding of the complete Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency has serious implications for the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health impacts is crucial for projects of this scale, especially where the character and functioning of the community may be at stake. The failure to present the full dataset means that the application does not provide a complete evidential basis for weighing the benefits against the harms.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Developments are required to support positive health outcomes and mitigate harm; however, the evidence currently available points to existing adverse effects that have not been fully disclosed. Without the complete assessment, it is impossible to demonstrate compliance with this policy.

The procedural ramifications are considerable. The competent authority is unable to carry out a comprehensive socio-economic and health evaluation without access to the entire Social Impact Assessment. This represents a material omission in the application and a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

In conclusion, the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This situation obstructs lawful determination and reinforces the assertion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal presents significant shortcomings in its assessment of the seascape, landscape, and visual impacts, failing to adequately address the scale of change and the sensitivity of the receiving environment. The character of the West Lewis coastline is marked by its open Atlantic horizon and undeveloped nature, contributing to a strong sense of remoteness. The introduction of large-scale turbines situated near the shoreline would establish a continuous industrial presence, thereby fundamentally transforming this character and resulting in a permanent alteration of the landscape.

Moreover, the assessment does not sufficiently depict the magnitude of the visual changes anticipated. The proximity and size of the turbines would dominate the views from residential areas, historic sites, and popular coastal locations, directly impacting

visual amenity and diminishing the defining qualities of naturalness and remoteness. It fails to convey the significance of this impact within the context of a highly sensitive landscape.

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

A critical oversight is the lack of assessment regarding the interconnected relationship between the landscape, seascape, and cultural heritage. Prominent sites, including the Calanais Standing Stones and other Scheduled Monuments, are part of a larger landscape setting intertwined with the Atlantic horizon. The assessment treats these heritage assets as isolated entities, neglecting their interdependence and leading to an incomplete evaluation of the impacts on their settings and cultural significance.

The proposed industrialisation of the seascape would sever these crucial relationships, altering the context in which heritage assets are experienced and disrupting their connection to the natural horizon. This does not merely represent a visual impact but signifies broader cultural and spatial harm that remains inadequately assessed within the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, particularly concerning the safeguarding of natural places and historic assets. The scale of change proposed is inconsistent with the necessity to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case assessment further undermines any assertion of compliance with policy guidelines.

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

Collectively, these deficiencies highlight a failure to accurately convey the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. This lack of reliable evaluation reinforces the conclusion that the proposal is not compatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks adequate detail for assessing construction and pollution risks, rendering the evaluation of likely environmental effects incomplete. It involves significant seabed preparation and installation works in a high-energy Atlantic

environment. However, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included in the application. Instead, it relies on future mitigation and contingency measures that will be prepared post-consent, hindering any meaningful assessment of their adequacy or effectiveness.

Given the sensitivity of the receiving environment, this reliance on undefined future measures is particularly troubling. The West Lewis coastline is home to clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it fails to provide sufficient information on preventative, controlling, or monitoring strategies.

Further complicating matters is the 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 impacts of these disturbances. This uncertainty also pertains to the potential effects on marine species and habitats that have already been identified as sensitive in the wider assessment.

Additionally, the lack of detailed emergency response procedures exacerbates these concerns. By deferring contingency planning until after consent is granted, the application undermines the ability to evaluate whether adequate safeguards are in place to manage pollution events. This introduces procedural risks and obstructs the competent authority's ability to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the postponement of critical environmental safeguards contradicts the requirements established under the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation measures be assessed prior to consent; in the absence of such information, a lawful determination cannot be achieved. Furthermore, the application fails to demonstrate compliance with policy requirements related to environmental protection and water quality.

Ultimately, the combination of undefined mitigation measures, insufficient management plans, and uncertainty regarding potential impacts leads to a materially deficient assessment. These shortcomings prevent a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal raises significant concerns regarding the impacts on both fisheries and marine life. An essential aspect of the application is the inadequate assessment of ecological and socio-economic factors. The waters off the West Lewis coast are home to a rich marine ecosystem and a thriving fishing industry, yet the application does not adequately demonstrate how these vital habitats and activities will be safeguarded from potential disruption.

A critical flaw in the assessment is the assumption that fishing activities can simply be relocated without adverse effects. The application lacks concrete evidence that alternative fishing grounds are viable or can accommodate the additional fishing pressure that might arise from displacing current operations. This gap is concerning, as such displacement could lead to overfishing in other areas, with significant economic repercussions for the local fishing fleet. The absence of a thorough, evidence-based analysis means that the potential impacts on both fisheries and local livelihoods remain unclear.

The proposal also poses considerable risks to marine species, especially due to the underwater noise generated during construction activities. The anticipated use of high-energy hammer piling for an extended duration is expected to create disturbances over large areas, adversely affecting species like dolphins. Notably, the forecasted disturbance to a significant portion of the local bottlenose dolphin population is troubling. However, the application tends to minimise these concerns, lacking the requisite supporting evidence to substantiate its claims.

There exists a troubling inconsistency within the application regarding the treatment of European Protected Species. While it acknowledges the need for licenses to permit harm, it simultaneously classifies the associated impacts as negligible. This contradiction calls into question the validity of the assessment and raises significant concerns about compliance with the Habitats Regulations, particularly when potential harm requires legal authorisation.

Furthermore, the assessment fails to account for the cumulative impacts stemming from multiple factors, such as habitat disturbance, noise pollution, and fishing activity displacement. Without a thorough analysis of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and the socio-economic landscape.

From a policy standpoint, the application falls short of demonstrating adherence to the National Planning Framework 4 or the National Marine Plan. It does not adequately prove that the proposed development can coexist with existing marine users or that it will not lead to unacceptable impacts on marine biodiversity, thereby hindering any conclusion regarding its sustainability.

In summary, the inadequacies in addressing fishing displacement, the minimisation of acoustic impacts, and the internal contradictions within the assessment culminate in a document that is incomplete and unreliable. These shortcomings impede a comprehensive evaluation of the effects on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application for the project is fundamentally flawed due to the incomplete assessment of onshore infrastructure, which neglects to acknowledge the full scope of impacts associated with what constitutes a single integrated project. The offshore

turbines and the onshore works are intrinsically connected, yet they have been evaluated separately. This disjointed approach obscures the true magnitude of environmental and socio-economic consequences.

Key onshore components include the installation of cabling across protected moorland, the construction of a substation close to Stornoway, and the development of access infrastructure through sensitive landscapes. The planned excavation across areas of deep peat, particularly in Barvas Moor, poses risks to a significant carbon store and an ecologically sensitive habitat. As it stands, the application fails to offer a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By deferring or excluding the assessment of onshore impacts, the application obstructs an accurate evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all facets of a project are considered collectively. The current separation of offshore and onshore elements means that the combined effects on peatlands, habitats, and local communities remain inadequately understood.

Furthermore, the project raises serious concerns about sensitive habitats, including machair systems and peatland environments, which are protected under policy. The application does not convincingly demonstrate that impacts on these vital habitats have been thoroughly evaluated or that effective avoidance measures have been implemented. This results in a significant evidential gap concerning biodiversity protection.

Additionally, the routing of infrastructure through active croft land poses potential conflicts with existing land use and legal rights. There is no evidence provided that the requisite consents or processes have been initiated, which raises significant concerns about the project's deliverability and lawful implementation.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal introduces permanent red aviation lighting that will be visible over long distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon. This lighting will fundamentally change the night-time environment along the West Lewis coastline, which is known for its exceptionally dark skies. These

dark skies are a vital aspect of environmental quality, cultural identity, and tourism value in the area.

The application does not evaluate the impact of this lighting on visual amenity, landscape character, or the experience of residents and visitors. This is a significant oversight, especially considering the increasing importance of dark skies to the region's identity and the growth of tourism sectors like astro-tourism. The failure to assess these impacts represents a clear gap in the overall landscape and environmental evaluation.

Furthermore, there is no consideration of how the proposed lighting will affect nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can cause disorientation and raise the risk of collisions. The application lacks any lighting impact assessment or phototaxis study, leaving unaddressed how aviation lighting may influence these species or contribute to increased mortality rates.

This issue is aggravated by the reliance on daytime survey data for the ornithological assessment, which fails to account for nocturnal activities or related risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation due to artificial lighting, but this concern has not been examined. The lack of site-specific night-time data results in a critical deficit in understanding the ecological impacts.

Without a thorough assessment of nocturnal effects, it is impossible to ascertain whether protected species or designated sites would suffer adverse consequences. The necessary evidential standard to exclude adverse effects beyond reasonable scientific doubt cannot be fulfilled, invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, these omissions contradict the National Planning Framework 4 regarding the protection of natural areas and environmental quality. They also weaken the overall evaluation of landscape and seascape impacts, as the night-time character is a crucial element of the environment.

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

TOURISM

The evaluation of the tourism impacts within the application is lacking and does not adequately address the economic and social ramifications for an essential sector of the Isle of Lewis. The area's wild coastline, near-pristine landscapes, dark skies, and remoteness are fundamental to tourism, which has seen a notable rise, growing from £65 million in 2017 to over £81.5 million. This growth has facilitated the creation of more than 1,000 jobs, constituting up to 16% of the island's economy. Despite these figures, there is no analysis presented on how large-scale offshore infrastructure could

influence visitor numbers, behaviours, or overall economic contributions.

The application also neglects to consider the significance of environmental quality, which is vital for tourism, particularly regarding unspoiled landscapes and dark skies that enhance visitor experiences and attract emerging markets such as nature-based and astro-tourism. The lack of a Dark Skies Assessment further highlights this shortcoming, resulting in a considerable gap in understanding the impacts on a growing segment of the local economy.

In an island community where economic diversification is limited, the failure to assess tourism impacts carries broader implications for employment, local businesses, and the sustainability of the community. The omission of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been thoroughly 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 show a net benefit. It conflicts with strategic objectives that prioritise tourism as a growth sector and fails to provide adequate evidence for the competent authority to assess the economic implications of the proposal.

In summary, the absence of a thorough quantification of tourism impacts, a disregard for the environmental drivers influencing visitor behaviour, and a lack of consideration for the island's economic dependency lead to a significant evidential gap. This gap hinders a thorough evaluation of economic effects and supports the assertion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm demonstrates a significant failure to meet the standards of sustainable development as outlined in statutory duties and national policy. It echoes the core issues that led to the refusal of the Lewis Wind Power proposal in 2008, which highlighted the unacceptable scale of industrialisation. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the current application lacks a thorough evidential basis.

There are substantial gaps in the baseline data, the design envelope remains undefined, and the application leans heavily on unspecified mitigation measures. Moreover, it neglects critical impact pathways, particularly regarding nocturnal wildlife, the full extent of onshore infrastructure, and potential tourism effects. This results in an incomplete Environmental Impact Assessment, hindering any comprehensive understanding of significant effects or residual impacts.

Procedural inadequacies are also evident. The lack of a compliant Island Communities Impact Assessment represents a breach of the Islands (Scotland) Act 2018, while the failure to provide a complete Social Impact Assessment constitutes a serious

omission. Such deficiencies inhibit the competent authority from fully evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Conflicts with National Planning Framework 4 further undermine the proposal. It fails to protect biodiversity, natural places, and cultural heritage, does not adequately address health and wellbeing impacts, and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been assessed thoroughly, clouding the implications for peatlands, carbon balance, habitats, and crofting land.

Environmental risks posed by the project remain uncertain and potentially significant. Evaluations regarding marine ecology, seabirds, protected species, and marine mammals are both incomplete and inconsistent. The necessary evidential threshold to dismiss adverse effects beyond reasonable scientific doubt has not been satisfied, thereby invoking the precautionary principle and precluding a lawful determination that the impacts are acceptable.

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

In summary, the application is both procedurally and substantively unfit for determination. The combination of significant information deficiencies, policy conflicts, and unresolved environmental risks precludes a lawful and evidence-based decision. The competent authority must therefore refuse consent based on these grounds or exercise the relevant regulatory provisions to mandate the submission of the necessary information.

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

Additional Comments

I cannot believe that we've gotten to this stage. This whole planned windfarm is an ecological catastrophe. We have such a unique environment here, this will destroy it in ways that we cannot comprehend. The impact it would have on the whole of the island, people, animals, sea life, plants everything will be affected. It's an environmental disaster waiting to happen.

Tourism is huge here, practically every islander depends on it in some way or other. This will destroy the reasons why people from all around the world come here for. Our fantastic wildlife, scenery, archeology, dark skies you name it will be ruined.

Not to mention that we don't need any more wind farms, especially on a scale like this. If we have to produce more energy, there are other ways that are more environmentally

sound.

Us local islanders will not see any benefit, in fact this is going to place a huge burden on us. Our infrastructure will not survive the influx of people, traffic, heavy machinery etc. our few roads are not built for this. Our shops and hospital are not sufficient. Look at the current state of CalMac

I just cannot fathom how bad this would be if it comes to pass. This would rip out the heart of the island, the home I love

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: E5124FF2

Member of the public 1365

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

Dear Sir/Madam

This letter represents a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection is founded on a comprehensive review of the Environmental Impact Assessment Report and associated documentation, revealing significant deficiencies in planning, environmental, cultural, and procedural aspects. The development's location off the west side of the Isle of Lewis is notable for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity, all of which heighten concerns about the proposal's compatibility with statutory requirements and national policy.

Critical environmental data is conspicuously absent from the application, with limited and inconsistent baseline information. Key elements of the proposal remain undefined, which, combined with the use of a flexible design framework, creates ambiguity regarding the likely significant effects of the project. The reliance on unspecified mitigation measures further complicates the assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, and community impacts, undermining the claims of negligible or non-significant effects, which lack robust evidence.

Moreover, the proposal presents clear and substantive policy conflicts. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not adequately demonstrate compliance with national requirements for protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests necessary for consent, diminishing the ability of the competent authority to determine the proposal's acceptability from a policy standpoint.

The unprecedented scale of the proposal raises further concerns, as it involves large turbines situated in close proximity to the shoreline, which could result in significant landscape capacity issues, visual dominance, and environmental consequences. The combination of insufficient information, the reliance on undefined mitigation measures, and evident policy non-compliance illustrates that the application is incomplete and unsuitable for a lawful determination. Under these circumstances, it is imperative that the precautionary principle be applied.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of the visual impacts, seascape, and landscape is insufficient and does not properly account for the significant changes or the sensitivity of the environment. The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and profound sense of remoteness. The proposed large-scale turbines situated near the shoreline would introduce a pervasive industrial presence, drastically changing this character and leading to an irreversible transformation of the landscape.

The application fails to accurately depict the extent of this visual alteration. Due to the scale and proximity of the turbines, they would dominate sightlines from residential areas, historic landmarks, and popular coastal spots. This would have a direct effect on visual amenity and diminish the essential qualities of naturalness and remoteness. The evaluation does not adequately express the significance of this impact within the context of such a delicate landscape.

Moreover, there are concerns regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that the viewpoints chosen may not fully represent the most sensitive receptors or the most adverse scenarios, especially concerning important cultural heritage sites and landscapes of high value. This raises the possibility that the severity of visual impact has been understated, which compromises the reliability of the assessment.

An additional shortcoming is the neglect to evaluate the interconnected relationship between the landscape, seascape, and cultural heritage. Key sites like the Calanais Standing Stones and other Scheduled Monuments form part of a broader landscape context, linked through visual and spatial connections to the Atlantic horizon. The assessment treats these as separate entities rather than acknowledging their interrelation, leading to a partial understanding of the impacts on their cultural significance and setting.

The industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are experienced and severing their link to the natural horizon. This not only constitutes a visual impact but also a broader cultural and spatial detriment that has not been thoroughly assessed in the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4 regarding the protection of natural areas and historical assets. The magnitude of change is incompatible with the obligation to preserve landscape character, visual amenity, and the settings of culturally significant locations. The lack of a comprehensive worst-case assessment further undermines any assertion of policy compliance.

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

In summary, the assessment does not accurately portray the extent of impact, the environment's sensitivity, or the interconnectedness of landscape and heritage. These shortcomings hinder a dependable evaluation and reinforce the conclusion that the proposal is incompatible with the preservation of this 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 evaluation of tourism impacts within the application is significantly lacking, with a failure to assess the economic and social ramifications for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. While the application indicates that 86% of visitors are attracted by the scenery, it does not provide any quantified assessment regarding how the introduction of large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution of this sector.

Tourism has seen substantial growth, rising from £65 million in 2017 to over £81.5 million currently, supporting more than 1,000 jobs and representing up to 16% of the island's economy. However, the application does not analyse how the industrialisation of the seascape and the degradation of environmental quality could affect Tourism Gross Value Added or the broader economic resilience of the island. The lack of such an assessment means it is impossible to ascertain whether the proposed development would yield a net economic benefit or threaten an established and expanding sector.

Moreover, the assessment neglects the crucial role that environmental quality plays in attracting tourists, particularly regarding the preservation of unspoiled landscapes and dark skies that enhance visitor experiences. This oversight is further exacerbated by the omission of a Dark Skies Assessment, resulting in a significant gap in understanding the implications for a recognised and burgeoning segment of the local economy, such as nature-based tourism and astro-tourism.

In the context of an island community characterised by limited economic diversification, the lack of a thorough assessment of tourism impacts bears broader consequences for employment, local businesses, and the sustainability of communities. The absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been evaluated as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application fails to demonstrate adherence to National Planning Framework 4, particularly concerning economic impacts and the need to show a net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector, lacking sufficient evidence for the competent authority to evaluate the economic consequences of the proposal adequately.

Overall, the combined failure to quantify tourism impacts, assess the environmental drivers that influence visitor behaviour, and recognise the economic dependencies of

the island culminates in a significant evidential gap. This deficiency hinders a thorough evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development as evaluated against statutory duties, national policy, and evidential standards. This application mirrors the primary issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was identified. Despite being presented within a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application remains deficient.

A complete and reliable evidential basis for determination is lacking within the application. Significant gaps exist in the baseline data, along with an undefined design envelope, reliance on unspecified mitigation measures, and the exclusion of critical impact pathways such as nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, hampering a full understanding of likely significant effects or residual impacts.

Procedural failures are evident, particularly the absence of a compliant Island Communities Impact Assessment, which violates the statutory duty under the Islands (Scotland) Act 2018. Additionally, the failure to disclose the full Social Impact Assessment constitutes a significant omission. These shortcomings hinder the competent authority from adequately assessing impacts on community wellbeing, cultural identity, and economic resilience, thus rendering the application unfit for determination.

The proposal is at odds with the National Planning Framework 4, as it does not demonstrate the protection of biodiversity, natural places, and cultural heritage. It fails to prove that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, particularly due to the absence of tourism impact modelling. The cumulative impacts of offshore and onshore elements have not been assessed appropriately, leading to obscured effects on peatlands, carbon balance, habitats, and crofting land.

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

The proposal would bring about substantial and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, loss of dark

skies, disruption of cultural and visual relationships, and impacts on tourism present permanent effects that cannot be mitigated to an acceptable standard.

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

In light of these issues, a formal request is made for the 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: 8118AEB3

Member of the public 1366

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

Dear Sir/Madam

This letter presents a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. A thorough examination of the Environmental Impact Assessment Report and the accompanying documentation reveals significant deficiencies across multiple areas, including planning, environmental factors, cultural considerations, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. Concerns arise regarding the compatibility of the scale, proximity, and design of the proposal with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential foundation necessary for a lawful determination. There is a notable absence of critical environmental data, the baseline information presented is limited and inconsistent, and essential components of the proposal remain unspecified. The flexible design framework employed hampers a clear understanding of the potential significant effects, while the dependence on unspecified mitigation measures renders any assessment of their effectiveness impossible. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, thereby undermining claims of negligible or non-significant effects due to the lack of robust evidence.

Substantive conflicts with existing policy frameworks are evident. The proposal appears to be at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at safeguarding biodiversity, addressing climate interests, and maintaining environmental integrity. Such conflicts directly impact the statutory tests necessary for consent and weaken the competent authority's ability to determine the development's policy acceptability.

The proposal's scale is unprecedented for this location, featuring large turbines placed in close proximity to the shoreline, which raises significant issues regarding landscape capacity, visual dominance, and overall environmental impact. Collectively, the deficiencies in information, reliance on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and inadequate to support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally inadequate, failing to deliver a thorough, transparent, or reliable evaluation of the likely environmental consequences of the proposal. A significant issue lies in the use of a flexible Project Design Envelope, which lacks commitment to precise turbine dimensions, layouts, or configurations. This ambiguity introduces considerable uncertainty and hampers a consistent assessment based on worst-case scenarios. As a result, the integrity of the assessment is compromised, preventing both the public and the competent authority from grasping the true extent of environmental effects associated with the development that may ultimately be constructed.

Furthermore, the application places undue reliance on mitigation measures, monitoring strategies, and management plans that have yet to be established. This approach seeks consent on the premise that environmental harm will be addressed at a later stage, obstructing any meaningful evaluation of effectiveness or the assessment of residual impacts. Such deferral of critical information to post-consent phases is procedurally unacceptable and contradicts the core objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation measures be clearly defined prior to determination.

Additionally, there are critical evidential deficiencies, such as gaps in baseline data, methodological limitations, and a reliance on assumptions instead of site-specific evidence. This leads to uncertainty regarding the magnitude and significance of impacts, particularly when conclusions of negligible or non-significant effects are made without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory obligations.

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

Collectively, the dependence on an undefined design envelope, the absence of specified mitigation strategies, and the gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings prevent a lawful and rigorous evaluation of environmental effects, leaving the competent authority unable to make an informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives within this application is fundamentally inadequate and does not satisfy the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a systematic, evidence-based comparison of feasible alternatives with respect to their environmental impacts, the application presents a

narrative on project evolution that lacks substance. This method fails to show that less harmful options have been properly identified and evaluated in preference to more damaging solutions.

There is a distinct lack of transparency regarding the examination of alternative offshore locations, development scales, and design configurations. Notably, the application does not indicate that the developer has genuinely contemplated positioning turbines further offshore, where visual, ecological, and coastal impacts would likely be lessened. Given the sensitivity of the West Lewis coastline, as well as the critical role that proximity to shore plays in determining impact, the absence of such an analysis means it cannot be concluded that the proposed siting represents the least damaging option.

The inadequacies also extend to the cable routing and landfall assessment, where there is insufficient evidence that alternative routes have been thoroughly investigated to avoid or mitigate impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis demonstrates that mitigation by design has not been properly employed, leading to reliance on post-design mitigation measures.

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

From a policy standpoint, this deficiency jeopardises compliance with 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 leads to the overarching conclusion that the application has not undergone adequate assessment and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species is significantly lacking, failing to offer a complete and trustworthy understanding of the ecological receptors in the West Lewis coastal area. This marine system is both highly sensitive and biologically active, yet the data gathered is inadequate, and the methods employed do not sufficiently capture the presence, behaviour, and habitat usage of various species. Consequently, the assessment does not establish a reliable evidential foundation for assessing potential impacts.

A notable shortcoming pertains to otters, which are classified as a European Protected Species. The application neglects to properly identify and evaluate their active use of coastal regions for foraging and movement. This oversight in considering their core

foraging range and behavioural patterns leads to an insufficient assessment of how construction disturbances, noise, and heightened activity may affect them. Such omissions undermine any assertions regarding the lack of significant effects on this species.

Additionally, the evaluation of basking sharks is deficient, as the reliance on aerial surveys leads to a considerable detection bias, especially under Atlantic conditions. This method is likely to underestimate their presence when compared to established observations made from land that demonstrate frequent usage of these waters. The failure to integrate or adequately acknowledge this data results in an incomplete baseline and diminishes the validity of the conclusions reached.

These methodological flaws mean that assertions of negligible or non-significant effects are based on assumptions rather than solid evidence. The lack of comprehensive baseline data hampers the meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This introduces uncertainty about the actual risks faced by marine species and habitats.

From a regulatory standpoint, the application does not satisfy the criteria set forth by the Environmental Impact Assessment regime and National Planning Framework 4. Protected species have not been appropriately identified or assessed. The uncertainty introduced precludes the exclusion of adverse effects beyond reasonable scientific doubt, thus activating the precautionary principle. Therefore, under these circumstances, granting consent would not be lawful.

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

ORNITHOLOGY AND SEABIRD IMPACTS

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

There exists a stark contradiction in the application, where the developer claims there will be no significant adverse effects while also making a case for Habitats Regulations derogation, which is only applicable when significant harm is anticipated. This inconsistency raises serious questions about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the evidence presented.

Furthermore, the assessment lacks sufficient evidence regarding the impact on seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, and fails to fully account for the importance of these feeding grounds. The reliance on modelling approaches further introduces uncertainty, particularly concerning vulnerable species like Kittiwakes and Fulmars, as the methodologies used are likely to underestimate mortality risks due to incomplete baseline data and limited understanding of behavioural responses.

The decision to site turbines within a recognised migratory corridor poses an additional significant risk, effectively creating a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The assessment does not adequately consider the long-term implications of potential sustained mortality within this corridor or the consequences for species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory findings, coupled with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This invokes the precautionary principle and inhibits a lawful conclusion supporting consent. Moreover, the identified deficiencies signify a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to show that internationally significant seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the cultural heritage and community identity associated with the West Lewis coastline is fundamentally flawed, failing to recognise it as a vibrant cultural landscape where language, tradition, environment, and community are deeply interconnected. Instead of acknowledging the ongoing social, cultural, and spiritual significance of heritage, the application adopts a simplistic view that treats cultural assets as isolated and static.

Significant shortcomings arise in the evaluation of culturally important sites, including the cemeteries located at Dalmore, Bragar, and Barvas. These areas serve as active burial grounds and sites for spiritual practices, yet they are inaccurately classified as static features. This oversight neglects their current use, meaning, and the implications of development on their surroundings. Such a mischaracterisation leads to a deficient understanding of cultural impacts and disregards the vital role these sites play in community life.

Moreover, the application neglects to address intangible cultural heritage, such as the Gaelic language and traditional practices, as well as the enduring relationship between the coastal environment and the local community. These aspects are integral to the identity of the region yet are conspicuously absent from the assessment, representing a critical gap. The cultural repercussions of the proposed development cannot be fully grasped without acknowledging these vital elements.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, which embodies a distinct cultural identity reminiscent of Indigenous Peoples, has not been afforded the opportunity for Free, Prior and Informed Consent. This lack of meaningful engagement significantly undermines the assessment's credibility and fails to uphold established principles regarding participation in matters that impact cultural and environmental interests.

Additionally, the failure to conduct a compliant Island Communities Impact Assessment, mandated by the Islands (Scotland) Act 2018, constitutes a serious procedural lapse. Without this assessment, the competent authority is unable to fulfil its statutory obligation to assess the social, cultural, and economic effects on the island community. This omission alone precludes a lawful evaluation of the proposal.

From a policy standpoint, these inadequacies place the application at odds with the National Planning Framework 4, particularly concerning the safeguarding of historic sites and assets. The disregard for both tangible and intangible heritage, alongside a failure to acknowledge living cultural practices, clearly diverges from policy expectations.

In summary, the collective failure to evaluate living heritage, intangible cultural values, community rights, and statutory obligations results in a substantial evidential gap. The cultural effects of the proposed development remain inadequately assessed, and the application does not furnish a solid foundation for understanding the true cultural cost associated with this proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer commissioned a Social Impact Assessment that included focus groups with local residents; however, the full report remains unpublished. This lack of transparency creates a significant evidential gap that hinders the public and the competent authority from grasping the full extent of social risks revealed through the developer's own research. Available summaries highlight that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement and are therefore not speculative. Yet, the withholding of the complete assessment restricts proper scrutiny of the findings and limits the ability to evaluate their significance within the decision-making process.

Furthermore, the proposal is viewed as a direct threat to community identity and cohesion, with evidence of "cultural loss" identified in the developer's findings. Despite

this, these impacts have not been adequately incorporated into the main application or given the necessary weight. The failure to disclose the full Social Impact Assessment thus 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 crucial for developments of this scale, especially where community character and functionality are at stake. By not providing the complete dataset, the application does not present a comprehensive evidential basis for weighing the benefits against the harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Development is required to promote positive health outcomes and avoid harm, yet the evidence available suggests existing adverse effects that have not been fully disclosed. Without the complete assessment, compliance with this policy remains unproven.

The procedural implications are noteworthy. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a significant omission within the application and constitutes a failure to meet 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, leads to an incomplete and unreliable assessment. This situation obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The application demonstrates significant deficiencies in its assessment of seascape, landscape, and visual impacts, failing to adequately reflect the sensitivity of the environment and the scale of change. The open Atlantic horizon, undeveloped character, and strong sense of remoteness that define the West Lewis coastline would be fundamentally altered by the introduction of large-scale turbines in close proximity to the shoreline. This would create a continuous and dominant industrial presence, leading to a permanent and irreversible transformation of the landscape.

Moreover, the proposed development does not sufficiently represent the magnitude of the visual change. Given their scale and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and eroding the essential qualities of naturalness and remoteness. The assessment fails to convey the significance of these impacts within the context of such a sensitive landscape.

Methodological concerns further undermine the reliability of the visual assessment. There is evidence suggesting that the selection and presentation of visual viewpoints may not adequately capture the most sensitive receptors or worst-case scenarios,

particularly concerning key cultural heritage sites and high-value landscapes. This risk of understating the magnitude of visual impact raises serious questions about the overall assessment's credibility.

A critical oversight is the lack of consideration for the interconnected relationship between landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a wider landscape setting linked to the Atlantic horizon through visual and spatial relationships. Treating these assets as isolated fails to recognise their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are perceived and severing their connection to the natural horizon. This represents a significant cultural and spatial harm that has not been adequately assessed.

From a policy standpoint, the proposal contradicts National Planning Framework 4 regarding the protection of natural places and historic assets. The scale of change presented is incompatible with the need to safeguard landscape character, visual amenity, and the setting of culturally significant sites. The failure to conduct a thorough worst-case assessment further weakens any claim of compliance with relevant policies.

Finally, the impacts identified in the application cannot be effectively mitigated. Due to the height, scale, and proximity of the turbines, their presence would be dominant and unavoidable, resulting in a fundamental and permanent change that cannot be reduced to an acceptable level through mitigation.

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

CONSTRUCTION AND POLLUTION RISKS

The concerns surrounding the proposal stem from an incomplete assessment of construction and pollution risks, which fails to provide the necessary detail to evaluate potential environmental impacts. The project entails significant seabed preparation and installation activities in a high-energy Atlantic environment, yet lacks fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that are to be established after consent, which prevents any meaningful assessment of their potential adequacy or effectiveness.

This reliance on undefined future measures is especially alarming given the sensitivity of the West Lewis coastline, which is home to clean coastal waters and important habitats vulnerable to sediment disruption and contamination. While the application

acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it does not furnish adequate detail on the prevention, control, or monitoring of these threats.

There is considerable uncertainty regarding the scale and behaviour of sediment plumes resulting from the seabed disturbance and cable installation. Without rigorous modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological repercussions of these impacts. This uncertainty also extends to potential effects on sensitive marine species and habitats identified in the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application obstructs the evaluation of whether appropriate measures are in place to address pollution incidents. This introduces procedural risks and undermines the competent authority's capacity to assess environmental protection measures at the determination stage.

Regulatory requirements highlight that the deferral of essential environmental safeguards contradicts the Environmental Impact Assessment regime. It is crucial that likely significant effects and mitigation strategies be assessed before consent is granted, and the absence of such information renders a lawful determination unattainable. Furthermore, the application does not demonstrate compliance with policy stipulations pertaining to 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 collectively render the assessment materially deficient. These deficiencies hinder a robust evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to both a diverse marine ecosystem and an active fishing industry. However, the application does not sufficiently demonstrate that these vital uses and habitats can be safeguarded or maintained without experiencing significant disruption. A primary concern is the assumption that fishing activity can be displaced without adverse effects. The application fails to provide evidence that alternative fishing grounds are available, accessible, or capable of sustaining additional pressure. This omission is critical, as displacement may lead to overfishing in other areas and could have broader economic repercussions for the local fishing fleet. The impacts on fisheries and local livelihoods cannot be adequately assessed without a clear, evidence-based evaluation.

Moreover, the proposal presents substantial risks to marine species, particularly due to underwater noise generated during construction. The anticipated high-energy hammer piling over a prolonged period is likely to disturb marine life over considerable distances, affecting species such as dolphins. The predicted impact on a significant

portion of the local bottlenose dolphin population raises serious concerns, yet the application diminishes the importance of these effects without sufficient evidence to support such a claim.

Furthermore, the application acknowledges the necessity of licenses to permit harm to European Protected Species, yet simultaneously describes the impacts as negligible. This inconsistency undermines the credibility of the assessment and raises serious questions regarding compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

Additionally, the assessment overlooks the cumulative impacts stemming from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, determining the overall impact on marine ecosystems and socio-economic conditions is unfeasible.

From a policy standpoint, the application fails to demonstrate compliance with National Planning Framework 4 or the National Marine Plan. It does not adequately show that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thus precluding 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 collectively render the assessment incomplete and unreliable. These shortcomings impede a robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

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

The exclusion or postponement of the assessment of onshore impacts restricts a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered in unison; however, the bifurcation of offshore and onshore elements results in an incomplete picture regarding the combined effects on peatlands, habitats, and local communities.

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

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is characterised by exceptionally dark skies, which are crucial for environmental quality, cultural identity, and the tourism sector. However, the Environmental Impact Assessment completely omits the assessment of dark skies and nocturnal wildlife, representing a significant gap. The proposal includes permanent red aviation lighting, which would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

This application does not address the impacts of the proposed lighting on visual amenity, landscape character, or the experiences of residents and visitors. Given the importance of dark skies to the area's identity and the emerging sector of astro-tourism, this lack of assessment is particularly concerning. Furthermore, there is no evaluation of how this lighting may affect nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are known to be highly sensitive to artificial lighting, which can result in disorientation and increased collision risks. The absence of a lighting impact assessment or phototaxis study fails to address these crucial effects.

The reliance on daytime survey data in the ornithological assessment further

complicates the matter, as it does not capture nocturnal activity or its associated risks. Species like Kittiwakes, which might forage or migrate at night, are vulnerable to disorientation from artificial lighting, yet this risk has not been evaluated. The lack of site-specific night-time data creates a critical gap in understanding the ecological impacts of the proposal.

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

From a policy standpoint, this omission contradicts National Planning Framework 4, which pertains to the protection of natural places and environmental quality. It undermines the broader assessment of landscape and seascape impacts since night-time character is an integral part of the environment.

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

TOURISM

The assessment of tourism impacts presents significant deficiencies and does not adequately consider the economic and social ramifications for a vital sector of the Isle of Lewis economy. Given the reliance of tourism on the area's wild coastline, nearly pristine landscapes, dark skies, and sense of remoteness, this oversight is particularly concerning. The application states that 86% of visitors are attracted by scenery, yet it fails to provide a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or overall economic contributions.

Tourism has seen notable 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 proposal does not model the potential effects of industrialising the seascape and diminishing environmental quality on Tourism Gross Value Added or broader economic resilience. Without such an analysis, it is impossible to ascertain whether the development would yield a net economic benefit or jeopardise this established and expanding sector.

Moreover, the assessment neglects the significance of environmental quality for tourism, especially the value of unspoiled landscapes and dark skies to visitor experiences, including growing markets like nature-based tourism and astro-tourism. The failure to include a Dark Skies Assessment exacerbates this gap, leaving a considerable lack of understanding regarding impacts on an acknowledged and burgeoning segment of the local economy.

In the context of a community on an island with limited economic diversification, the lack of assessment regarding tourism impacts carries broader implications for employment, local businesses, and community sustainability. The omission of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been adequately evaluated as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4, particularly concerning economic impact and the requirement to show a net benefit. Furthermore, it conflicts with strategic objectives that recognise tourism as a priority growth sector and fails to supply sufficient evidence for the competent authority to evaluate the economic consequences of the proposal.

Collectively, the shortcomings in quantifying tourism impacts, assessing the environmental factors driving visitor behaviour, and recognising the island's economic dependency culminate in a significant evidential gap. This ultimately hinders a robust assessment of economic effects and reinforces the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm exhibits serious deficiencies that compromise its compliance with sustainable development criteria as mandated by statutory duties, national policy, and evidential standards. Similar issues that led to the rejection of the Lewis Wind Power proposal in 2008 are apparent, as the current application presents a level of industrialisation that remains unacceptable despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant gaps in the evidential basis necessary for a sound determination of the application. The use of an undefined design envelope is problematic, and there is a lack of specified mitigation measures. Furthermore, the application omits critical impact pathways, particularly concerning 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.

Procedural shortcomings are also evident, notably the absence of a compliant Island Communities Impact Assessment, which contravenes statutory requirements set forth in the Islands (Scotland) Act 2018. Additionally, the failure to fully disclose the Social Impact Assessment is a material omission that inhibits the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience, thus rendering the application unsuitable for determination.

The proposal stands in direct opposition to the National Planning Framework 4. It does not adequately demonstrate protection for biodiversity, natural places, or cultural heritage, nor does it establish that health and wellbeing impacts are acceptable. The

absence of tourism impact modelling fails to provide evidence of any net economic benefit. Moreover, there has been insufficient assessment of the cumulative impact from both offshore and onshore elements, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties surround environmental risks, with incomplete assessments of marine ecology, seabirds, protected species, and marine mammals. This lack of thorough investigation, and instances of internal inconsistency, do not meet the evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, thereby hindering the capacity to lawfully conclude that impacts are acceptable.

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

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

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 880F0E25

Member of the public 1367

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 the relevant marine licensing and Environmental Impact Assessment regimes. The review of the Environmental Impact Assessment Report and accompanying documentation reveals significant deficiencies in planning, environmental considerations, cultural aspects, and procedural integrity. This development is situated off the west side of the Isle of Lewis, an area celebrated for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The scale and design of the proposal, alongside its proximity to the shoreline, raise serious questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis for a lawful determination, as critical environmental data is missing and baseline information is both limited and inconsistent. Key components of the proposal remain undefined, while the adoption of a flexible design framework obscures an understanding of likely significant effects. Furthermore, reliance on unspecified mitigation measures prevents an assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, and community impacts, with claims of negligible or non-significant effects lacking robust supporting evidence.

There are evident and substantive conflicts with policy. The proposal 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 requirements to safeguard biodiversity, climate interests, and environmental integrity. These discrepancies directly challenge the statutory tests required for consent and hinder the competent authority's ability to ascertain the development's acceptability in policy terms.

The unprecedented scale of the proposal features large turbines positioned dangerously close to the shoreline, raising significant concerns about landscape capacity, visual dominance, and environmental consequences. The combination of insufficient information, dependence on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicates that the application is fundamentally incomplete and incapable of supporting a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a comprehensive, transparent, and trustworthy evaluation of the potential environmental impacts of the proposal. A flexible Project Design Envelope is employed without commitment to specific dimensions or configurations of turbines, resulting in considerable uncertainty. This lack of specificity hinders the consistent application of a worst-case scenario, thus compromising the integrity of the assessment. Consequently, the impacts outlined may not correspond to the actual development, obscuring the true extent of environmental effects for both the public and the competent authority.

The application predominantly hinges on mitigation measures, monitoring strategies, and management plans that remain undefined. As a result, consent is sought on the premise that any environmental damage will be managed at a later stage. This approach inhibits any meaningful evaluation of the effectiveness of these measures or the assessment of residual impacts. Such deferral of crucial information to post-consent phases is procedurally unacceptable and contradicts the intended purpose of the Environmental Impact Assessment framework, which necessitates that significant effects and mitigation strategies are explicitly established before the determination process.

Moreover, there exist substantial evidential shortcomings, including gaps in baseline data, limitations in methodology, and an over-reliance on assumptions instead of robust site-specific evidence. This leads to uncertainty regarding both the scale and significance of impacts, particularly where conclusions of negligible or non-significant effects are made without sufficient supporting data. The lack of adequate information hampers a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that is incompatible with statutory requirements.

As a result, the application does not satisfy the evidential standard required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it cannot be demonstrated that impacts have been thoroughly assessed or that appropriate safeguards are in place.

Collectively, 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 significant deficiencies impede a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make an informed decision based on the information presented.

MARINE ECOLOGY AND PROTECTED SPECIES

The application exhibits significant deficiencies in the assessment of marine ecology and protected species, failing to provide a complete and reliable understanding of

ecological receptors in the West Lewis coastal environment. This area is recognised as a highly sensitive and biologically active marine system. However, the baseline data is inadequate, and the methodologies employed do not effectively capture the presence, behaviour, and habitat use of key species. Consequently, there is a lack of a sound evidential basis for evaluating potential impacts.

One notable shortcoming pertains to otters, a European Protected Species, as the application does not adequately acknowledge or assess their active use of coastal areas for foraging and movement. The failure to consider their core foraging range and behavioural patterns has led to an insufficient assessment of the potential effects arising from construction disturbance, noise, and increased human activity. This oversight undermines the conclusions regarding the absence of significant effects on this species.

In addition, the assessment of basking sharks is flawed due to an over-reliance on aerial surveys, which introduce significant detection bias, particularly under Atlantic conditions. This methodology is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that indicate their frequent use of these waters. The failure to incorporate or properly consider such data results in an incomplete baseline, undermining the reliability of the conclusions reached.

These methodological limitations mean that the conclusions drawn, stating negligible or non-significant effects, are based on assumptions rather than robust evidence. The lack of sufficient baseline data also hampers a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This introduces uncertainty regarding the actual 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 the National Planning Framework 4, given that protected species have not been adequately identified or assessed. The uncertainty introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby engaging the precautionary principle. Under these circumstances, it is not lawful to grant consent.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application under consideration presents significant deficiencies in its ornithological assessment, which is flawed due to substantial gaps in evidence and internal contradictions that challenge its conclusions. Situated on the west coast of the

Isle of Lewis, an area that supports seabird populations of international importance, the proposal fails to adequately demonstrate that these species, many of which are already in decline, will not experience adverse impacts. The proposed development is located within crucial foraging areas and migratory corridors, yet the assessment does not thoroughly evaluate the risks of displacement, collision, or habitat loss for these birds.

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The application presents a significant deficiency in its assessment of cultural heritage and community identity, treating the West Lewis coastline as a mere collection of static assets rather than recognising it as a vibrant cultural landscape deeply intertwined with

environment, language, tradition, and community. This reductive approach fails to acknowledge the ongoing social, cultural, and spiritual significance of heritage sites within the community.

Particularly concerning is the treatment of culturally significant locations such as the cemeteries at Dalmore, Bragar, and Barvas. These sites function actively as places of burial and spiritual practice, yet the assessment misrepresents them as unchanging features. By failing to consider their continued use and meaning, the evaluation neglects the essential impact of development on their setting, leading to an incomplete understanding of cultural effects and a disregard for their integral role in community life.

The application also neglects the assessment of intangible cultural heritage, which includes the Gaelic language and local traditions, as well as the longstanding relationship between the community and its coastal environment. Such elements are vital to the area's identity and their absence from the assessment represents a serious oversight. Without addressing these factors, the true cultural impact of the proposed development remains obscured.

Concerns extend to community rights and engagement as well. The Gaelic-speaking population, which embodies distinct characteristics of an Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the legitimacy of the assessment, contravening established principles of participation in cultural and environmental decision-making.

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

From a policy standpoint, these shortcomings place the proposal in clear conflict with National Planning Framework 4, especially regarding the preservation of historic assets and places. The disregard for both tangible and intangible heritage, as well as the failure to recognise living cultural practices, signifies a marked deviation from policy expectations.

In summary, the combined failures to assess living heritage, intangible cultural values, community rights, and statutory obligations create a substantial evidential gap. The cultural impacts of the development remain inadequately assessed, and the application falls short in providing a solid foundation for understanding the true cultural cost of 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 application lacks a thorough assessment of seascape, landscape, and visual impacts, failing to reflect the true scale of change or the sensitivity of the environment. The West Lewis coastline is characterised by its unspoiled Atlantic horizon and an

overwhelming sense of remoteness. The proposed large-scale turbines, situated close to the shoreline, would create a persistent and dominating industrial presence, fundamentally transforming this unique character and resulting in permanent and irreversible changes to the landscape.

Furthermore, the visual impact is not represented adequately within the application. The size and proximity of the turbines would overshadow views from residential areas, historic locations, and popular coastal sites, thereby directly affecting visual amenity and undermining the essential qualities of naturalness and remoteness. The assessment does not convey the significance of this impact within the context of such a sensitive landscape.

Concerns also arise regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This introduces the risk that the visual impact has been understated, casting doubt on the assessment's reliability.

Another critical shortcoming is the lack of evaluation regarding the interconnected relationships between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape setting, connected by visual and spatial relationships to the Atlantic horizon. The assessment isolates these heritage assets, ignoring their interdependence and leading to an incomplete understanding of the impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are perceived and severing their bond with the natural horizon. This represents not just a visual impact but a wider cultural and spatial harm that the application fails to adequately assess.

From a policy perspective, the proposal directly contradicts National Planning Framework 4 regarding the safeguarding of natural places and historic assets. The magnitude of change is incompatible with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case assessment further weakens any assertion of compliance with policy requirements.

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

In summary, the assessment does not accurately capture the extent of the impact, the sensitivity of the environment, or the interconnected nature of landscape and heritage. These deficiencies impede a reliable evaluation and underscore the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is inadequate and lacks the necessary detail to evaluate potential environmental effects. The project entails significant seabed preparation and installation activities in a high-energy Atlantic environment. However, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included. The application relies on mitigation and contingency measures that are to be formulated after consent has been granted, which hinders any meaningful assessment of their potential effectiveness.

This dependence on unspecified future measures raises particular concerns due to the sensitivity of the local environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are at risk from sediment disruption and contamination. Although the application recognises risks such as sediment mobilisation and the possibility of chemical or oil spills, it fails to provide adequate details on how these risks will be managed, controlled, or monitored.

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

Furthermore, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application undermines the ability to evaluate whether sufficient safeguards are in place to address pollution incidents. This creates procedural risks and compromises the competent authority's capacity to assess environmental protection measures at the time of decision-making.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements set by the Environmental Impact Assessment regime. Significant effects and necessary mitigation must be evaluated before consent is granted, and if this information is lacking, a lawful determination cannot be achieved. The application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the lack of specified mitigation measures, detailed management plans, and uncertainty regarding possible impacts make the assessment materially deficient. These deficiencies obstruct a thorough evaluation of construction and pollution risks and support the conclusion that the application is incomplete.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The onshore works associated with the project, including cabling across protected moorland and the construction of a substation near Stornoway, introduce significant

risks to sensitive habitats. The proposed access infrastructure runs through landscapes that are ecologically fragile, particularly involving excavation across deep peat areas, notably within Barvas Moor, which serves as a crucial carbon store and sensitive habitat. The application fails to provide a comprehensive assessment of these impacts, which hinders a full understanding of the project's environmental footprint.

The risks extend to the machair systems and peatland environments, which are protected under existing policy. The application does not demonstrate that the impacts on these habitats have been thoroughly evaluated, nor does it show that appropriate avoidance measures have been implemented. This represents a substantial evidential gap concerning biodiversity protection.

Moreover, the assessment of onshore infrastructure is materially incomplete as it considers the offshore turbines and onshore works separately. This fragmented approach obscures the true scale of the environmental and socio-economic effects, preventing a proper evaluation of cumulative impacts. The Environmental Impact Assessment process mandates that all components of a project be assessed together; however, the separation of offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities are not adequately understood.

The disturbance of peatland associated with these works raises serious concerns about carbon balance. The release of stored carbon could lead to a carbon debt that undermines the very objectives of renewable energy development. Yet the application does not sufficiently address this issue or demonstrate that the overall carbon balance remains positive.

Additionally, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is a lack of evidence that the necessary consents or processes have been initiated, which brings into question the deliverability and lawful implementation of the project.

From a policy standpoint, the failure to assess the project holistically and to demonstrate protection for 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. Consequently, the separation of 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 incomplete and unreliable, preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The omission of any assessment regarding dark skies and nocturnal wildlife represents a significant evidential gap within the Environmental Impact Assessment. The exceptionally dark skies along the West Lewis coastline are integral to the area's environmental quality, cultural identity, and tourism value. The proposal includes the introduction of permanent red aviation lighting, which would be visible over considerable distances, thereby creating a continuous and intrusive "wall of light"

across the western horizon that fundamentally alters the night-time environment.

Furthermore, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This oversight is particularly significant in light of the importance of dark skies to the identity of the area and the growth of tourism sectors such as astro-tourism. The failure to consider these impacts reflects a clear deficiency in the overall landscape and environmental assessment.

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

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

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

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

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

TOURISM

The application presents significant deficiencies in its assessment of tourism impacts, neglecting to evaluate both the economic and social consequences for a crucial sector of the Isle of Lewis economy. It is vital to recognise that tourism relies heavily on the region's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness.

Although the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide a quantified assessment of how the proposed large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution from tourism.

Tourism on the Isle of Lewis has experienced substantial growth, with its value increasing from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. Despite this positive trend, the application does not adequately model the potential impact of industrialising the seascape or the loss of environmental quality on Tourism Gross Value Added and overall economic resilience. Without this crucial analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or jeopardise an established and burgeoning sector.

Furthermore, the assessment overlooks the critical role that environmental quality plays in bolstering tourism. It fails to consider the significance of unspoiled landscapes and dark skies for the visitor experience, particularly for emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this inadequacy, leaving a considerable gap in understanding the impact on a recognised and expanding segment of the local economy.

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

From a policy standpoint, the application fails to demonstrate alignment with the National Planning Framework 4, especially concerning economic impact and the necessity to show net benefits. It contradicts strategic objectives that designate tourism as a priority growth sector and does not furnish adequate evidence for the competent authority to evaluate the economic repercussions of the proposal.

In summary, the deficiencies in quantifying tourism impacts, assessing environmental factors that influence visitor behaviour, and considering the island's economic dependency result in a significant evidential gap. This lack of thorough analysis obstructs a comprehensive evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the standards of sustainable development as required by statutory duties, national policy, and evidential standards. This application echoes the core concerns that led to the refusal of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the scale of industrialisation. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection,

landscape integrity, and community wellbeing, the application does not adequately address these critical areas.

A significant concern is the incomplete and unreliable evidential basis for determination. There are notable gaps in baseline data and an undefined design envelope is employed, alongside unspecified reliance on mitigation measures. Key impact pathways, including nocturnal wildlife, onshore infrastructure, and tourism effects, have been omitted from the assessment. Consequently, the Environmental Impact Assessment is insufficient, hindering a comprehensive understanding of the likely significant effects and residual impacts.

Procedural failures are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory duties under the Islands (Scotland) Act 2018, while the failure to disclose a full Social Impact Assessment is a material omission. These gaps impede the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

Moreover, the proposal conflicts directly with National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural places, and cultural heritage. The health and wellbeing impacts have not been shown to be acceptable, and the absence of tourism impact modelling prevents evidence of any net economic benefit. Additionally, the cumulative impacts of both offshore and onshore components have not been properly assessed, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

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

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

Overall, the application is procedurally and substantively unfit for determination. The scale of deficiencies in information, combined with policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority is urged to refuse consent on these grounds or to invoke regulatory provisions requiring the submission of the missing information.

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

Additional Comments

I am strongly opposed to this proposed development. My concerns centre around the negative impact on species and habitats during the development and operational phases of this windfarm.

The environmental impact assessment has been inadequate, and the findings are not transparent enough.

The view will change dramatically and this will negatively impact the community of Lewis as well as tourists visiting.

This development would negatively contribute to the erosion of culture on Lewis.

Any economic boost will benefit only a few local people.

I hope you will listen to voices of people for whom these islands are home.

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: 5EEE61F6

Member of the public 1368

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

Dear Sir/Madam

This letter represents a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted in accordance with marine licensing and Environmental Impact Assessment frameworks. A thorough review of the Environmental Impact Assessment Report and accompanying documentation reveals significant deficiencies related to planning, environmental, cultural, and procedural matters. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and a strong cultural identity. The proposal raises serious concerns about its alignment with statutory requirements, national policy, and the tenets of sustainable development due to its scale, proximity, and design.

The application lacks an adequate evidential basis necessary for a lawful determination. There is a notable absence of critical environmental data, while the baseline information provided is both limited and inconsistent. Key components of the proposal remain unclear, and the flexible design framework employed hinders a proper assessment of likely significant effects. Furthermore, the reliance on unspecified mitigation measures calls into question their effectiveness, rendering the documentation inadequate for a comprehensive understanding of the potential environmental, cultural, or community impacts. Consequently, assertions of negligible or non-significant effects lack robust supporting evidence.

Policy conflicts are evident and substantial. The proposal appears at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These conflicts directly undermine the statutory tests essential for obtaining consent and impair the competent authority's ability to determine whether the development is policy-compliant.

The scale of the proposal is unprecedented for this location, as it includes large turbines positioned very close to the shoreline, which raises serious concerns regarding landscape capacity, visual dominance, and environmental impact. In light of the insufficient information provided, reliance on undefined mitigation measures, evidential shortcomings, and clear policy non-compliance, it is evident that the application is incomplete and cannot support a lawful determination. Under these conditions, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application is fundamentally flawed due to significant evidential deficiencies, including gaps in baseline data and limitations in methodology, which rely on assumptions rather than site-specific evidence. This creates uncertainty around the scale and significance of impacts, especially where conclusions suggest negligible or non-significant effects without adequate supporting data. Such inadequacies hinder a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that does not align with statutory requirements.

Moreover, the Environmental Impact Assessment Report is materially deficient, failing to provide a complete, transparent, or reliable overview of the likely environmental effects associated with the proposal. The implementation of a flexible Project Design Envelope, lacking firm commitments to specific turbine dimensions, layouts, or configurations, further complicates the situation by introducing uncertainty. This lack of clarity undermines the integrity of the assessment and means that the impacts described may not truly reflect the development that will be constructed, thereby preventing both the public and the competent authority from fully grasping the environmental implications.

Consent is sought on the basis that environmental harm will be mitigated at a later stage, which is procedurally unacceptable. This approach conflicts with the objective of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation measures are clearly defined before any determination is made. The absence of defined mitigation measures, monitoring strategies, and management plans further exacerbates the problem, leaving the assessment incomplete and unreliable.

Consequently, the application does not meet the evidential threshold set by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, especially regarding the protection of biodiversity and environmental integrity, as it cannot be established that impacts have been comprehensively assessed or that appropriate safeguards are in place.

In summary, the combination of an undefined design envelope, lack of specified mitigation, and substantial gaps in baseline data leads to an Environmental Impact Assessment Report that is not only incomplete but also unreliable. These deficiencies obstruct a lawful and rigorous evaluation of environmental effects and place the competent authority in a position where it cannot appropriately determine the application based on the information available.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives within the application is significantly flawed and does not fulfil the statutory requirements outlined by the Environmental Impact Assessment regime. Instead of offering a structured and reasoned analysis of realistic alternatives based on their environmental impacts, the application simply narrates the project's development. This method falls short of proving that less harmful options have been

identified, properly assessed, and chosen over more damaging alternatives.

There is a notable lack of transparent and evidence-based comparisons among alternative offshore locations, development scales, or design configurations. Specifically, the application fails to show that the developer has given genuine consideration to positioning the turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be diminished. The West Lewis coastline is particularly sensitive, and the crucial role of proximity to shore in assessing impacts means that without such analysis, it cannot be concluded that the proposed siting is the least damaging option available.

This inadequacy extends to the assessments of cable routing and landfall, where there is a clear deficiency in evidence that alternative routes have been sufficiently explored to avoid or minimise effects on sensitive receptors. This includes areas of cultural and spiritual significance, such as Barvas Cemetery. The lack of a defined avoidance strategy, combined with the absence of comparative analysis, indicates that mitigation by design has not been effectively implemented; instead, there appears to be a reliance on mitigative measures applied after the design phase.

Consequently, the application does not prove that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This represents a failure to adhere to the established mitigation hierarchy, thereby inhibiting the competent authority's ability to ascertain whether less harmful and more suitable alternatives are available. A comprehensive assessment of alternatives is necessary; without it, one cannot conclude that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this shortcoming compromises adherence to National Planning Framework 4, particularly regarding the protection of natural spaces, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant oversight that contributes to the conclusion that the application has not been adequately evaluated and therefore cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed application presents an assessment of marine ecology and protected species that is fundamentally flawed, lacking a complete understanding of the ecological receptors within the West Lewis coastal environment. This area is notably sensitive and biologically active, yet the baseline data is insufficient and the methodologies employed fail to accurately capture the presence, behaviour, and habitat utilisation of various species. Consequently, the assessment does not provide a credible evidential basis for evaluating potential impacts.

A significant gap in this assessment pertains to otters, which are classified as a European Protected Species. The application does not adequately recognise or assess otters' active utilisation of coastal areas for foraging and movement. The failure to

address their core foraging ranges and behavioural patterns means that potential impacts from construction disturbance, noise, and increased activity have not been properly evaluated. This oversight undermines any assertions regarding the lack of significant effects on this species.

Further shortcomings are evident in the assessment of basking sharks, where the reliance on aerial surveys introduces considerable detection bias, particularly under Atlantic conditions. This methodological choice likely results in an underestimation of their presence, especially when compared to established land-based observations that demonstrate frequent use of these waters. The omission or inadequate consideration of such data leads to an incomplete baseline and compromises the reliability of the conclusions reached.

Due to these methodological weaknesses, conclusions indicating negligible or non-significant effects are based on assumptions rather than solid evidence. The lack of adequate baseline data also hampers a meaningful evaluation of cumulative and indirect impacts, including seasonal changes and broader ecosystem interactions. This situation generates uncertainty regarding the actual scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the stipulations of the Environmental Impact Assessment regime or the National Planning Framework 4, as it fails to properly identify or assess protected species. The resulting uncertainty inhibits the ability to exclude adverse effects beyond reasonable scientific doubt, thereby necessitating adherence to the precautionary principle. Under these conditions, consent cannot be legally granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species, culminating in the conclusion that the application does not possess a robust evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development presents substantial flaws, characterised by significant evidence gaps and internal contradictions that challenge its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already experiencing decline. However, the application does not adequately demonstrate that these species will remain unaffected, failing to meet the necessary evidential standard. The placement of turbines within key foraging areas and migratory pathways raises critical concerns, yet the assessment does not sufficiently evaluate the risks associated with displacement, collision, or habitat loss.

A critical inconsistency arises within the application, wherein the developer asserts that there will be no significant adverse effects while simultaneously submitting a

Habitats Regulations derogation case, which is only warranted when significant harm is anticipated. This contradiction undermines the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the available evidence. Furthermore, the assessment lacks adequate proof that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will not face negative impacts. The significance of these vital feeding grounds is not fully recognised, and reliance on modelling techniques introduces uncertainty, particularly concerning species like Kittiwakes and Fulmars, which are in severe decline. The methodologies used are likely to underestimate mortality, especially in instances where baseline data is insufficient and behavioural responses are not comprehensively understood.

The siting of turbines within a recognised migratory corridor adds another layer of risk, effectively obstructing 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 in this corridor or the potential effects on species with relatively small global populations. From a regulatory standpoint, the application does not satisfy the evidential requirements necessary to affirm no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, alongside data gaps and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been reached. This invokes the precautionary principle and precludes a lawful conclusion in support of consent.

The identified deficiencies also represent 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 places the proposal in direct opposition to national policy. Collectively, these factors render the assessment unreliable due to methodological shortcomings, internal inconsistencies, and insufficient evidence. Such inadequacies obstruct a thorough evaluation of impacts and contribute to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

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

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

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing is fundamentally inadequate and lacks the necessary transparency for a lawful evaluation. The developer engaged in a Social Impact Assessment that included focus groups with local residents; however, the complete report has not been made public. This gap in evidence prevents both the public and the competent authority from grasping the full extent of the social risks highlighted by the developer's own research.

Summaries that are available show that residents are experiencing notable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts come from direct engagement and are not based on speculation. The lack of disclosure of the full assessment obstructs proper scrutiny of the findings and diminishes the capacity to assess their significance in the decision-making process.

Moreover, there is evidence suggesting that the proposal is viewed as a threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. Despite this acknowledgment, these impacts have not been adequately incorporated into the primary application or given the necessary consideration. The failure to release the full Social Impact Assessment obscures the true social and human costs associated with the development.

This absence of transparency compromises the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning are at stake. By withholding the complete dataset, the application fails to provide a comprehensive evidential foundation for assessing the balance of benefits and harms.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Developments must foster positive health outcomes and mitigate harm, yet the evidence currently available suggests there are adverse effects that have not been fully revealed. Without access to the complete assessment, compliance with this policy remains unproven.

The procedural ramifications are significant. The competent authority cannot conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This omission is material and represents a failure to meet the evidential standards required by the Environmental Impact Assessment framework.

In summary, the failure to disclose the full Social Impact Assessment, in conjunction with evidence of existing negative impacts, results in an incomplete and unreliable assessment. This hinders a lawful determination and reinforces the conclusion that the application is not backed by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

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

Moreover, the assessment does not consider the interconnectedness of landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting, linked visually and spatially to the Atlantic horizon. By treating these sites as isolated entities, the assessment overlooks their interdependence, resulting in an incomplete evaluation of impacts on their setting and cultural importance.

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The evaluation of construction and pollution risks related to the proposal is notably deficient and lacks the necessary detail to assess potential environmental impacts. There will be significant seabed preparation and installation activities in a demanding Atlantic environment, yet the application does not provide well-defined Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it depends on mitigation and contingency measures that will be formulated after consent is granted, which hampers any thorough evaluation of their potential effectiveness.

This reliance on unspecified future measures raises serious concerns, particularly due to the delicate nature of the surrounding environment. The West Lewis coastline is home to pristine coastal waters and crucial habitats, both of which are susceptible to

sediment disruption and contamination. While the application acknowledges risks, such as sediment mobilisation and accidental spills, it fails to outline adequate strategies for prevention, control, or monitoring of these hazards.

Furthermore, there is ambiguity regarding the scope and dynamics of sediment plumes resulting from seabed disturbances and cable installations. In the absence of comprehensive modelling and clearly articulated management strategies, it is impossible to ascertain the potential extent, duration, or ecological repercussions of these impacts. This uncertainty also extends to the marine species and habitats that have already been identified as sensitive within the broader assessment.

The lack of detailed emergency response procedures only exacerbates these issues. By postponing contingency planning until after consent, the application restricts the ability to assess whether proper safeguards will be in place to manage pollution incidents. This creates procedural risks and compromises the capability of the competent authority to evaluate the environmental protection measures at the point of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards stands in conflict with the stipulations of the Environmental Impact Assessment regime. Prior to granting consent, likely significant effects and required mitigations must be thoroughly assessed, and the absence of this information means that a lawful determination cannot be reached. The application also falls short of demonstrating adherence to policy standards concerning environmental protection and water quality.

Collectively, the lack of specified mitigation strategies, inadequate management plans, and the uncertainty regarding potential impacts culminate in a materially deficient assessment. These deficiencies obstruct a credible appraisal of construction and pollution risks and reinforce the argument that the application is incomplete.

FISHERIES AND MARINE LIFE

The application lacks a thorough assessment of fisheries and marine life, which is crucial given the diverse marine ecosystem and active fishing industry off the West Lewis coast. There is a failure to demonstrate that these important habitats and uses can be preserved without substantial disruption. A key concern arises from the unfounded assumption that fishing activities can be displaced without adverse effects. The application does not provide any evidence that alternative fishing grounds are available, accessible, or capable of supporting increased pressure. This significant omission raises the risk of overfishing in other areas, potentially leading to broader economic repercussions for the local fishing fleet. Without a clear, evidence-based evaluation, the implications for both fisheries and local livelihoods remain poorly understood.

Moreover, the proposal poses considerable risks to marine species, especially due to the underwater noise generated during construction. The high-energy hammer piling anticipated over an extended period is expected to disturb a wide area, impacting

species such as dolphins. The predicted disturbance to a considerable portion of the local bottlenose dolphin population is alarming; however, the application downplays these effects without adequate supporting evidence.

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

Furthermore, the assessment neglects to address cumulative impacts arising from various pressures such as habitat disturbance, noise, and the displacement of fishing activities. The absence of a comprehensive evaluation of these combined effects hinders the ability to determine the overall impact on marine ecosystems and socio-economic conditions.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the project fails to adequately evaluate the onshore infrastructure, resulting in an incomplete understanding of the overall impacts of what is essentially a single integrated project. The separate assessments of the offshore turbines and onshore works lead to a fragmented approach that obscures the actual scale of the environmental and socio-economic consequences.

The onshore components encompass cabling across protected moorland, the construction of a substation near Stornoway, and necessary access infrastructure through sensitive landscapes. These activities involve excavation in deep peat areas, notably within Barvas Moor, which is a crucial carbon store and an ecologically sensitive environment. Without a comprehensive assessment of these impacts, the application falls short of providing a clear picture of the project's environmental footprint.

By failing to assess the onshore impacts fully or deferring such evaluations, the application hinders an accurate assessment of cumulative effects. It is essential for the Environmental Impact Assessment process to consider all components of a project in

conjunction; however, the distinct treatment of offshore and onshore elements leaves the combined impacts on peatlands, habitats, and communities inadequately understood.

There are also considerable risks to sensitive habitats, such as machair systems and peatland environments, which are under policy protection. The lack of demonstrated assessment of impacts on these habitats, along with the absence of appropriate avoidance measures, creates a significant evidential gap concerning biodiversity protection.

The proposal raises serious concerns about carbon balance, as disturbance of peatland can release stored carbon, potentially creating 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.

Moreover, routing infrastructure through active croft land poses potential conflicts with existing land use and legal rights. There is no evidence provided that the necessary consents or processes have been initiated, leading to uncertainties about the deliverability and lawful implementation of the project.

From a policy standpoint, the lack of comprehensive assessment of the project as a whole, along with the failure to demonstrate protection of peatlands, habitats, and land use interests, conflicts with the National Marine Plan and the 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 thorough assessment, and the lack of evidence regarding environmental and land use impacts render this part of the application incomplete and untrustworthy, preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which contribute significantly to environmental quality, cultural identity, and the tourism value of the area. However, the Environmental Impact Assessment fails to include any consideration of dark skies and nocturnal wildlife, representing a critical omission. The proposal introduces permanent red aviation lighting that would be visible over long distances, creating a continuous and intrusive "wall of light" across the western horizon, fundamentally altering the night-time environment.

The application does not evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This lack of assessment is particularly concerning given the importance of dark skies to the region's identity and the growth of tourism sectors such as astro-tourism. The absence of an analysis of these effects creates a significant gap in the overall landscape and environmental assessment.

Moreover, there is no assessment of how this lighting may affect nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to their phototactic behaviours, which can lead to disorientation and increased risks of collision. The application does not include a lighting impact assessment or a phototaxis study, neglecting to examine the potential consequences for these species or the potential increase in mortality rates.

This deficiency is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activities and related risks. Other species, including Kittiwakes, may forage or migrate at night and are similarly vulnerable to disorientation from artificial lighting, yet this risk has not been examined. The lack of site-specific night-time data leaves a critical gap in the understanding of ecological impacts.

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

From a policy standpoint, this omission is contrary to National Planning Framework 4 regarding the protection of natural places and environmental quality. It also undermines the comprehensive assessment of landscape and seascape impacts, as the night-time character is integral to the environment. Overall, the absence of any assessment of dark skies and nocturnal wildlife presents a substantial evidential gap. The deficiency of baseline data, impact modelling, and species-specific analysis renders the application incomplete and incapable of supporting a lawful determination.

TOURISM

The application acknowledges that 86% of visitors are drawn by scenery. However, it does not provide a quantified assessment of how large-scale offshore infrastructure would influence visitor numbers or overall economic contributions. The assessment of tourism impacts is materially deficient, failing to evaluate the economic and social consequences for a key sector of the Isle of Lewis economy. Tourism is fundamentally dependent on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness.

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. Despite this significant increase, the application neglects to model how the industrialisation of the seascape and loss of environmental quality would affect Tourism Gross Value Added or the wider economic resilience of the region. Without such analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or adversely impact this established and growing sector.

Additionally, the assessment overlooks the vital role of environmental quality in supporting tourism. The importance of unspoiled landscapes and dark skies to visitor experience, as well as emerging markets such as nature-based tourism and astro-tourism, are not addressed. The absence of a Dark Skies Assessment further exacerbates this oversight, creating a significant gap in understanding the impacts on a recognised and expanding segment of the local economy.

In a community with limited economic diversification, the failure to assess 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 have not been evaluated as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application fails to demonstrate compliance with National Planning Framework 4, particularly regarding economic impact and the need to show net benefit. It also conflicts with strategic objectives that highlight tourism as a priority growth sector. Furthermore, it does not provide adequate evidence to enable the competent authority to assess the economic consequences of the proposal.

The collective failure to quantify tourism impacts, assess environmental drivers of visitor behaviour, and consider the island's economic dependency results in a considerable evidential gap. This deficiency hinders a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

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

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

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

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

Environmental risks associated with the proposal remain uncertain and potentially severe. The assessments pertaining to marine ecology, seabirds, protected species, and marine mammals are incomplete and contain inconsistencies. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been satisfied, which invokes the precautionary principle and precludes a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is procedurally and substantively unfit for determination. The multitude of information deficiencies, alongside policy conflicts and unresolved environmental risks, obstructs any lawful and evidence-based decision-making. It is essential for the competent authority to either refuse consent on these grounds or to invoke the appropriate regulatory provisions to demand the submission of the necessary missing information.

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

Additional Comments

Destroying habitats for political "eco" gains is absolutely disgusting and nothing but a vanity project in disguise with no actual benefits to the local community. Trying to sweeten it with a Gaelic name is an insult to the heritage and culture of the Western Isles. I strongly object. As islanders, we are fed up of these unwanted projects being foisted on us.

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: 9FD55B3D

Member of the public 1369

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted for consideration under the marine licensing and Environmental Impact Assessment regulations. The objection is grounded in a thorough examination of the Environmental Impact Assessment Report and its supporting documents, highlighting deficiencies related to planning, environmental issues, cultural significance, and procedural integrity. Located off the west coast of the Isle of Lewis, the area is characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The scale, proximity, and design of the wind farm raise serious questions about its alignment with statutory requirements, national policy, and the principles of sustainable development.

A critical analysis reveals that the application lacks a sufficient evidential basis for a lawful determination. There is a notable absence of key environmental data, while the baseline information provided is both limited and inconsistent. Moreover, many aspects of the proposal remain unclear. The flexible design framework employed hinders a comprehensive understanding of potential significant effects, and the reliance on unspecified mitigation measures means their effectiveness remains unassessed. Consequently, the documentation fails to facilitate a complete or informed understanding of the environmental, cultural, or community impacts, and assertions regarding negligible or non-significant effects are not substantiated by robust evidence.

Furthermore, there are significant conflicts with established policies. The proposal seems to contradict the National Marine Plan, the Environmental Impact Assessment regulations, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not convincingly demonstrate adherence to national requirements for the protection of biodiversity, climate interests, and environmental integrity. Such conflicts directly affect the statutory tests necessary for consent and impede the competent authority's ability to determine the acceptability of the development from a policy perspective.

The scale of this proposal is unprecedented in the region, with large turbines planned in close proximity to the shoreline, raising substantial concerns about landscape capacity, visual impact, and broader environmental consequences. The collective effect of insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance suggests that the application is incomplete and unfit to support a lawful determination. Under these circumstances, it is essential that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is insufficient, lacking a complete, transparent, and reliable evaluation of the environmental effects anticipated from the proposal. The employment of a flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations for the turbines, introduces a considerable degree of uncertainty. This uncertainty hampers the consistent application of a worst-case scenario, thereby undermining the integrity of the assessment. Consequently, the impacts detailed may not accurately represent the development that is ultimately realised, which prevents both the public and the competent authority from grasping the true extent of environmental effects.

Moreover, the application places significant reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. This request for consent implies that environmental harm will be managed subsequently, hindering any meaningful evaluation of the effectiveness of such measures and assessment of residual impacts. Deferring crucial information to stages after consent is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly established prior to any determination.

There exist substantial evidential deficiencies, including gaps in baseline data, limitations in methodology, and a reliance on assumptions rather than site-specific evidence. This results in uncertainty surrounding the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are made without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot be reconciled with statutory requirements.

As a result, the application does not meet the evidential threshold required under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate compliance with National Planning Framework 4, including stipulations related to biodiversity protection and environmental integrity, as it cannot be shown that impacts have been fully assessed or that suitable safeguards are established.

Overall, the combination of reliance on an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings inhibit a lawful and robust assessment of environmental effects and mean that the competent authority cannot adjudicate the application based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The coastal environment of West Lewis is a highly sensitive and biologically active marine system, yet the assessment of marine ecology and protected species is materially deficient. It fails to provide a complete or reliable understanding of the ecological receptors within this area. The methodologies applied are insufficient, as

they do not adequately capture species presence, behaviour, and habitat use. Consequently, the assessment does not offer a sound evidential basis for evaluating potential impacts.

A significant oversight pertains to otters, classified as a European Protected Species. The application does not properly acknowledge or assess their active usage of coastal areas for foraging and movement. The neglect of their core foraging range and behavioural patterns results in an inadequate evaluation of the potential effects of construction disturbance, noise, and increased activity. This oversight undermines any conclusions suggesting an absence of significant effects on this species.

Further weaknesses are evident in the assessment of basking sharks. The reliance on aerial surveys introduces considerable detection bias, particularly in Atlantic conditions, likely leading to an underestimation of their presence. This is particularly concerning when compared to established land-based observations that indicate frequent usage of these waters. The failure to incorporate or adequately consider such data results in an incomplete baseline, thereby weakening the reliability of the conclusions drawn.

The methodological limitations outlined mean that conclusions regarding negligible or non-significant effects are based on assumptions rather than robust evidence. Additionally, the lack of sufficient baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variation and broader ecosystem interactions. This creates uncertainty about the true scale of risk posed to marine species and habitats.

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

In summary, the deficiencies related to incomplete baseline data, flawed methodologies, and unsupported conclusions render the assessment unreliable. These issues impede a robust evaluation of the impacts on marine ecology and protected species, ultimately indicating that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposal is fundamentally flawed, revealing significant gaps in evidence and inconsistencies that undermine its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application fails to sufficiently demonstrate that these species will not face adverse effects. The development is situated within key foraging areas and migratory pathways, yet the assessment does not adequately

evaluate the risks of displacement, collision, or habitat loss.

A notable contradiction arises within the application, where the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only warranted when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the evidence.

Furthermore, the assessment does not convincingly establish 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 comprehensively addressed, and the reliance on modelling introduces uncertainties, particularly concerning species that are in severe decline, like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, especially in areas where baseline data is insufficient and behavioural responses remain poorly understood.

The positioning of turbines within a designated migratory corridor presents an additional and considerable risk, 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 implications of sustained mortality within this corridor or its potential impact on species with relatively small global populations.

From a regulatory standpoint, the application does not fulfil the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data gaps and limitations in modelling, indicates that the standard of proof beyond reasonable scientific doubt has not been met. This situation engages the precautionary principle, hindering any lawful conclusion in support of consent.

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

Collectively, these issues render the assessment unreliable due to internal inconsistencies, methodological weaknesses, and insufficient evidence. Such shortcomings obstruct a thorough evaluation of impacts and lead to the conclusion that the application does not meet the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

A significant oversight is evident in 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 they are classified as static features, neglecting their continued use and importance as well as the impact that development may have on their surrounding environment. This mischaracterisation leads to an inadequate assessment of cultural effects and overlooks their vital role in community life.

Moreover, the application does not address intangible cultural heritage, including the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These elements are essential to the area's identity and are conspicuously missing from the assessment, which constitutes a significant omission. Without acknowledging these factors, the cultural implications of the development remain poorly understood.

Further issues arise concerning community rights and engagement. The Gaelic-speaking population has a distinct cultural identity that is recognised as characteristic of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement compromises the validity of the assessment and fails to adhere to established principles of participation in decisions that affect cultural and environmental interests.

Additionally, there is a critical procedural failure due to the absence of a compliant Island Communities Impact Assessment, which is a statutory requirement under the Islands (Scotland) Act 2018. The absence of this assessment means that the competent authority cannot properly fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This single omission prevents a lawful determination.

From a policy standpoint, these shortcomings place the proposal in direct conflict with National Planning Framework 4, particularly regarding the protection of historic assets and places. The disregard for both tangible and intangible heritage, as well as the failure to acknowledge living cultural practices, clearly diverges from policy requirements.

In summary, the lack of assessment concerning living heritage, intangible cultural value, community rights, and statutory responsibilities creates a significant evidential gap. The cultural impacts of the development have not been sufficiently evaluated, and the application does not offer an adequate basis for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer’s Social Impact Assessment has not been fully published, creating a significant evidential gap. This omission restricts both public understanding and the competent authority’s ability to evaluate the potential social risks identified through the developer's own research, which included focus groups with local residents. Consequently, the absence of the complete report significantly undermines the

evaluation process.

Evidence suggests that residents are currently facing measurable stress, anxiety, and concern related to the proposal's scale and proximity. These impacts stem directly from community engagement and are not based on speculation. However, without the full assessment, scrutiny of these findings is hampered, limiting the determination of their significance in the decision-making process.

The proposal is also viewed as a potential threat to community identity and cohesion, with references to “cultural loss” in the developer’s findings. Yet, these serious implications have not been adequately integrated into the application or given the necessary consideration. The failure to disclose the complete Social Impact Assessment obscures the real human and social costs associated with the proposed development.

This lack of transparency has serious consequences for the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health impacts is crucial for projects of this magnitude, particularly when community character and functionality are at stake. The failure to provide the complete dataset compromises the evidential basis for weighing the benefits against the harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. While development should promote positive health outcomes and mitigate harm, the available evidence points to existing adverse effects that remain undisclosed. Without the complete assessment, the application cannot show compliance with this crucial policy requirement.

The procedural implications are substantial. The competent authority lacks the necessary information to perform a comprehensive socio-economic and health evaluation without access to the full Social Impact Assessment. This omission signifies a material failure within the application and does not meet the evidential standards mandated by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing adverse impacts, leads to an incomplete and unreliable assessment. This situation obstructs a lawful determination and further substantiates the argument that the application does not rest on sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts and landscape changes presented in the application is fundamentally inadequate. It does not truly capture the scale of transformation nor the sensitivity of the environment affected. The West Lewis coastline, characterised by its expansive Atlantic horizon and an unspoiled, remote character, would face significant alterations with the introduction of large-scale turbines near the shoreline. This would establish a constant industrial presence, leading to an irreversible and profound change in the landscape.

Moreover, the visual consequences of this proposal have not been accurately portrayed. The turbines, due to their size and closeness to residential areas, historic sites, and popular coastal regions, would dominate views, severely impacting visual amenity and diminishing the area's essential qualities of naturalness and remoteness. The assessment falls short of adequately expressing the significance of this impact in light of the area's sensitivity.

Concerns also arise regarding the methods employed in selecting and displaying visual viewpoints. Evidence indicates that these viewpoints may not represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and valued landscapes. This situation raises the possibility that the visual impact has been downplayed, thereby undermining the overall reliability of the assessment.

Additionally, there is a notable failure to evaluate the intertwined relationship between landscape, seascape, and cultural heritage. Important sites, including the Calanais Standing Stones and other Scheduled Monuments, are intricately linked to the wider landscape through visual and spatial connections to the Atlantic horizon. The assessment incorrectly treats these sites as isolated entities rather than acknowledging their interrelatedness, resulting in an incomplete understanding of how impacts affect their setting and cultural significance.

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

From a policy standpoint, this proposal stands in direct conflict with the National Planning Framework 4, which seeks to protect both natural environments and historic assets. The magnitude of the proposed changes is not compatible with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. Furthermore, the lack of a thorough worst-case assessment diminishes any assertion of compliance with relevant policy.

It is also evident that the identified impacts cannot be adequately mitigated. Given the turbines' scale, height, and proximity, their presence would be overwhelming and inescapable. Consequently, the change introduced by this development is both fundamental and permanent, rather than something that could be lessened to an acceptable degree through mitigation measures.

Overall, the assessment fails to convey the true scale of the impact, the environmental sensitivity, and the interconnectedness of landscape and heritage. These shortcomings obstruct a reliable evaluation and reinforce the conclusion that the proposal is fundamentally incompatible with the necessary protections for this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks the necessary detail to assess construction and pollution risks adequately. There is no comprehensive information on Construction Environmental Management Plans or Pollution Prevention Plans, despite significant seabed preparation and installation occurring in a challenging Atlantic environment. Instead, the application proposes that mitigation and contingency measures will be developed after consent is granted. This approach raises concerns about the effectiveness and sufficiency of these measures.

The West Lewis coastline, known for its clean waters and important habitats, is sensitive to disturbances from sediment and contamination. Although the application acknowledges potential risks like sediment mobilisation and spills, it fails to outline clear strategies for prevention, control, or monitoring of these issues.

There is a notable lack of clarity regarding the scale and behaviour of sediment plumes that may result from the disturbance and cable installation. Without adequate modelling and established management plans, it is impossible to assess the duration, extent, or ecological ramifications of these potential impacts. This uncertainty also extends to sensitive marine species and habitats already identified in the broader assessment.

Additionally, the absence of detailed emergency response procedures exacerbates the issue. By postponing contingency planning until after consent, the application obstructs the evaluation of whether sufficient safeguards are in place to handle pollution incidents. This creates procedural risks and diminishes the capacity of the competent authority to assess environmental protections during the decision-making process.

From a regulatory standpoint, the delay in implementing essential environmental safeguards contradicts the requirements set out by the Environmental Impact Assessment regime. Significant effects and necessary mitigation should be evaluated before consent, and without this information, a lawful determination cannot be reached. The application also does not comply with established policies related to environmental protection and water quality.

In summary, the lack of defined mitigation measures, inadequate management plans, and uncertainty about potential impacts render the assessment deficient. These failures impede a thorough evaluation of construction and pollution risks, further indicating that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment lacks a thorough evaluation of the ecological and socio-economic impacts on fisheries and marine life. The waters off the West Lewis coast are home to a diverse marine ecosystem as well as a thriving fishing industry. However, the application does not adequately demonstrate how these vital uses and habitats will be protected or maintained without significant disruption.

A key concern is the assumption made regarding the displacement of fishing activities without acknowledging the potential consequences. The application fails to provide evidence that alternative fishing grounds are available, accessible, or capable of handling any additional pressure. This absence of information is critical, as displacement could lead to overfishing in other areas and have broader economic repercussions for the local fishing fleet. Without a clear, evidence-based assessment, the impacts on fisheries and the livelihoods they support remain inadequately understood.

Moreover, there are substantial risks posed to marine species, particularly due to the underwater noise generated during construction. High-energy hammer piling over a prolonged period is expected to disturb species over considerable distances, including dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises serious concerns, yet the application minimizes the importance of these effects without adequate supporting evidence.

The application reveals a glaring inconsistency; it acknowledges the necessity of licences for any harm to European Protected Species, while simultaneously characterising the anticipated impacts as negligible. This contradiction severely undermines the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially where harm is expected to a level that necessitates legal authorisation.

Additionally, the assessment overlooks cumulative impacts resulting from multiple pressures such as habitat disturbance, noise, and the displacement of fishing activities. Without a comprehensive analysis of these interconnected 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 National Planning Framework 4 or the National Marine Plan. It fails to establish that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thus preventing any conclusion that the proposal constitutes sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents a proposed project that lacks a complete assessment of onshore infrastructure, failing to account for the full spectrum of impacts related to an integrated system. The offshore turbines and onshore works are interlinked, yet they have been evaluated separately, leading to a fragmented approach that obscures the overall environmental and socio-economic ramifications.

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

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

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

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The application fails to include any evaluation of nocturnal wildlife, which is a serious oversight. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are known to be particularly sensitive to artificial lighting. Their behaviour, affected by phototaxis, can lead to disorientation and increased risk of collision. The

lack of a lighting impact assessment or a phototaxis study means there is no understanding of how the proposed aviation lighting could affect these species or potentially increase their mortality rates.

Additionally, the application does not consider the impact of the proposed permanent red aviation lighting on visual amenity, landscape character, or the overall experience for both residents and visitors. This is particularly concerning given the significance of dark skies to the region's identity and its tourism potential, particularly in relation to astro-tourism. The introduction of lighting visible over long distances would create an intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

The reliance on daytime survey data in the ornithological assessment is problematic, as it overlooks the nocturnal activity of species such as Kittiwakes, which may forage or migrate at night. This lack of site-specific night-time data leads to a crucial gap in understanding the ecological impacts of the proposal.

Moreover, without assessing the impacts on nocturnal wildlife and dark skies, it remains impossible to establish whether protected species or designated sites could be adversely affected. The evidential standard required to demonstrate that adverse effects are unlikely cannot be satisfied. This situation invokes the precautionary principle and hinders a lawful determination of the proposal.

From a policy standpoint, this omission contradicts National Planning Framework 4, which relates to the protection of natural areas and the quality of the environment. It also detracts from the comprehensive evaluation of landscape and seascape impacts, as the character of night-time settings is an essential component of the overall environment.

Overall, the lack of assessment regarding dark skies and nocturnal wildlife creates a substantial evidential gap. The absence of baseline data, impact modelling, and specific species analysis renders the application incomplete and insufficient for a lawful determination.

TOURISM

The analysis of tourism impacts presented in the application is notably inadequate, failing to evaluate the economic and social ramifications for a pivotal sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and the feeling of remoteness. The application itself states that 86% of visitors are attracted by the scenery, yet it lacks a quantifiable assessment of how the proposed large-scale offshore infrastructure might influence visitor numbers, their behaviour, or the overall economic contributions they make.

Tourism has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, while supporting more than 1,000 jobs and representing up to 16% of the island's economy. Nevertheless, there is no modelling within the application regarding

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 such analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or instead harm an established and expanding sector.

The failure to address the significance of environmental quality in sustaining tourism is evident, especially regarding how unspoiled landscapes and dark skies enhance the visitor experience, as well as their importance to emerging markets like nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment further exacerbates this shortcoming, creating a critical void 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 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 thoroughly evaluated, as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, particularly regarding economic impact and the necessity to establish net benefit. It is at odds with strategic objectives that highlight tourism as a priority growth sector and fails to furnish adequate evidence for the competent authority to assess the economic repercussions of the proposal.

Collectively, the inability to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and recognise the island's economic dependency results in a significant evidential gap. This deficiency hinders a comprehensive evaluation of economic effects and leads to the conclusion that the application remains incomplete.

SUMMARY

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

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

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

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

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

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

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

Additional Comments

I can relate to the residents who are presently fighting for the future of their children and subsequent generations to protect the Isle of Lewis from becoming an uninhabitable location due to the threat of Northland's N4 Spiorad na Mara Offshire Wind Farm.

It must be prevented from going ahead for several reasons, not least of which the environmental harm caused to the residents through the infrasound as well as marine life. Not only this, but the damage to tourism which will affect the income of so many.

Regarding infrasound it is worth bringing to the attention of the decision makers, that as you will know, the current regulations apply criteria devised in 1997, long before the giant turbines of today and long before investigation of the impact of infrasound.

As the science develops or, importantly, that damage by infrasound becomes more widely evidenced, the rise to liability on the part of the developer or the landowner will increase. To varying degrees the effects can be felt over several kilometres and impact humans, livestock and wildlife including invertebrates. Proposed mitigations (reduced operating hours, setback distances) lessen but do not eliminate these effects.

This application simply must not be approved, and as a Scottish resident I stand wholeheartedly with the people of the Isle of Lewis, who's history, heritage and environment demands protecting from N4.

Best wishes
Dorothea Heidi Tiplady

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: B556ACDB

Member of the public 1370

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. The objection is based on a review of the Environmental Impact Assessment Report and supporting documentation. It identifies deficiencies related to planning, environmental concerns, cultural factors, and procedural issues. The development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

The scale and design of the proposal introduce significant concerns about its compliance with statutory requirements, national policy, and sustainable development principles. The application lacks a sufficient evidential basis for a lawful determination. There is critical missing environmental data, and the baseline information provided is limited and inconsistent. Key aspects of the proposal remain undefined. The use of a flexible design framework hampers a clear understanding of likely significant effects, while the reliance on unspecified mitigation measures prevents an assessment of their effectiveness. Consequently, the documentation fails to provide a full understanding of the environmental, cultural, or community impacts, and claims of negligible effects lack robust evidence.

Additionally, there are substantial policy conflicts. The proposal 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. It does not demonstrate that it can meet national requirements to protect biodiversity, climate interests, and environmental integrity. These conflicts are critical to the statutory tests for consent and undermine the competent authority's ability to determine the development's acceptability in policy terms.

The unprecedented scale of the proposal, with large turbines positioned close to the shoreline, raises significant concerns about landscape capacity, visual dominance, and environmental impact. Taken together, the insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete. As a result, it is incapable of supporting a lawful determination, and the precautionary principle should apply in this situation.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development fails to adequately assess cultural heritage and community identity, particularly concerning the West Lewis coastline, which is a living cultural landscape where environment, language, tradition, and community are interconnected.

The application treats heritage as isolated and static rather than recognising its ongoing social, cultural, and spiritual significance within the community.

There is a significant deficiency in how culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are treated. These sites serve as active burial and spiritual places, yet they are mischaracterised as static features. This approach neglects their continued use and meaning, which impacts the understanding of development effects on their setting.

Additionally, the assessment overlooks intangible cultural heritage, including the Gaelic language, traditions, and the community's longstanding relationship with the coastal environment. These elements are essential to the area's identity, yet they are completely absent from the evaluation, which is a major omission. Without accounting for these factors, the cultural impacts of the proposed development cannot be fully understood.

There are also important concerns regarding community rights and engagement. The Gaelic-speaking population has a unique cultural identity recognised as part of Indigenous Peoples, but the absence of a Free, Prior and Informed Consent process undermines the validity of the assessment. This lack of meaningful engagement does not align with established principles of participation in decisions that affect cultural and environmental interests.

A critical procedural flaw is the lack of an Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. This assessment is necessary for the competent authority to evaluate the social, cultural, and economic effects on the island community. Its absence alone renders a lawful determination impossible.

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

The overall result is a significant evidential gap due to the failure to assess living heritage, intangible cultural value, community rights, and statutory obligations. The cultural impacts of the development have not been adequately evaluated, and the application lacks sufficient basis for understanding the true cultural cost of the proposal.

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 fundamentally flawed due to incomplete assessments of construction and pollution risks. The lack of fully developed Construction Environmental Management Plans and Pollution Prevention Plans means there is insufficient detail to assess likely environmental effects. Substantial seabed preparation and installation work will occur in a high-energy Atlantic environment, yet mitigation and contingency measures are only intended to be created after consent is granted. This approach prevents any real evaluation of their adequacy or effectiveness.

The West Lewis coastline features clean coastal waters and crucial habitats that can be severely impacted by sediment disturbance and contamination. Although the application acknowledges risks like sediment mobilisation and accidental chemical or oil spills, it does not adequately outline how these risks will be prevented, controlled, or monitored. There is also significant uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clear management strategies, it is impossible to ascertain the potential extent, duration, or ecological consequences of these impacts, particularly on the sensitive marine species and habitats identified in the wider assessment.

Moreover, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application undermines the ability to evaluate whether appropriate safeguards are available to address pollution events. This situation creates procedural risk and limits the competent authority's capacity to assess environmental protection measures prior to determination.

From a regulatory standpoint, the deferral of critical environmental safeguards contradicts the Environmental Impact Assessment regime’s requirements. Significant effects and mitigation strategies must be evaluated before consent is granted. The absence of this information means that a lawful determination cannot be achieved. Furthermore, the application fails to meet policy requirements concerning environmental protection and water quality.

In conclusion, the overall absence of defined mitigation measures, detailed management plans, and clarity regarding potential impacts creates a materially deficient assessment. These shortcomings hinder a thorough evaluation of construction and pollution risks, supporting the assertion that the application is incomplete.

TOURISM

The Isle of Lewis relies heavily on its tourism sector, which has seen significant 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 local economy. The assessment of tourism impacts related to the proposed development is materially deficient, neglecting to evaluate the economic and social consequences for this crucial sector. The application

acknowledges that 86% of visitors are attracted by the area's scenery, yet it fails to provide a quantified assessment of how large-scale offshore infrastructure might affect visitor numbers, behaviour, or overall economic contribution.

Additionally, the analysis does not consider the vital role that environmental quality plays in supporting tourism. Key elements such as unspoiled landscapes and dark skies are essential to the visitor experience and contribute to 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 potential impacts on a recognized and expanding part of the local economy.

In an island community with limited economic diversification, the failure to assess the implications for tourism extends beyond economics, affecting employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been properly 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 concerning economic impact and the necessity to demonstrate net benefit. It also contradicts strategic objectives that highlight tourism as a priority growth sector. Consequently, the lack of sufficient evidence prevents the competent authority from adequately assessing the economic consequences of the proposal.

Overall, the failure to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and consider the island's economic dependency results in a significant evidential gap. This deficiency hampers a thorough evaluation of economic effects and indicates that the application is incomplete.

SUMMARY

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

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

Procedural missteps are also evident. The lack of a compliant Island Communities

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

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

The environmental risks posed by the proposal are not only uncertain but potentially significant. The evaluations of marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The requisite evidential threshold to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, necessitating the application of the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

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

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

Additional Comments

To big and to close to shore with no benefit to island, damage to wildlife. Should be smaller further out and be locally owned.

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: 115EA8B3

Member of the public 1371

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. This raises significant concerns regarding landscape capacity, visual dominance, and environmental impact.

A review of the Environmental Impact Assessment Report and supporting documentation reveals material planning, environmental, cultural, and procedural deficiencies. 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 use of a flexible design framework hinders a clear understanding of likely significant effects. Moreover, reliance on unspecified mitigation measures means their effectiveness cannot be assessed. Consequently, the documentation does not facilitate a full or informed understanding of environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust evidence.

There are clear and substantive policy conflicts present in the proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. Such conflicts directly affect the statutory tests required for consent and undermine the ability of the competent authority to determine that the development aligns with policy requirements.

Overall, the absence of sufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and incapable of supporting a lawful determination. In these circumstances, the precautionary principle must apply.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report demonstrates substantial deficiencies, failing to deliver a comprehensive, transparent, and trustworthy evaluation of the anticipated environmental impacts associated with the proposal. Notably, the absence of specific turbine dimensions, layouts, or configurations due to the reliance on a flexible Project Design Envelope creates considerable uncertainty. This lack of clarity undermines the assessment's integrity, leading to the potential that the impacts

delineated may not accurately mirror the eventual development, thus obstructing both public and competent authority comprehension of the true nature of environmental effects.

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The application fails to meet the statutory requirements of the Environmental Impact Assessment regime due to an inadequately conducted assessment of alternatives. It does not provide a structured and reasoned comparison of realistic alternatives based on their environmental effects, instead offering a narrative of project evolution. This methodology does not demonstrate that less harmful options have been appropriately identified, assessed, and selected over more damaging alternatives.

In particular, there is a lack of transparent and evidence-based comparisons regarding

alternative offshore locations, development scales, and design configurations. The application does not prove that the developer has seriously explored the potential for turbine placement further offshore, which could likely mitigate visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline and the critical nature of proximity to shore in assessing impact underline the significance of this omission; without such analysis, it cannot be concluded that the proposed siting is the least damaging option available.

The deficiencies are further evident in the assessment of cable routing and landfall. The application lacks sufficient evidence that alternative routes have been thoroughly investigated to avoid or minimise effects on sensitive receptors, including areas of cultural and spiritual significance such as Barvas Cemetery. The absence of a clear avoidance strategy and the failure to conduct a comparative analysis suggest that mitigation by design has not been utilised, resulting in a reliance on post-design measures for mitigation.

Consequently, the application does not demonstrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This inadequacy represents a failure to adhere to the established mitigation hierarchy, which prevents the competent authority from determining whether more suitable and less harmful alternatives exist. The absence of a robust assessment of alternatives raises questions regarding the sustainability and policy compliance of the proposal.

From a policy standpoint, this deficiency compromises compliance with National Planning Framework 4, specifically in relation to the protection of natural spaces, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment constitutes a material omission, reinforcing the conclusion that the application has not been adequately evaluated, thereby hindering a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is insufficient and fails to offer a comprehensive understanding of ecological receptors. This region is characterised by its biological activity and sensitivity, yet the baseline data provided is incomplete, and the methodologies utilised do not adequately capture the presence, behaviour, and habitat use of marine species. Consequently, the assessment lacks a solid evidential basis for evaluating impacts.

A significant gap in the assessment concerns otters, classified as a European Protected Species. The application does not adequately acknowledge or evaluate their active use of coastal areas for foraging and movement. This oversight extends to their core foraging range and behavioural patterns, leaving the potential effects of construction disturbances, noise, and increased activity inadequately assessed. This deficiency undermines any conclusions drawn regarding the absence of significant effects on this species.

Further shortcomings are evident in the assessment of basking sharks, where a reliance on aerial surveys introduces notable detection bias, particularly in the challenging conditions of the Atlantic. This method likely results in an underestimation of their presence when compared to established land-based observations that indicate frequent usage of these waters. The neglect to incorporate or thoroughly consider such data leads to an incomplete baseline and diminishes the reliability of the conclusions reached.

These methodological shortcomings mean that assertions of negligible or non-significant effects are largely based on assumptions rather than solid evidence. The lack of adequate baseline data also hampers the meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This introduces uncertainty regarding the actual level of risk to marine species and habitats.

Regulatory requirements under the Environmental Impact Assessment regime and National Planning Framework 4 are not met, as the application fails to properly identify or assess protected species. The uncertainty created prevents the exclusion of adverse effects beyond reasonable scientific doubt, invoking the precautionary principle. Therefore, 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 inadequacies obstruct a robust evaluation of impacts on marine ecology and protected species, leading to the overall conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally unreliable, exhibiting internal inconsistencies and substantial gaps in evidence that compromise its conclusions. Seabird populations along the west coast of the Isle of Lewis, many of which are already experiencing declines, are internationally important. However, the application fails to sufficiently demonstrate, in line with evidential standards, that these species will not face adverse effects. This development is situated within critical foraging areas and migratory routes, yet the implications of potential displacement, collision risk, and habitat loss are inadequately evaluated.

A significant contradiction is evident, as the developer claims there will be no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only relevant when substantial harm is anticipated. This inconsistency raises serious questions about the credibility of the assessment and suggests that its conclusions are not backed by the necessary evidence. The assessment neglects to provide adequate proof that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is insufficiently recognised, and reliance on modelling techniques introduces additional uncertainty, particularly for species like

Kittiwakes and Fulmars, which are already in critical decline. The methodologies employed may underestimate mortality rates, especially given the lack of comprehensive baseline data and a limited understanding of behavioural responses.

The siting of turbines within a recognised migratory corridor presents a further significant risk, acting as a barrier along a primary flight path used by birds migrating between the United Kingdom and Iceland. The application does not adequately assess the long-term consequences of increased mortality in this corridor or the potential impacts on species with relatively small global populations. From a regulatory standpoint, the application does not meet the required evidential threshold to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, along with data deficiencies and modelling challenges, indicates that the standard of beyond reasonable scientific doubt has not been fulfilled. This invokes the precautionary principle, rendering a lawful conclusion in support of consent impossible.

Moreover, the identified deficiencies signify a failure to adhere to National Planning Framework 4 concerning biodiversity protection and the preservation of natural assets. The inability to demonstrate that internationally important seabird populations will remain unscathed places the proposal in direct opposition to national policy. Collectively, these issues of internal inconsistency, methodological flaws, and lack of evidence impede a robust evaluation of impacts, leading to the overall conclusion that the application fails to meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The treatment of cultural heritage and community identity within the assessment is severely lacking, failing to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. Rather than appreciating the ongoing social, cultural, and spiritual significance of heritage, the application adopts a simplistic view, treating it as a collection of isolated, static assets.

Particularly concerning is the inadequate consideration of culturally important sites, such as the cemeteries located at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet they are reduced to static features in the assessment. This oversight ignores their continued significance and the potential impact of development on their surroundings, resulting in a flawed evaluation of cultural effects and a neglect of their importance in community life.

Additionally, the application neglects to address intangible cultural heritage elements like the Gaelic language, local traditions, and the longstanding relationship between the community and the coastal environment. These aspects are vital to the area's identity but are completely omitted from the assessment, which represents a major shortfall. The cultural ramifications of the development cannot be accurately grasped without acknowledging these factors.

Moreover, there are serious issues regarding community rights and engagement. The Gaelic-speaking population, identified as having a distinct cultural identity akin to that of Indigenous Peoples, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement not only undermines the validity of the assessment but also contradicts established principles of participation in decisions impacting cultural and environmental interests.

A notable procedural shortcoming is the absence of a compliant Island Communities Impact Assessment, which is a legal requirement stipulated by the Islands (Scotland) Act 2018. Without this essential assessment, the competent authority cannot meet its legal obligations to evaluate the social, cultural, and economic effects on the island community. This alone renders a lawful determination impossible.

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

In summary, the neglect to assess living heritage, intangible cultural value, community rights, and statutory requirements culminates in a significant evidential gap. The cultural impacts of the proposed development have not been adequately evaluated, and the application lacks a solid foundation 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 significant concern. The developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the full report has not been made available. This lack of access creates a substantial evidential gap, which hinders the public and the competent authority from fully grasping the range of social risks identified through the developer’s own research.

Reports indicate that residents are currently experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These observations stem from direct engagement with the community and are not speculative in nature. The decision to withhold the full assessment restricts meaningful scrutiny of the findings and limits the ability to gauge their significance within the decision-making framework.

Furthermore, there are indications that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Nonetheless, these impacts have not been thoroughly incorporated into the main application nor given the appropriate weight they deserve. The absence of the complete Social Impact Assessment obscures the true social and human costs associated with the development.

This deficiency in transparency has implications for 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 complete dataset, the application lacks a solid evidential foundation for weighing the benefits against the potential harms.

From a policy standpoint, the application does not adequately demonstrate alignment with the National Planning Framework 4 concerning health and wellbeing. It is essential that development supports positive health outcomes and mitigates harm. However, existing evidence points to adverse effects that have not been fully disclosed. Without access to the complete assessment, it is impossible to establish compliance with this policy.

The procedural consequences are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without the full Social Impact Assessment. This gap represents a significant omission in the application and signifies a failure to satisfy the evidential requirements dictated by the Environmental Impact Assessment regime.

In conclusion, the withholding of the complete Social Impact Assessment, coupled with evidence of current adverse impacts, results in an incomplete and unreliable evaluation. This situation obstructs a lawful determination and reinforces the assertion that the application lacks sufficient information to support its case.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

Furthermore, the application inadequately represents the magnitude of the anticipated visual change. The size and proximity of the turbines are such that they would dominate views from residential areas, historic sites, and popular coastal locations. This would have a direct effect on visual amenity and undermine the landscape's defining qualities of naturalness and remoteness. The assessment fails to adequately articulate the level of impact or its significance within the context of this sensitive landscape.

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

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

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

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The application lacks sufficient detail regarding construction and pollution risks, which is necessary to assess likely environmental impacts. It proposes substantial seabed preparation and installation works within a high-energy Atlantic environment but does not provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it depends on mitigation and contingency measures to be developed after consent, which prevents a meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures is troubling due to the sensitivity of the surrounding environment. The West Lewis coastline has clean coastal waters and important habitats that are vulnerable to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it does not offer adequate details on how these risks

will be prevented, controlled, or monitored.

Uncertainty also exists regarding the scale and behaviour of sediment plumes from seabed disturbance and cable installation. Without thorough modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty extends to potential effects on marine species and habitats that have been recognised as sensitive in the wider assessment.

The lack of detailed emergency response procedures further exacerbates these issues. By postponing contingency planning to a post-consent stage, the application hampers the evaluation of whether appropriate safeguards are in place to respond to pollution events. This introduces procedural risk and diminishes the ability of the competent authority to assess environmental protection measures before making a determination.

From a regulatory viewpoint, deferring critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Likely significant effects and mitigation must be evaluated prior to consent, and the absence of such information renders a lawful determination impossible. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The proposal is fundamentally flawed due to several critical deficiencies in its assessment of fisheries and marine life, which do not adequately address ecological or socio-economic impacts. The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry. However, the application fails to provide assurances that these vital uses and habitats will be protected from significant disruption.

One of the major shortcomings of the proposal is the assumption that fishing activity can simply be displaced without repercussions. The application lacks any evidence to support the claim that alternative fishing grounds are available, accessible, or capable of absorbing the additional pressure that displacement would cause. This oversight is crucial, as it poses a risk of overfishing in alternative areas and could have broader economic implications for the local fishing fleet. Without a comprehensive, evidence-based assessment, the potential impacts on fisheries and local livelihoods remain obscure.

The application further jeopardises marine species, particularly due to the underwater noise expected from construction activities. The high-energy hammer piling proposed is

likely to generate disturbances that extend over considerable distances, impacting species such as dolphins. Concerns are particularly raised regarding the predicted effects on a significant portion of the local bottlenose dolphin population. Despite these serious implications, the application downplays these impacts without providing adequate supporting evidence.

A notable inconsistency exists within the application itself, acknowledging the necessity of licenses to permit harm to European Protected Species while simultaneously describing the impacts as negligible. This contradiction raises questions about the validity of the assessment and compliance with the Habitats Regulations, especially when harm is anticipated to a degree that necessitates legal approval.

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

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

In summary, the combination of inadequate evidence regarding fishing displacement, underestimation of acoustic impacts, and internal inconsistencies renders the assessment fundamentally incomplete and unreliable. These shortcomings obstruct a meaningful evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed assessment of the onshore infrastructure is fundamentally incomplete and neglects to address the full extent of impacts associated with this integrated project. The offshore turbines and onshore works are closely interconnected, yet they are evaluated separately, leading to a disjointed approach that conceals the overall environmental and socio-economic repercussions.

The onshore components encompass cabling across protected moorland, the construction of a substation near Stornoway, and necessary access routes through sensitive landscapes. These activities involve excavation through deep peat areas, particularly in Barvas Moor, which is an important carbon store and ecologically delicate habitat. The application falls short in delivering a thorough assessment of these impacts, thereby hindering a complete understanding of the project's environmental footprint.

By omitting or postponing the assessment of onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact

Assessment process mandates that all facets of a project be considered collectively; however, the division between offshore and onshore components prevents a comprehensive understanding of their combined impacts on peatlands, habitats, and communities.

Moreover, there are considerable risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application fails to prove that the impacts on these habitats have been fully evaluated or that suitable avoidance measures have been implemented. This results in a significant evidential gap regarding biodiversity protection.

Concerns also arise relating to carbon balance. Disturbing peatland releases stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy development. The application does not sufficiently address this matter or demonstrate that the overall carbon balance remains advantageous.

Additionally, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is no evidence provided that the required consents or processes have been initiated, which casts doubt on the project's feasibility and legal compliance.

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

In summary, the disconnection of project components, the lack of comprehensive assessment, and insufficient evidence concerning environmental and land use impacts render this segment of the application incomplete and unreliable, preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment lacks any assessment of dark skies and nocturnal wildlife, which is a significant omission. The West Lewis coastline is known for its exceptionally dark skies, which contribute to the area's environmental quality, cultural identity, and tourism appeal. However, the proposal introduces permanent red aviation lighting that is visible over great distances. This lighting would create a continuous "wall of light" across the western horizon, fundamentally changing the night-time environment.

There is also no evaluation of how this lighting will impact visual amenity, landscape character, or the experiences of residents and visitors. This is particularly concerning given the importance of dark skies to the region's identity and to emerging sectors like astro-tourism. The failure to address these impacts creates a notable gap in the landscape and environmental assessment.

Moreover, the application does not assess the impacts on nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are sensitive to artificial lighting, which can disorient them and increase collision risks. Without a lighting impact assessment or a phototaxis study, there is no evaluation of how the proposed aviation lighting may affect these species or potentially increase mortality rates.

This omission is further exacerbated by the use of daytime survey data in the ornithological assessment, which does not adequately reflect nocturnal activity or the associated risks. Species like Kittiwakes, which forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this risk has not been examined. The lack of site-specific night-time data results in a crucial gap in understanding the ecological impacts.

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

From a policy standpoint, these omissions conflict with National Planning Framework 4 concerning the protection of natural places and environmental quality. Furthermore, this undermines the overall assessment of landscape and seascape impacts, as the character of the night-time environment is a vital component of the ecosystem.

In summary, the absence of any assessment of dark skies and nocturnal wildlife represents a significant evidential gap. The failure to provide baseline data, impact modelling, and species-specific analysis leaves the application incomplete and unable to support a lawful determination.

TOURISM

The 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 proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements for sustainable development in light of statutory duties, national policy, and evidential standards. It echoes the main issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. Despite being presented under a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application falls short.

A complete and reliable evidential basis for determination is lacking. There are significant gaps in baseline data, the use of an undefined design envelope persists, and the mitigation measures proposed are not clearly specified. Additionally, critical impact pathways, such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism, have been omitted. As a result, the Environmental Impact Assessment is incomplete, hindering a full understanding of the likely significant effects or residual impacts.

Procedural failures are evident in the application as well. The lack of a compliant Island Communities Impact Assessment breaches statutory duties as outlined in the Islands (Scotland) Act 2018. Furthermore, the non-disclosure of the full Social Impact Assessment is a material omission. These deficiencies inhibit the competent authority from adequately assessing impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal conflicts with National Planning Framework 4, as it does not demonstrate adequate protection of biodiversity, natural places, and cultural heritage. It fails to show that health and wellbeing impacts are acceptable and cannot substantiate a net economic benefit, given the absence of tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been properly evaluated, obscuring impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and may be significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in certain areas, inconsistent. The evidential threshold necessary to demonstrate the absence of adverse effects beyond reasonable scientific doubt has not been achieved, necessitating the application of the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

In conclusion, the application is unfit for determination both procedurally and substantively. The considerable information deficiencies, alongside policy conflicts and unresolved environmental risks, impede a lawful and evidence-based decision. Therefore, the competent authority is urged to refuse consent on these grounds or to invoke the necessary regulatory provisions to obtain the missing information.

A formal request is made for the application for the Spiorad na Mara Offshore Wind Farm to be refused in its entirety.

Yours faithfully,

[Redacted]

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: 99E02BA0

Member of the public 1372

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under marine licensing and Environmental Impact Assessment frameworks. A review of the Environmental Impact Assessment Report and its supporting documentation reveals significant planning, environmental, cultural, and procedural deficiencies. The development is proposed off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise from the scale, proximity, and design of the project, challenging its compatibility with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient 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 its impact. The use of a flexible design framework obscures likely significant effects, while unspecified mitigation measures prevent assessment of their effectiveness. Consequently, the documentation does not facilitate a fully informed understanding of the environmental, cultural, or community impacts, and the assertion of negligible or non-significant effects lacks robust evidence.

Substantive policy conflicts are evident. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements for protecting biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests necessary for consent and jeopardise the ability of the competent authority to deem the development acceptable from a policy standpoint.

The unprecedented scale of the proposal, with large turbines situated near the shoreline, raises significant concerns about landscape capacity, visual dominance, and environmental impact. The combination of inadequate information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance 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 presents a number of significant deficiencies that compromise its reliability and transparency regarding the potential

environmental effects of the proposed development. One of the most critical issues is the use of a flexible Project Design Envelope, which lacks specificity concerning turbine dimensions, layouts, or configurations. This approach introduces a level of uncertainty that undermines the assessment's integrity, as it prevents a consistent application of worst-case scenarios. Consequently, the impacts outlined may not accurately represent those of the final development, obscuring the true extent of environmental effects from both the public and the competent authority.

Furthermore, the application relies on mitigation measures, monitoring strategies, and management plans that have yet to be established. This reliance implies that environmental harm will be addressed after consent is granted, hindering any meaningful evaluation of the effectiveness of these measures and preventing a thorough assessment of residual impacts. This deferral of essential information to a post-consent phase is procedurally unacceptable and contradicts the core objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation be clearly identified prior to determination.

Additionally, there are major evidential gaps, including inadequate baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. These shortcomings create uncertainty about the scale and significance of the impacts, especially when negligible or non-significant effects are asserted without solid supporting data. The lack of comprehensive information obstructs a clear understanding of cumulative and worst-case impacts, thereby generating scientific uncertainty that fails to meet statutory obligations.

As a result, the application does not satisfy the evidential criteria outlined in the Habitats Regulations, which require the exclusion of adverse effects beyond reasonable scientific doubt. This raises concerns under the precautionary principle, particularly concerning protected species and sensitive habitats. Moreover, the proposal does not align with National Planning Framework 4 stipulations regarding biodiversity protection and environmental integrity, as it has not been demonstrated that the impacts have been comprehensively assessed or that suitable safeguards are in place.

In summary, the combination of an undefined design envelope, unspecified mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These significant deficiencies impede a lawful and robust assessment of environmental effects, placing the competent authority in a position where it cannot make an informed determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The proposed application does not adequately assess alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of providing a structured and reasoned comparison of realistic alternatives based on environmental effects, it presents a narrative account of project evolution. This method

does not demonstrate that the developer has properly identified, assessed, and selected less harmful options in preference to more damaging solutions.

Moreover, there is a lack of transparent and evidence-based comparisons of alternative offshore locations, development scales, or design configurations. Notably, the application does not indicate that the possibility of placing turbines further offshore has been seriously considered, where it is likely that visual, ecological, and coastal impacts would be reduced. The sensitivity of the West Lewis coastline and the importance of proximity to shore in determining impact highlight the need for such analysis. The failure to include this information prevents any conclusion that the proposed siting represents the least damaging option.

These shortcomings also apply to cable routing and landfall assessment. Insufficient evidence is provided to show that alternative routes have been adequately explored to avoid or minimise impacts on sensitive receptors, including areas of cultural and spiritual significance like Barvas Cemetery. The absence of a clear avoidance strategy and a lack of comparative analysis suggest that mitigation by design has not been implemented, relying instead on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through site selection, layout, and infrastructure routing. This lack of adherence to the established mitigation hierarchy hinders the competent authority's ability to ascertain whether less harmful and more appropriate alternatives exist. Without a comprehensive assessment of alternatives, it cannot be concluded that the proposal represents a sustainable or policy-compliant solution.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The application presents significant deficiencies in its assessment of marine ecology and protected species, failing to establish a complete and reliable understanding of ecological receptors within the West Lewis coastal environment. The marine system in question is notably sensitive and biologically active; however, the baseline data provided is incomplete, and the methodologies employed do not effectively capture essential information regarding species presence, behaviour, and habitat use. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

A critical oversight involves otters, which are classified as a European Protected Species. The application does not adequately recognise or assess the active use of coastal areas by otters for foraging and movement. This gap in consideration of their

core foraging range and behavioural patterns means that the potential effects of construction disturbance, noise, and increased activity remain inadequately evaluated. As a result, conclusions drawn regarding the absence of significant effects on otters are undermined.

Further issues arise in the assessment of basking sharks. The reliance on aerial surveys leads to a significant detection bias, particularly under Atlantic conditions. This method is likely to underestimate the presence of basking sharks when compared with established land-based observations, which indicate that these waters are frequently utilised by the species. The failure to incorporate or adequately address such data contributes to an incomplete baseline and further undermines the reliability of the conclusions reached.

The methodological limitations identified mean that the conclusions drawn regarding negligible or non-significant effects are based more on assumptions than on robust evidence. The lack of sufficient baseline data hinders meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This generates uncertainty regarding the actual 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 it fails to properly identify or assess protected species. The uncertainty created by these deficiencies precludes the possibility of excluding adverse effects beyond reasonable scientific doubt, thus necessitating the application of the precautionary principle. Under these circumstances, the granting of consent cannot be legally justified.

In conclusion, the assessment is rendered unreliable due to incomplete baseline data, flawed methodologies, and unsupported conclusions. These shortcomings prevent a thorough evaluation of impacts on marine ecology and protected species, leading to the overarching conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development raises serious concerns due to significant gaps in evidence and contradictions that undermine its findings. There are internationally important seabird populations on the west coast of the Isle of Lewis, many of which are already in decline. However, the application fails to demonstrate that these species will not be adversely affected. Key foraging areas and migratory pathways are located within the development site, yet the evaluation does not adequately consider the risks of displacement, collision, or habitat loss for these seabirds.

There is a crucial inconsistency within the application itself. The developer claims there will be no significant adverse effects while also presenting a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This contradiction casts doubt on the credibility of the assessment and indicates that its

conclusions lack the necessary evidence.

The assessment does not sufficiently establish 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 addressed, and the reliance on modelling introduces uncertainty, especially for species like Kittiwakes and Fulmars, which are in severe decline. The methodologies used are likely to underestimate potential mortality, particularly where baseline data is insufficient and the behavioural responses of seabirds are not comprehensively understood.

The placement of turbines within a recognised migratory corridor poses an additional risk, creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not adequately assess the long-term consequences of sustained mortality within this corridor or the potential impact on species that have relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory findings, along with data gaps and limitations in the modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation engages the precautionary principle and hinders a lawful conclusion in favour of consent.

Moreover, these identified deficiencies represent 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 places the proposal in direct conflict with national policy.

Overall, the assessment is unreliable due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. These issues prevent a thorough evaluation of the impacts and lead to the conclusion that the application does not fulfil the statutory requirements essential for approval.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The application lacks a comprehensive assessment of community rights and engagement, particularly regarding the Gaelic-speaking population, which embodies characteristics of an Indigenous People. Notably, there has been no process of Free, Prior and Informed Consent conducted, which undermines the legitimacy of the assessment. This absence of meaningful engagement fails to adhere to established principles concerning participation in decisions that affect cultural and environmental interests.

Furthermore, the evaluation of cultural heritage and community identity is fundamentally inadequate, as it overlooks the West Lewis coastline's status as a living cultural landscape, where environment, language, tradition, and community are

intrinsically linked. The assessment adopts a reductive perspective, viewing heritage merely as a collection of isolated, static assets and neglecting their ongoing social, cultural, and spiritual significance within the community.

An important deficiency is found in the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are active sites of burial and spiritual practice; however, the assessment incorrectly categorises them as static features, disregarding their continued use, meaning, and the impact of development on their setting. This mischaracterisation leads to an incomplete evaluation of cultural effects and neglects their essential role in community life.

The application also fails to consider intangible cultural heritage, including the Gaelic language, traditions, and the longstanding relationship between the community and the coastal environment. These elements are central to the area's identity but are entirely omitted from the assessment, creating a significant gap. The cultural impact of the development remains unclear without the inclusion of these factors.

Moreover, a critical procedural oversight is evident in the lack of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. The absence of this assessment prevents the competent authority from fulfilling its legal obligation to evaluate the social, cultural, and economic impacts on the island community, rendering the determination unlawful.

From a policy standpoint, these shortcomings place the proposal at odds with the National Planning Framework 4, especially regarding the protection of historic assets and places. The failure to adequately address both tangible and intangible heritage, along with the neglect of living cultural practices, is a clear deviation from policy requirements.

Collectively, the oversight in assessing 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 evaluated, and the application fails to establish a sufficient basis for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal lacks transparency and depth in assessing social impacts, health, and wellbeing, which is critical for a lawful evaluation. Although the developer commissioned a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This absence signifies a notable evidential gap, hindering both public insight and the competent authority's understanding of the social risks identified in the developer's own research.

Summaries suggest that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts arise from direct community engagement and are not speculative in nature. However,

without access to the complete assessment, there is limited capacity for proper scrutiny of these findings, which in turn restricts the evaluation of their significance in the decision-making process.

Furthermore, there is clear evidence indicating that the proposal is viewed as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Unfortunately, these impacts have not been thoroughly integrated into the main application, nor have they received the weight they warrant. The failure to disclose the full Social Impact Assessment obscures the actual human and social costs associated with the development.

This lack of transparency undermines the Environmental Impact Assessment process. An exhaustive understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functionality are at stake. By withholding the full dataset, the application does not provide a complete evidential basis necessary for weighing benefits against potential harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Developments should promote positive health outcomes and mitigate harm, yet the evidence at hand reveals adverse effects that remain undisclosed. Without the full assessment, compliance with this policy cannot be validated.

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

In summary, the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing adverse effects, renders the assessment inadequate and unreliable. This situation obstructs a lawful determination and reinforces the notion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The application presents significant deficiencies in its assessment of seascape, landscape, and visual impacts, failing to adequately capture the extent of change and the sensitivity of the environment. Notably, the West Lewis coastline features an open Atlantic horizon, an undeveloped character, and a pronounced sense of remoteness. The planned installation of large-scale turbines near the shoreline would introduce an overwhelming industrial presence, fundamentally changing this character and leading to a permanent and irreversible transformation of the landscape.

The assessment does not sufficiently represent the magnitude of the anticipated visual changes. Due to the scale and proximity of the turbines, they would dominate the views

from residential areas, historic sites, and popular coastal locations. This would severely impact visual amenity and diminish the defining characteristics of naturalness and remoteness. Moreover, the assessment fails to adequately convey the level of impact or its significance within such a sensitive landscape.

Concerns also arise regarding the methodology employed in the selection and presentation of visual viewpoints. There is evidence to suggest 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 oversight raises the possibility that the extent of visual impact has been underestimated, thereby compromising the reliability of the assessment.

A critical shortcoming is the failure to evaluate the interconnectedness of landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a wider landscape setting, connected through visual and spatial relationships to the Atlantic horizon. The assessment mistakenly treats these as isolated assets, neglecting their interdependence and resulting in an incomplete evaluation of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal contravenes the National Planning Framework 4, particularly regarding the safeguarding of natural environments and historic assets. The degree of change proposed 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 assessment further weakens any assertion of compliance with policy.

Additionally, it is evident that the identified impacts cannot be effectively mitigated. The turbines' size, height, and proximity would ensure their presence remains dominant and unavoidable. Consequently, the resulting change is fundamental and permanent, incapable of being reduced to an acceptable level through mitigation efforts.

In summary, the assessment fails to accurately represent the scale of the 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 inconsistent with the necessary protections for 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 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 raises significant concerns regarding the routing of infrastructure through active croft land, which may conflict with existing land use and legal rights. There is a lack of evidence indicating that necessary consents or processes have been initiated, leading to questions about the deliverability and lawful implementation of the project.

Moreover, the assessment of the project's onshore infrastructure is materially incomplete, neglecting to consider the full extent of impacts arising from what is a single integrated project. The offshore turbines and onshore works are intrinsically

linked, yet they are assessed separately. This fragmented approach obscures the true scale of environmental and socio-economic effects.

Key onshore elements involve cabling across protected moorland and the construction of a substation near Stornoway, along with associated access infrastructure that traverses sensitive landscapes. Notably, these works require excavation across areas of deep peat, especially within Barvas Moor, a significant carbon store and ecologically sensitive habitat. The application fails to provide a comprehensive assessment of these impacts, inhibiting a full understanding of the project's overall environmental footprint.

The exclusion or deferral of onshore impact assessments prevents a proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all components of a project are considered collectively. However, the separation of offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities are not fully understood.

Furthermore, there are significant risks to sensitive habitats, such as machair systems and peatland environments, which are subject to policy protection. The application does not demonstrate that impacts on these habitats have been adequately assessed or that suitable avoidance measures have been implemented, resulting in a clear evidential gap concerning biodiversity protection.

Additionally, the proposal raises concerns about carbon balance. Disturbing peatland can release stored carbon, potentially creating a carbon debt that contradicts the aims of renewable energy development. The application does not sufficiently address this matter or prove that the overall carbon balance remains favourable.

From a policy perspective, the failure to assess the project as a cohesive whole and to demonstrate 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 undermines the credibility of the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of any assessment of dark skies and nocturnal wildlife within the Environmental Impact Assessment represents a critical shortfall. The West Lewis coastline, known for its exceptionally dark skies, is integral to the area's environmental quality, cultural identity, and tourism value. However, the proposal includes permanent red aviation lighting that will be visible over long distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon, thereby fundamentally altering the night-time environment.

The application fails to consider the impacts of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This oversight is particularly significant given the importance of dark skies to the area's identity and the emerging sectors in tourism, such as astro-tourism. Consequently, there exists a significant gap in the overall landscape and environmental assessment.

Moreover, there has been no evaluation of the impacts on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are especially sensitive to artificial lighting, as it can lead to disorientation and increased collision risks. The application lacks a lighting impact assessment or a phototaxis study, failing to evaluate the potential effects of aviation lighting on these species or the potential for increased mortality.

This lack of assessment is aggravated by the dependence on daytime survey data in the ornithological assessment, which does not adequately capture nocturnal activity or associated risks. Kittiwakes, for example, may forage or migrate at night and could also be disoriented by artificial lighting; yet this risk has gone unassessed. Without site-specific night-time data, there remains a critical gap in understanding the ecological impacts.

In the absence of an evaluation of nocturnal impacts, it becomes impossible to ascertain whether protected species or designated sites may be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt cannot be achieved, invoking the precautionary principle and hindering a lawful determination.

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

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

TOURISM

The economic impact assessment associated with this application is fundamentally flawed and does not adequately address the implications for a vital sector of the Isle of Lewis economy. With 86% of visitors attracted by the area's stunning scenery, the application should have quantified how large-scale offshore infrastructure would influence visitor numbers, their behaviours, and the overall economic contribution of tourism. Instead, it neglects to model the potential consequences of industrialising the seascape and degrading environmental quality on tourism's Gross Value Added and the broader economic resilience of the island.

Tourism has seen remarkable growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing as much as 16% of the island's economy. This growth highlights the critical importance of tourism to the local community, yet the application fails to assess how the proposed changes could compromise this established and burgeoning sector. The absence of a thorough analysis leaves uncertainty regarding whether the development could provide any net economic advantage.

Environmental quality is essential to the tourism sector, particularly the preservation of unspoiled landscapes and dark skies that enhance the visitor experience and support emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this issue, creating a significant gap in understanding the proposal's potential impacts on an increasingly recognised facet of the local economy.

In an island community characterised by limited economic diversification, the neglect to evaluate tourism impacts raises broader concerns about employment, the viability of local businesses, and community sustainability. Furthermore, the lack of a compliant Island Communities Impact Assessment means these economic vulnerabilities remain unexamined, contrary to the requirements of 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 of proving net benefit. It also fails to align with strategic goals that prioritise tourism as a growth sector, lacking sufficient evidence for the competent authority to evaluate the economic repercussions of the proposal adequately.

Overall, the combined shortcomings in quantifying tourism impacts, assessing environmental influences on visitor behaviour, and considering the island's economic dependencies create a considerable evidential void. This absence hinders a comprehensive assessment of the economic effects, leading to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the requirements of sustainable development when evaluated against statutory duties, national policy, and evidential standards. It mirrors the critical issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the degree of industrialisation was deemed unacceptable. This current application, despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, does not rectify these concerns.

There are substantial deficiencies in the evidential basis for this application. It lacks complete and reliable baseline data, utilises an undefined design envelope, and

depends on unspecified mitigation measures. Furthermore, key impact pathways, such as those relating to nocturnal wildlife, onshore infrastructure, and tourism effects, have not been addressed. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of likely significant effects or residual impacts.

Procedural failures are evident as well. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the failure to disclose a complete Social Impact Assessment constitutes a significant omission. These gaps hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, thereby rendering the application unfit for determination.

This proposal is also in direct violation of National Planning Framework 4. It does not demonstrate adequate protection of biodiversity, natural places, and cultural heritage, nor does it validate that health and wellbeing impacts are acceptable. The absence of tourism impact modelling raises questions about the proposed net economic benefits. Additionally, the cumulative effects of both offshore and onshore components have not been adequately assessed, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

The uncertainties surrounding environmental risks are concerning and potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also, in some instances, inconsistent. The evidence required to exclude adverse effects beyond reasonable scientific doubt has not been fulfilled, thus engaging the precautionary principle and preventing a lawful conclusion regarding acceptable impacts.

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

In summary, the application is procedurally and substantively unfit for determination. The multitude of information deficiencies, in conjunction with policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. It is imperative that the competent authority either refuses consent on these grounds or utilises the relevant regulatory provisions to mandate the submission of the missing information.

Therefore, I formally request that the application for the Spiorad na Mara Offshore Wind Farm be 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: D411C26A

Member of the public 1373

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 marine licensing and Environmental Impact Assessment regimes. The review of the Environmental Impact Assessment Report and its supporting documentation reveals significant deficiencies across planning, environmental, cultural, and procedural aspects. This development is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and robust cultural identity. The proposal's scale, design, and proximity to the shoreline raise serious questions about its alignment with statutory requirements, national policy, and sustainable development principles.

There is a concerning lack of adequate evidential support for a lawful determination within the application. It is evident that critical environmental data is absent, baseline information is both limited and inconsistent, and key components of the proposal remain unspecified. The use of a flexible design framework complicates the assessment of likely significant effects, while the reliance on unspecified mitigation measures renders their effectiveness unassessable. Consequently, the documentation fails to provide a comprehensive or informed understanding of the potential environmental, cultural, or community impacts, and claims asserting negligible or non-significant effects lack robust evidence.

The proposal is marked by clear and substantive conflicts with established policies. It is inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural spaces, cultural heritage, and health and wellbeing. The application does not satisfactorily demonstrate adherence to national requirements for protecting biodiversity, climate considerations, and environmental integrity. Such conflicts directly challenge the statutory tests necessary for consent and weaken the competent authority's ability to deem the development acceptable within policy frameworks.

The unprecedented scale of this proposal, with large turbines located close to the shoreline, raises significant concerns about landscape capacity, visual dominance, and environmental impact. In light of the insufficient information presented, reliance on undefined mitigation strategies, evident evidential weaknesses, and clear policy non-compliance, it is apparent that the application is incomplete and incapable of facilitating a lawful determination. Under these circumstances, the precautionary principle must be applied.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species is inadequate and does not deliver a thorough or trustworthy understanding of the ecological receptors in the West Lewis coastal area. This marine environment is sensitive and biologically rich. However, the baseline data is lacking, and the methodologies employed do not effectively capture the presence, behaviour, and habitat usage of various species. Consequently, the assessment fails to provide a strong evidential basis for evaluating potential impacts.

One significant oversight is the treatment of otters, a species protected under European law. The application does not adequately acknowledge or assess their active use of the coastal areas for foraging and movement. This absence of consideration regarding their core foraging range and behavioural patterns means that the potential impacts of construction disturbances, noise, and increased human activity have not been sufficiently evaluated. This flaw undermines any assertions about the absence of significant effects on otters.

Deficiencies also appear in the assessment of basking sharks. The reliance on aerial surveys introduces considerable detection bias, particularly under Atlantic conditions, which is likely to lead to an underestimation of their presence. This is particularly evident when compared to well-established land-based observations that highlight frequent use of these waters. The neglect to incorporate or adequately consider such data contributes to an incomplete baseline and diminishes the reliability of the presented conclusions.

These methodological shortcomings result in conclusions of negligible or non-significant effects being based more on assumptions than on solid evidence. The lack of sufficient baseline data also hampers a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises questions about the actual risks to marine species and their habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment process and the National Planning Framework 4, as it has not properly identified or assessed protected species. The level of uncertainty introduced means that it cannot be confidently claimed that adverse effects are excluded beyond reasonable scientific doubt, which invokes the precautionary principle. Thus, consent cannot be lawfully granted in these circumstances.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally important seabird populations that are already in decline. The ornithological assessment associated with

the proposed development contains significant gaps in evidence and internal inconsistencies that undermine its conclusions. It fails to demonstrate, to the required evidential standard, that these species will not be adversely affected. The development is situated within key foraging areas and migratory pathways, yet the assessment does not adequately evaluate the implications of potential displacement, collision risk, or habitat loss.

A fundamental contradiction exists within the application. The developer concludes that there will be no significant adverse effects while simultaneously making a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This inconsistency raises concerns about the reliability of the assessment, suggesting that the conclusions presented lack adequate support from the underlying evidence. Furthermore, the assessment does not provide sufficient proof that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. It fails to fully account for the importance of these feeding grounds, and the reliance on modelling approaches introduces uncertainty, particularly for species experiencing severe declines, like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, especially where baseline data is incomplete and the behavioural responses of species are not well understood.

The placement of turbines within a recognised migratory corridor presents an additional risk, creating a barrier within a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term implications of sustained mortality within this corridor or the potential impacts on species with relatively small global populations.

From a regulatory perspective, the application does not meet the evidential threshold required to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This invokes the precautionary principle and prevents a lawful conclusion in support of consent. Additionally, the identified deficiencies represent a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

Overall, the assessment is unreliable due to internal inconsistencies, methodological weaknesses, and insufficient evidence. These shortcomings hinder a robust evaluation of impacts and contribute to the conclusion that the application does not meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the cultural heritage and community identity associated with the West Lewis coastline is insufficient and does not acknowledge this area as a living cultural landscape, where the environment, language, tradition, and community are

intertwined. Instead of recognising the ongoing social, cultural, and spiritual functions of heritage, the application adopts a reductive stance, treating these elements as mere isolated and static assets.

Particularly concerning is the handling of culturally significant sites like the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet the assessment inaccurately categorises them as static features, neglecting their active use, significance, and the potential impact of development on their settings. This misrepresentation leads to an incomplete understanding of the cultural effects and overlooks their importance in community life.

The application also fails to consider intangible cultural heritage, such as the Gaelic language and traditions, as well as the longstanding relationship between the community and the coastal environment. These elements are vital to the area's identity but are entirely omitted from the assessment, representing a substantial oversight. Without acknowledging these factors, it is impossible to grasp the true cultural impact of the proposed development.

Concerns regarding community rights and engagement further exacerbate the situation. The Gaelic-speaking population has a unique cultural identity recognised as characteristic of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent conducted. This lack of meaningful engagement diminishes the legitimacy of the assessment and does not adhere to established principles for involving communities in decisions that affect their cultural and environmental interests.

A significant procedural oversight is the absence of a compliant Island Communities Impact Assessment, required by the Islands (Scotland) Act 2018. The failure to conduct this assessment hinders the competent authority’s ability to fulfil its legal obligations to evaluate the social, cultural, and economic impacts on the island community. This omission alone calls into question the legality of the determination process.

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 to account for both tangible and intangible heritage, alongside the disregard for living cultural practices, clearly deviates from policy requirements.

Overall, the combined failure to address 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 assessed, resulting in an application that fails to provide a sound basis for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The concerns surrounding the assessment of social impacts, health, and wellbeing highlight a critical deficiency in transparency that is necessary for a lawful evaluation.

While a Social Impact Assessment was commissioned by the developer and included engagement with local residents, the absence of the full report creates a substantial evidential gap. This gap hinders both public understanding and the competent authority's ability to grasp the complete range of social risks identified through the developer's own investigations.

Residents have reported experiencing measurable stress, anxiety, and concern linked to the scale and proximity of the proposed development. These impacts are not based on speculation, as they are derived from direct community engagement. Nonetheless, the lack of access to the complete assessment prevents thorough scrutiny of these findings, thereby limiting the capacity to weigh their significance in the decision-making process.

Moreover, there is evidence that the proposal is viewed as a threat to community identity and cohesion, with the developer's own findings indicating a risk of "cultural loss." Despite the identification of such impacts, they have not been adequately incorporated into the main application nor given the appropriate consideration. By withholding the full Social Impact Assessment, the true human and social costs of the development remain obscured.

This lack of transparency has serious implications for the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health implications is crucial for projects of this magnitude, especially when community character and functioning may be at stake. The application's failure to provide the complete dataset results in an inability to present a thorough evidential basis for evaluating the balance of benefits and detriments.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Developments should foster positive health outcomes and avoid negative consequences; however, existing evidence points to adverse effects that have not been fully disclosed. Without access to the complete assessment, demonstrating compliance with this policy is impossible.

The procedural consequences are significant, as the competent authority is unable to conduct a robust socio-economic and health evaluation without the full Social Impact Assessment. This omission represents a material flaw within the application and a failure to meet the evidential criteria of the Environmental Impact Assessment framework.

In conclusion, the combination of not disclosing the full Social Impact Assessment and evidence of ongoing adverse impacts results in an incomplete and unreliable assessment. This situation obstructs a lawful determination and reinforces the understanding that the application lacks sufficient information to warrant support.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of seascape, landscape, and visual impacts is significantly lacking, failing to appropriately capture the scale of change and the sensitivity of the receiving environment. The character of the West Lewis coastline is characterised by its expansive Atlantic horizon, undeveloped nature, and pronounced sense of remoteness. The proposed installation of large-scale turbines close to the shoreline would establish a continuous and overwhelming industrial presence, fundamentally altering this character and leading to a permanent and irreversible change to the landscape.

There is an inadequate representation of the extent of visual change in the application. The size and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This dominance would have a direct negative impact on visual amenity, compromising the essential qualities of naturalness and remoteness. The assessment does not adequately communicate this level of impact or its significance within the context of such a sensitive landscape.

Additionally, there are concerns regarding the methodology used for selecting and presenting 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 significant landscapes. This raises the possibility that the extent of visual impact has been downplayed, which undermines the reliability of the assessment.

Another critical shortcoming is the lack of consideration for the interconnected relationship between landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape context linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these cultural assets as separate entities, disregarding their interdependence and resulting in an incomplete evaluation of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4 concerning the safeguarding of natural places and historic assets. The magnitude of change is incompatible with the requirements to protect landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the lack of a thorough worst-case scenario assessment further challenges any claims of compliance with policy.

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 unavoidable and dominant. Therefore, the resulting change is fundamentally permanent, rather than amenable to reduction through mitigation efforts.

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 deficiencies hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is notably deficient, lacking the necessary detail to properly evaluate the likely environmental effects. The proposed works involve significant seabed preparation and installation activities within a dynamic Atlantic environment. However, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included in the application. Instead, it relies on mitigation and contingency measures that would be developed after consent, which obstructs any meaningful assessment of their adequacy and effectiveness.

This dependence on undefined future measures is particularly alarming due to the sensitivity of the environment in question. The West Lewis coastline is known for its clean coastal waters and significant habitats, both of which are susceptible to disturbances caused by sediment and contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on how these risks will be prevented, controlled, or monitored.

Furthermore, there is considerable uncertainty regarding the scale and behaviour of sediment plumes that may result from seabed disturbances and cable installations. Without thorough modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also pertains to potential consequences for marine species and habitats that have already been recognised as sensitive in the broader assessment.

Adding to these concerns is the lack of detailed emergency response procedures. By postponing contingency planning until after consent is granted, the application undermines the ability to evaluate whether adequate safeguards are in place for responding to pollution events. This creates procedural risks and hampers the competent authority's ability to assess environmental protection measures prior to determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements established under the Environmental Impact Assessment regime. Significant effects and necessary mitigation must be evaluated prior to granting consent, and without this information, a lawful determination cannot be achieved. Additionally, the application does not demonstrate compliance with relevant policy requirements related to environmental protection and water quality.

In summary, the lack of clearly defined mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts collectively render

the assessment materially inadequate. These deficiencies hinder a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem as well as an active fishing industry. However, the assessment of fisheries and marine life within the application is inadequate, failing to provide a thorough evaluation of both ecological and socio-economic impacts. There is a concerning assumption present in the application that fishing activity can simply be displaced without any repercussions. No evidence has been offered to suggest that alternative fishing grounds exist that would be accessible and capable of accommodating any additional pressure. This lack of information is critical, as such displacement poses risks of overfishing in other areas and can have wider economic ramifications for the local fishing fleet. Without a detailed and evidence-based assessment, the potential impacts on fisheries and the livelihoods of those dependent on them remain poorly understood.

Furthermore, there are significant risks posed to marine species, particularly due to the underwater noise anticipated during construction. The use of high-energy hammer piling over an extended duration is likely to disturb marine life across large distances, affecting species including dolphins. The predicted disturbance to a considerable portion of the local bottlenose dolphin population raises serious concerns; however, the application seems to downplay these potential effects without providing adequate supporting evidence.

The application displays a notable inconsistency, acknowledging the need for licences to permit harm to European Protected Species while simultaneously categorising these impacts as negligible. Such contradictions undermine the credibility of the assessment and raise serious questions regarding compliance with the Habitats Regulations, particularly when harm is expected to occur at a level that requires legal authorisation.

Additionally, the assessment neglects to take into account cumulative impacts that stem from multiple pressures, such as habitat disturbance, noise pollution, 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 proposal does not demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It fails to provide evidence that the development can coexist with current marine users or that it can avoid unacceptable impacts on marine biodiversity, thus precluding any conclusion regarding its status as sustainable development.

Overall, the shortcomings in evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal inconsistencies render the assessment

incomplete and unreliable. These inadequacies obstruct a comprehensive evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The incomplete assessment of onshore infrastructure undermines the understanding of the full extent of impacts associated with this integrated project. Although the offshore turbines and onshore works are intrinsically linked, they have been evaluated separately, which obscures the true scale of the environmental and socio-economic consequences. The lack of a comprehensive assessment means that the cumulative effects on sensitive habitats, peatlands, and local communities remain unclear.

Onshore elements encompass cabling across protected moorland, the construction of a substation near Stornoway, and associated access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and is an ecologically sensitive habitat. The application has not adequately addressed the impacts of these works, preventing a full understanding of the project's overall environmental footprint.

Moreover, there are serious risks to critical habitats, including machair systems and peatland environments that are protected by policy. The application fails to demonstrate that the impacts on these habitats have been thoroughly assessed or that appropriate measures to avoid harm have been implemented. This results in a significant evidential gap concerning biodiversity protection.

The proposal also raises vital concerns about carbon balance. Disturbance of peatland releases stored carbon, potentially leading to a carbon debt that contradicts renewable energy objectives. The application does not sufficiently tackle this issue or illustrate that the overall carbon balance remains beneficial.

Furthermore, routing infrastructure through active croft land poses conflicts with existing land use and legal rights. There is no evidence presented that the necessary consents or processes have been initiated, which raises questions about deliverability and lawful implementation.

From a policy standpoint, the failure to consider the project as a whole, alongside the lack of demonstrated protection for 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 mitigated or avoided significantly weakens the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife represents a substantial flaw within the Environmental Impact Assessment. The West Lewis coastline is notable for its exceptionally dark skies, which are integral to environmental quality, cultural identity, and tourism appeal. The proposal incorporates permanent red aviation lighting that would be visible over extensive distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon, fundamentally transforming the night-time environment.

There is no evaluation of how this lighting will impact visual amenity, landscape character, or the experiences of residents and visitors. This omission is critical given the significance of dark skies to the identity of the area and the growth of tourism sectors such as astro-tourism. As a result, there exists a clear gap in the overall landscape and environmental assessment.

Equally concerning is the lack of examination of impacts 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 cause disorientation and heighten the risk of collision. The application fails to provide a lighting impact assessment or phototaxis study, leaving unaddressed how aviation lighting may affect these species or lead to increased mortality.

This issue is exacerbated by the reliance on daytime survey data within the ornithological assessment, which does not account for 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 has not been assessed. The lack of site-specific night-time data creates a significant gap in understanding the ecological impacts.

In the absence of a proper assessment of nocturnal effects, it remains impossible to ascertain whether protected species or designated sites would face adverse impacts. The evidential standard required to rule out negative effects beyond reasonable scientific doubt is not satisfied, invoking the precautionary principle and hindering a lawful determination.

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

Collectively, the failure to assess dark skies and nocturnal wildlife presents a major evidential shortcoming. The absence of baseline data, impact modelling, and species-specific analysis renders the application incomplete and incapable of facilitating a lawful determination.

TOURISM

The application does not adequately assess the impacts on tourism, which is a crucial part of the Isle of Lewis economy. Tourism is significantly reliant on the area's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness. While it is noted that 86% of visitors are attracted by the scenery, there is no quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or overall economic contributions.

Tourism has experienced substantial growth, rising from £65 million in 2017 to over £81.5 million, while also supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. Despite this growth, the application lacks modelling on how the potential industrialisation of the seascape and loss of environmental quality could affect Tourism Gross Value Added and broader economic resilience. Without such essential analysis, it remains unclear if the development would provide a net economic benefit or harm a vital and expanding sector.

Moreover, the importance of environmental quality in enhancing tourism, including the value of unspoiled landscapes and dark skies, is overlooked. The failure to include a Dark Skies Assessment exacerbates this issue and creates a significant gap in understanding the potential impacts on a recognised and growing segment of the local economy, such as nature-based tourism and astro-tourism.

Given the limited economic diversification in the island community, not evaluating the impacts on tourism 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 properly examined, as required under the Islands (Scotland) Act 2018.

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

In summary, the shortcomings in quantifying tourism impacts, assessing the environmental factors that influence visitor behaviour, and recognising the island's economic dependency culminate in a significant evidential gap. This gap hinders a thorough evaluation of the economic effects and supports the assertion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the standards of sustainable development as mandated by statutory duties and national policy. It echoes the principal issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application

does not address these concerns adequately.

There are significant gaps in the evidential basis provided for the application. The reliance on an undefined design envelope, unspecified mitigation measures, and the lack of crucial impact assessments, such as those affecting nocturnal wildlife, complete onshore infrastructure, and tourism, renders the Environmental Impact Assessment incomplete. This inadequacy impedes a thorough understanding of the potential significant effects and residual impacts associated with the project.

Moreover, procedural shortcomings are evident, notably the absence of a compliant Island Communities Impact Assessment, which violates statutory requirements under the Islands (Scotland) Act 2018. The non-disclosure of a complete Social Impact Assessment is another critical omission. These failures hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal is also misaligned with the National Planning Framework 4. It does not demonstrate the necessary protections for biodiversity, natural environments, and cultural heritage, nor does it show that health and wellbeing impacts are manageable. Furthermore, the lack of tourism impact modelling means that a net economic benefit cannot be substantiated. The cumulative impacts of both offshore and onshore components have not been properly evaluated, obscuring their effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties regarding environmental risks persist, with incomplete assessments concerning marine ecology, seabirds, protected species, and marine mammals. The evidential threshold needed to demonstrate the absence of adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle. This failure prevents a lawful determination that impacts are acceptable.

The proposed development would also effect substantial and irreversible changes to a sensitive landscape. The industrialisation of the Atlantic-facing coastline, the degradation of dark skies, disruption to cultural and visual connections, and adverse impacts on tourism are permanent consequences that cannot be mitigated effectively.

In conclusion, the application is procedurally and substantively unfit for determination. The significant deficiencies in information, coupled with policy discrepancies and unresolved environmental risks, obstruct a lawful and evidence-based decision-making process. The competent authority should therefore refuse consent for the Spiorad na Mara Offshore Wind Farm application in its entirety.

Additional Comments

The islands of Lewis and Harris are some of the last parts of Scotland that remains a testament to the beautiful and rugged landscapes of the north.
Creating a massive wind farm off their shores creates not only a disaster for wildlife, it will also create an onshore infrastructure that will sully these lands forever.

Add in that the energy generated will not even directly benefit the people of Scotland, there is no good reason to build them where proposed.

Instead of using the coast of the Isle of Lewis as guinea pig for this infrastructure, perhaps locate it somewhere off the thousands of miles of coastline surrounding England instead. A higher population down south will also help you to understand the potential harm to health that this proposal will bring.

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: BFF8CB9C

Member of the public 1374

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection is grounded in a thorough review of the Environmental Impact Assessment Report and associated documentation, revealing significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The project is situated off the west side of the Isle of Lewis, a region notable for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The scale and design of the proposal, particularly its proximity to the shoreline, raise serious concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a solid evidential foundation for lawful determination. It presents critical gaps in environmental data, limited and inconsistent baseline information, and key elements of the proposal that remain undefined. The use of a flexible design framework hinders a clear assessment of potential significant effects. Furthermore, the reliance on unspecified mitigation measures renders it impossible to evaluate their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, and community impacts, and the claims of negligible or non-significant effects are unsupported by reliable evidence.

There are clear and substantive conflicts with existing policy. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially regarding biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts are central to 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, with large turbines positioned in close proximity to the shoreline, raises significant concerns about landscape capacity, visual dominance, and environmental impact. Collectively, the lack of sufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear non-compliance with policy underscore that the application is incomplete and incapable of sustaining a lawful determination. In light of these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies, failing to deliver a full, transparent, or reliable account of the potential environmental effects of the proposal. The introduction of a flexible Project Design Envelope, lacking specific commitments to turbine dimensions, layouts, or configurations, creates considerable uncertainty. This uncertainty undermines the integrity of the assessment and hinders a consistent application of a worst-case scenario. Consequently, the impacts outlined may not correspond to the actual development, leaving both the public and the competent authority without a clear understanding of the true extent of environmental effects.

Consent is sought based on the reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. This approach defers essential information to post-consent stages, obstructing any meaningful evaluation of effectiveness or assessment of residual impacts. Such procedural deficiencies contravene the intentions of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation measures are clearly established before any determination.

Moreover, there are critical evidential shortcomings, including gaps in baseline data and limitations in methodology, alongside a reliance on assumptions rather than site-specific evidence. This results in uncertainty about the scale and significance of impacts, particularly as conclusions of negligible or non-significant effects are presented without robust supporting data. The insufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that is inconsistent with statutory requirements.

As a result, the application does not satisfy the evidential threshold under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This activates the precautionary principle, especially regarding protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate compliance with National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it cannot be shown that impacts have been thoroughly assessed or that appropriate safeguards exist.

In conclusion, the combination of an undefined design envelope, the lack of specified mitigation, and gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings obstruct a lawful and robust assessment of environmental effects, leaving the competent authority unable to make a determination based on the information submitted.

MARINE ECOLOGY AND PROTECTED SPECIES

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

resulting in an assessment that lacks a solid evidential basis for evaluating potential impacts.

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

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

These methodological shortcomings mean that conclusions regarding negligible or non-significant effects are based on assumptions rather than robust evidence. The lack of sufficient baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty casts doubt on the true scale of risk posed to marine species and habitats.

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon and undeveloped nature, conveying a strong sense of remoteness. The introduction of large-scale turbines near the shoreline would create a continuous industrial presence, fundamentally altering this character and resulting in a permanent transformation of the landscape. The assessment of seascape, landscape, and visual impacts is materially deficient and fails to adequately reflect the scale of change or the sensitivity of the receiving environment.

The application inadequately represents the magnitude of the visual change. Due to the

scale and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations. This would significantly impact visual amenity and erode the defining qualities of naturalness and remoteness. The level of impact and its significance in the context of such a sensitive landscape have not been properly conveyed.

Methodological concerns arise regarding the selection and presentation of visual viewpoints. Evidence indicates that the viewpoints selected may not accurately represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the risk that the magnitude of visual impact is understated, thereby undermining the reliability of the assessment.

Moreover, the application fails to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are linked by visual and spatial relationships to the Atlantic horizon. Treating these heritage assets as isolated entities neglects their interdependence and results in an incomplete assessment of impacts on their setting and cultural significance.

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

From a policy perspective, the proposal conflicts with National Planning Framework 4 regarding the protection of natural places and historic assets. The scale of change is inconsistent with the requirement to safeguard landscape character, visual amenity, and the setting of culturally significant sites. Additionally, the lack of a robust worst-case assessment further weakens any claim of policy compliance.

The identified impacts cannot be effectively mitigated. Due to the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. The resulting changes are fundamental and permanent, rather than capable of reduction to an acceptable level through mitigation.

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

CONSTRUCTION AND POLLUTION RISKS

The application proposes substantial seabed preparation and installation works within a high-energy Atlantic environment. However, the assessment of construction and pollution risks is incomplete and lacks the necessary detail to evaluate the likely environmental effects. There are no fully developed Construction Environmental

Management Plans or Pollution Prevention Plans, as the application relies on mitigation and contingency measures to be prepared after consent. This reliance on undefined future measures is particularly concerning given the sensitivity of the receiving environment.

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

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

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

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

FISHERIES AND MARINE LIFE

The evaluation of the proposal is flawed and does not adequately assess the impacts on marine life and fisheries. The waters off the West Lewis coast are home to a diverse ecosystem and a thriving fishing industry. However, the application does not convincingly show that these important habitats and activities can be preserved without significant harm.

One major concern is the assumption that fishing can be easily displaced without negative consequences. The application does not provide any evidence that alternative fishing grounds are available or can support the increased pressure that displacement

would cause. This is a critical oversight, as it risks overfishing in other areas and could have broader economic implications for local fishermen. Without a detailed and evidence-based assessment, the potential impacts on fisheries and the livelihoods dependent on them remain unclear.

Additionally, the proposal poses considerable risks to marine species, particularly due to noise created during construction. The use of high-energy hammer piling for an extended duration is likely to disrupt marine life across extensive areas, particularly affecting dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is a serious concern, yet the application minimizes these impacts without adequate justification.

There is also a contradiction within the application regarding the need for licenses for harming European Protected Species, while simultaneously claiming that the impacts are negligible. This inconsistency undermines the trustworthiness of the assessment and raises questions about adherence to the Habitats Regulations, especially since harm appears to be expected to a level that requires legal approval.

Moreover, the assessment does not address the cumulative impacts from various pressures, such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough examination of these combined effects, the overall impact on marine ecosystems and economic conditions remains uncertain.

From a policy standpoint, the application fails to demonstrate compliance with the National Planning Framework 4 and the National Marine Plan. It does not prove that the development can coexist with current marine users or prevent unacceptable impacts on marine biodiversity. This lack of compliance hampers any assertion that the proposal supports sustainable development.

In summary, the shortcomings in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions all contribute to an incomplete and unreliable assessment. These issues inhibit a thorough understanding of the potential effects on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure remains notably incomplete and fails to acknowledge the full extent of impacts resulting from a single integrated project. The offshore turbines and onshore works are inherently connected, yet they are evaluated separately, leading to a fragmented assessment that obscures the true scale of environmental and socio-economic consequences.

Onshore components encompass cabling across protected moorland, the construction of a substation near Stornoway, and necessary access infrastructure through delicate landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which is a vital carbon store and ecologically sensitive habitat. The application lacks a thorough evaluation of these impacts, thus hindering a

comprehensive understanding of the project's overall environmental footprint.

By omitting or postponing the assessment of onshore impacts, the application obstructs a proper analysis of cumulative effects. The Environmental Impact Assessment process mandates that all facets of a project be considered collectively, yet the division of offshore and onshore elements results in a lack of clarity regarding the combined impacts on peatlands, habitats, and local communities.

There are considerable risks to sensitive habitats, including machair systems and peatland environments, which enjoy policy protection. The application fails to prove that the impacts on these habitats have been adequately assessed or that suitable avoidance measures have been taken. This results in a clear evidential gap concerning biodiversity protection.

Concerns also arise regarding carbon balance. The disturbance of peatland releases stored carbon, which could create a carbon debt that undermines the objectives of renewable energy development. The application does not sufficiently tackle this issue or show that the overall carbon balance remains beneficial.

Furthermore, the routing of infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application does not provide evidence that the 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 comprehensively and to ensure the protection of peatlands, habitats, and land use interests is at odds with the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be avoided or mitigated further weakens the application.

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

TOURISM

The economic importance of tourism to the Isle of Lewis cannot be overstated, as it has grown significantly 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. The application in question, however, inadequately assesses the potential tourism impacts, failing to evaluate the economic and social consequences for this vital sector. While it acknowledges that 86% of visitors are attracted by the area's scenery, there is a notable absence of a quantified analysis regarding how large-scale offshore infrastructure may influence visitor numbers, behaviour, or overall economic contribution.

Moreover, the assessment neglects the critical relationship between environmental quality and tourism. Unspoiled landscapes, dark skies, and a sense of remoteness are

essential components of the visitor experience, especially in emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this oversight, leaving a substantial gap in understanding the impacts on this recognised sector of the local economy. Additionally, the failure to model how the industrialisation of the seascape and degradation of environmental quality could affect Tourism Gross Value Added and overall economic resilience remains unaddressed.

In the context of a community with limited economic diversification, the shortcomings of the tourism impact assessment raise broader concerns regarding employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment further indicates that the economic vulnerabilities associated with this development have not been evaluated as mandated under the Islands (Scotland) Act 2018. This lack of assessment is particularly concerning given that the application does not demonstrate compliance with National Planning Framework 4, specifically regarding economic impact and the necessity to establish net benefit.

When considered collectively, the failures to quantify tourism impacts, evaluate environmental factors that drive visitor behaviour, and acknowledge the island's economic dependencies create a significant evidential gap. This undermines the ability to conduct a thorough evaluation of the economic effects, leading to the conclusion that the application is fundamentally incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm signifies a profound failure to meet the criteria for sustainable development in light of statutory obligations, national policy, and evidential standards. It revisits the fundamental issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was identified. This current proposal is now submitted under a more robust policy framework that places heightened emphasis on biodiversity, peatland conservation, landscape integrity, and community wellbeing.

The submission lacks a comprehensive and reliable evidential foundation necessary for a proper determination. Notable gaps exist in baseline data, the continued reliance on an unspecified design envelope, unclarified mitigation measures, and a failure to address significant impact pathways, including nocturnal wildlife, complete onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a clear understanding of the likely significant effects or any residual impacts.

Procedurally, there are evident failures present. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the failure to present the complete Social Impact Assessment represents a critical omission. Such deficiencies hinder the competent authority's ability to evaluate effects 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 illustrate adequate protection of biodiversity, natural areas, and cultural heritage. It fails to prove that health and wellbeing impacts are acceptable and does not demonstrate a net economic benefit due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been thoroughly evaluated, thus obscuring impacts on peatlands, carbon balance, habitats, and crofting land.

There remains a degree of uncertainty regarding environmental risks that could be significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also inconsistent in places. The evidential standard required to dismiss adverse effects beyond reasonable scientific doubt has not been satisfied, thus engaging the precautionary principle and obstructing a lawful conclusion regarding the acceptability of impacts.

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

Taken collectively, the application is both procedurally and substantively inadequate for determination. The extent of informational deficiencies, along with conflicts with policy and unresolved environmental risks, obstruct a lawful and evidence-based decision. The competent authority is compelled to either refuse consent based on these grounds or invoke appropriate regulatory measures to mandate the submission of the required information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 0315680F

Member of the public 1375

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

Dear Sir/Madam

This letter represents a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the marine licensing and Environmental Impact Assessment regimes. The development is situated off the west side of the Isle of Lewis, an area distinguished by its Atlantic-facing coastline and rich cultural identity. Concerns arise from the scale, proximity, and design of the wind farm, raising questions about its alignment with statutory requirements, national policy, and sustainable development principles.

A critical review of the Environmental Impact Assessment Report reveals that the application lacks an adequate evidential basis for a lawful determination. There is missing critical environmental data, and the baseline information provided is both limited and inconsistent. Additionally, key aspects of the proposal remain undefined, which hinders a clear understanding of its likely significant effects. The use of a flexible design framework complicates the assessment further, while the unspecified reliance on mitigation measures means their effectiveness cannot be evaluated. Consequently, the documentation fails to offer a comprehensive understanding of environmental, cultural, or community impacts, leaving claims of negligible or non-significant effects unsupported by robust evidence.

Substantive policy conflicts are evident. 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 demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests needed for consent and weaken the ability of the competent authority to determine the proposal's acceptability in policy terms.

The unprecedented scale of the proposal introduces large turbines in close proximity to the shoreline, raising significant concerns about landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. In light of these issues, it is essential to invoke the precautionary principle.

MARINE ECOLOGY AND PROTECTED SPECIES

The application demonstrates significant deficiencies in the assessment of marine ecology and protected species, particularly concerning its understanding of ecological receptors in the sensitive and biologically active environment of West Lewis coastal

waters. The methodologies employed are inadequate, leading to an incomplete baseline that fails to capture crucial details such as species presence, behaviour, and habitat use.

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

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity within the application is fundamentally flawed and does not recognise the West Lewis coastline as a dynamic cultural landscape. The intrinsic connections between environment, language, tradition, and community are overlooked, leading to a reductionist portrayal of heritage as a collection of isolated, static assets. This approach fails to acknowledge the

ongoing social, cultural, and spiritual functions that these elements serve within the community.

The assessment inadequately treats culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are active burial grounds and places of spiritual significance, yet they are mischaracterised as static features devoid of their continued relevance and the potential impacts of development on their surroundings. This lack of understanding leads to an incomplete evaluation of cultural effects and ignores the cemeteries' vital role in community life.

Intangible cultural heritage, including the Gaelic language, local traditions, and the deep-rooted relationship between the community and its coastal environment, is also neglected in the assessment. These aspects are central to the identity of the area, yet their omission signifies a serious gap in understanding the cultural ramifications of the proposed development.

Moreover, there are significant issues regarding community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity akin to that of Indigenous Peoples, yet the process of Free, Prior and Informed Consent has not been implemented. This lack of meaningful engagement raises serious concerns about the legitimacy of the assessment and fails to adhere to established participatory principles regarding decisions that affect cultural and environmental interests.

A critical procedural oversight is the failure to conduct a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. This assessment is essential for the competent authority to fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. The absence of this assessment alone renders the determination unlawful.

From a policy standpoint, the application’s deficiencies stand in stark contrast to National Planning Framework 4, particularly regarding the protection of historic assets and sites. The neglect of both tangible and intangible heritage, along with the disregard for living cultural practices, signifies a blatant departure from policy requirements.

In summary, the combined failures to assess living heritage, intangible cultural value, community rights, and adherence to statutory obligations culminate in a significant evidential gap. The cultural impacts of the proposed development remain inadequately assessed, and the application does not provide a reliable foundation for understanding the true cultural costs associated with it.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, seascape, and landscape is fundamentally flawed, failing to account for the scale of change and the sensitivity of the environment. The West Lewis coastline, characterised by its open Atlantic horizon, undeveloped nature, and profound sense of remoteness, would be irreversibly altered by the introduction of large-scale turbines near the shoreline. This would create a continuous industrial

presence that drastically transforms the area's character.

Moreover, the application inadequately conveys the extent of the visual change. Given their size and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations, thereby negatively affecting visual amenity and compromising the essential qualities of naturalness and remoteness. The assessment does not sufficiently articulate the significance of these impacts within the context of such a sensitive landscape.

Concerns also arise regarding the methodology employed 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 concerning key cultural heritage sites and high-value landscapes. This shortcoming raises the possibility that the visual impacts have been understated, compromising the reliability of the overall assessment.

Additionally, the failure to consider the interconnected relationship between landscape, seascape, and cultural heritage represents a further deficiency. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape linked by visual and spatial relationships to the Atlantic horizon. By treating these assets as isolated, the assessment overlooks their interdependence, resulting in an incomplete understanding of the impacts on their setting and cultural significance.

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

From a policy perspective, the proposal stands in direct conflict with National Planning Framework 4, particularly in terms of protecting natural places and historic assets. The scale of the proposed changes is incompatible with the imperative to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case assessment further diminishes any assertion of compliance with policy requirements.

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 both dominant and unavoidable. The resultant changes are thus fundamental and permanent, rather than reducible to an acceptable level through mitigation measures.

Collectively, these deficiencies illustrate that the assessment fails to accurately depict the scale of impact, the sensitivity of the environment, and the interrelatedness of landscape and heritage. Consequently, this undermines a reliable evaluation and reinforces the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal's assessment of construction and pollution risks is severely lacking, providing insufficient detail to evaluate the likely environmental effects. There is a significant degree of seabed preparation and installation work planned within a high-energy Atlantic environment. However, there are no developed Construction Environmental Management Plans or Pollution Prevention Plans included. Instead, the application depends on mitigation and contingency measures that are slated to be prepared after consent is granted, which hinders any meaningful evaluation of their adequacy or effectiveness.

This reliance on vague future measures raises serious concerns, particularly given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are at risk of sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it fails to provide adequate detail on how these risks will be prevented, controlled, or monitored.

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

The lack of detailed emergency response procedures only exacerbates these issues. By postponing contingency planning until after consent, the application obstructs the evaluation of whether appropriate safeguards are available to address potential pollution events. This adds procedural risk and undermines 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. It is critical that likely significant effects and mitigation strategies are assessed before consent is granted. The absence of this information means that a lawful determination cannot be achieved. Additionally, the application does not demonstrate compliance with relevant policy requirements regarding environmental protection and water quality.

Collectively, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts render the assessment materially deficient. 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 lacks a thorough evaluation of ecological and socio-economic impacts related to fisheries and marine life. Off the West Lewis coast, there exists both a diverse marine ecosystem and a functioning fishing industry. However, the proposal does not adequately demonstrate how these essential habitats and activities will be protected or maintained without significant disruption.

One of the critical flaws in the application is the assumption that fishing activity can be relocated without consequences. There is no evidence provided to suggest that alternative fishing grounds exist, are accessible, or can support the additional pressure that would result from such displacement. This oversight is crucial, as it poses a risk of overfishing in other areas, which could have broader economic ramifications for the local fishing fleet. Without a comprehensive and evidence-based assessment, the implications for fisheries and the livelihoods they support remain unclear.

Furthermore, the proposal poses considerable risks to marine species, particularly due to the underwater noise produced during construction. The use of high-energy hammer piling over an extended duration is expected to create disturbances across significant distances, potentially impacting species such as dolphins. The anticipated disturbance to a large portion of the local bottlenose dolphin population raises serious concerns, yet the application diminishes the importance of these effects and fails to provide adequate supporting evidence.

In the application, there is an evident inconsistency regarding the need for licences to permit harm to European Protected Species while simultaneously describing potential impacts as negligible. This contradiction calls into question the validity of the assessment and raises issues of compliance with the Habitats Regulations, especially where harm is expected to occur at a level that requires legal authorisation.

Additionally, the assessment does not account for cumulative impacts that may arise from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is necessary to determine the overall impact on marine ecosystems and socio-economic conditions.

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

Overall, the absence of evidence concerning fishing displacement, the minimisation of acoustic impacts, and the internal contradictions present in the application render the assessment incomplete and unreliable. These shortcomings hinder a thorough evaluation of the impacts on marine life and fisheries.

TOURISM

The proposal lacks a thorough assessment of tourism impacts, failing to consider the significant economic and social repercussions for a vital sector of the Isle of Lewis economy. Tourism, which has escalated from £65 million in 2017 to over £81.5 million, is crucial, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. The application recognises that 86% of visitors are attracted by the region's scenery; however, it does not provide a quantified analysis of how large-scale offshore infrastructure may influence visitor numbers, behaviour, or the overall economic contribution.

There is a notable oversight in evaluating how the industrialisation of the seascape and degradation of environmental quality could affect Tourism Gross Value Added and the resilience of the economy. Without such an analysis, it remains unclear whether the proposed development would yield a net economic benefit or harm an established and expanding sector. Additionally, the assessment neglects to examine the crucial role that environmental quality plays in tourism, specifically the value of unspoiled landscapes and dark skies to the visitor experience, as well as emerging markets like nature-based tourism and astro-tourism.

The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a significant void in understanding the implications for an increasingly important segment of the local economy. In a community with limited economic diversification, this oversight regarding tourism impacts bears wider consequences for employment, local enterprises, and community sustainability. The absence of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been evaluated as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application fails to establish adherence to National Planning Framework 4, particularly concerning economic impact and the necessity to demonstrate net benefit. It also contradicts strategic objectives that designate tourism as a key growth sector and does not supply adequate evidence for the competent authority to evaluate the economic implications of the proposal.

Overall, the failure to quantify tourism impacts, consider environmental influences on visitor behaviour, and acknowledge the island's economic dependence leads to a significant evidential gap. This hinders a thorough assessment of economic effects and supports 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 principles of sustainable development, as it fails to align with statutory duties, national policy, and evidential standards. This application revisits the core concerns that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was highlighted. The current proposal is put forward within a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

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

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

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

The environmental risks associated with the proposal remain uncertain and potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes contradictory. The evidential standard required to rule out adverse effects beyond reasonable scientific doubt has not been fulfilled, invoking the precautionary principle and precluding a lawful determination that impacts are acceptable.

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

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

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

Additional Comments

There must be other alternatives to this. It’s impact will be hugely negative for this quiet part of the country and for whose benefit?

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: 2ECD7A8A

Member of the public 1376

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 marine licensing and Environmental Impact Assessment. The objection arises from an examination of the Environmental Impact Assessment Report and other relevant documents, revealing serious deficiencies in planning, environmental considerations, cultural aspects, and procedural matters. The proposed development is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, nearly untouched environment, and rich cultural heritage. There are fundamental issues regarding the scale, design, and proximity of the proposal in relation to statutory requirements, national policy, and sustainable development principles.

The application does not present a sufficient evidential foundation for a lawful decision. There is a lack of critical environmental data, limited and inconsistent baseline information, and many aspects of the proposal remain undefined. The flexible design framework complicates the assessment of potential significant effects. Furthermore, the reliance on unspecified mitigation measures prevents an evaluation of their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, and the claims of negligible or non-significant effects lack robust evidence.

Substantive policy conflicts are evident. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, especially regarding biodiversity, natural areas, cultural heritage, and public health. It does not prove that it can meet national requirements to safeguard biodiversity, climate interests, and environmental integrity. These conflicts challenge the statutory tests necessary for consent and hinder the competent authority's ability to determine if the development aligns with policy requirements.

The proposal's scale is unprecedented for this area, with large turbines located near the shoreline, raising substantial concerns about landscape capacity, visual impact, and environmental repercussions. In light of the insufficient information, reliance on unclear mitigation strategies, evidential shortcomings, and clear policy non-compliance, it is apparent that the application is incomplete and does not support a lawful decision. Therefore, the precautionary principle should be applied in this case.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The reliance on a flexible Project Design Envelope, which lacks specific turbine dimensions, layouts, or configurations, introduces substantial uncertainty and compromises the integrity of the Environmental Impact Assessment Report. This

approach undermines the ability to apply a consistent worst-case scenario, leading to potential discrepancies between the presented impacts and those of the actual development. As a result, both the public and the competent authority are unable to comprehend the true extent of the environmental effects.

Furthermore, the application is heavily contingent upon mitigation measures, monitoring strategies, and management plans that are yet to be defined. Seeking consent under these conditions means that environmental harm would be addressed only at a later stage, hindering any thorough evaluation of effectiveness or residual impacts. This deferment of critical information to post-consent stages is procedurally unacceptable, contravening the fundamental purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly established before determination.

In addition, the assessment is fraught with evidential deficiencies, including notable gaps in baseline data and limitations in methodology, while relying on assumptions rather than site-specific evidence. This leads to uncertainty concerning the scale and significance of impacts, especially when conclusions regarding 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, resulting in scientific uncertainty that cannot satisfy statutory requirements.

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

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

ASSESSMENT OF ALTERNATIVES

The application lacks a robust assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Rather than offering a structured comparison of viable alternatives based on environmental effects, it presents a narrative account of project evolution. This method does not adequately demonstrate that less harmful options have been properly identified, assessed, and selected over more damaging solutions.

There is also a noticeable absence of a transparent or evidence-based comparison regarding alternative offshore locations, development scales, or design configurations.

Particularly, the application does not show that the developer has genuinely considered positioning the turbines further offshore, where the visual, ecological, and coastal impacts would likely be lessened. Given the sensitivity of the West Lewis coastline and the significant role that proximity to shore plays in determining impact, the lack of such analysis undermines any assertion that the proposed siting is the least damaging option.

The deficiencies are evident in the assessments of cable routing and landfall, where the evidence fails to show that alternative routes have been thoroughly explored to mitigate impacts on sensitive receptors. This includes locations of cultural and spiritual significance such as Barvas Cemetery. The omission of a clear avoidance strategy and the absence of comparative analysis indicate that there has been no application of mitigation by design, with reliance instead on post-design measures.

Consequently, the application does not prove that environmental harm has been minimised through site selection, layout, and infrastructure routing. This signifies a disregard for 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 is impossible to conclude that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this inadequacy undermines adherence to National Planning Framework 4, particularly concerning the protection of natural spaces, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment represents a material omission that ultimately supports the conclusion that the application has not been thoroughly assessed and cannot facilitate a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is significantly inadequate, failing to offer a complete or reliable understanding of the ecological receptors present. This area is characterised as a biologically active and highly sensitive marine system, yet the baseline data collected is insufficient, and the methodologies employed do not effectively capture species presence, behaviour, and habitat utilisation. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

A notable shortcoming is the treatment of otters, which are classified as a European Protected Species. The application does not adequately acknowledge or evaluate their active use of coastal zones for foraging and movement. The failure to consider their core foraging range and behavioural patterns leads to an incomplete assessment of the possible effects of construction disturbance, noise, and heightened activity, thereby undermining any conclusions that suggest no significant effects on this species.

In addition, the evaluation of basking sharks is flawed, as it relies on aerial surveys that introduce significant detection bias, especially under Atlantic weather conditions. This

methodology is prone to underestimating the presence of basking sharks, particularly when compared to established land-based observations that indicate their frequent usage of these waters. The neglect to incorporate or appropriately consider such data results in an incomplete baseline, further diminishing the reliability of the conclusions drawn.

The methodological shortcomings lead to conclusions regarding negligible or non-significant effects that rest on assumptions rather than substantial evidence. The lack of adequate baseline data also obstructs meaningful assessments of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation generates uncertainty concerning the true extent of risk posed to marine species and their habitats.

From a regulatory standpoint, the application does not satisfy the Environmental Impact Assessment requirements or those of National Planning Framework 4, as there has been insufficient identification or evaluation of protected species. The uncertainty introduced by these deficiencies means that adverse effects cannot be excluded beyond reasonable scientific doubt, thus necessitating the precautionary principle. Under these conditions, consent cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unfounded conclusions renders the assessment unreliable. These issues inhibit a thorough evaluation of impacts on marine ecology and protected species, supporting the overall assertion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, lacking the necessary evidence and containing numerous internal inconsistencies that undermine its findings. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already facing decline. However, the application fails to adequately demonstrate that these species will not be adversely affected. The proposed development is situated within critical foraging areas and migratory routes, yet the assessment does not thoroughly evaluate the risks associated with displacement, collision, or habitat loss.

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

Moreover, the assessment lacks sufficient evidence to ensure that seabirds linked to protected areas, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is inadequately addressed, and the reliance on modelling introduces uncertainty, especially concerning species that are in severe

decline, like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly where baseline data is insufficient and behavioural responses are not well understood.

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

Regulatory compliance is also in question, as the application does not meet the evidential standards required to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle and undermines a lawful conclusion in support of consent.

In summary, the identified deficiencies reflect a lack of adherence to National Planning Framework 4 concerning biodiversity protection and the preservation of natural assets. The failure to demonstrate that internationally important seabird populations will not be adversely affected places the proposal at odds with national policy. Collectively, these issues render the assessment unreliable, due to methodological weaknesses and insufficient evidence, ultimately leading to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

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

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

environmental interests.

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The failure to disclose the complete Social Impact Assessment raises significant concerns regarding the lawful evaluation of social impacts, health, and wellbeing. Although the developer engaged local residents through focus groups and commissioned a Social Impact Assessment, the absence of the full report results in a critical evidential gap. This lack of transparency denies both the public and the competent authority the ability to fully comprehend the social risks highlighted in the developer's own research.

Residents have already begun to experience measurable stress, anxiety, and concern due to the scale and proximity of the proposed development, as shown through direct engagement. These impacts are not speculative; however, the non-disclosure of the comprehensive assessment limits the capacity for proper scrutiny of the findings. As a result, the significance of these social impacts within the decision-making process remains undetermined.

Moreover, the proposal is viewed as a direct threat to the community's identity and cohesion, with concerns over "cultural loss" emerging from the developer's findings. Despite this recognition, the application fails to incorporate these impacts adequately or assign them appropriate weight. The withholding of the complete Social Impact Assessment obscures the true social and human costs associated with the development.

This lack of transparency severely undermines the Environmental Impact Assessment process. An extensive understanding of the social, economic, and health impacts is crucial for developments of such magnitude, especially where community character

and functioning may be at stake. By omitting the full dataset, the application lacks a comprehensive evidential basis to assess the balance between potential benefits and harms.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. It is imperative for developments to foster positive health outcomes while avoiding harm, yet the evidence available points to existing adverse effects that remain undisclosed. Without access to the complete assessment, it is impossible to confirm compliance with this essential policy.

The implications of these procedural shortcomings are profound. The competent authority is unable to conduct a robust socio-economic and health evaluation in the absence of the full Social Impact Assessment. This oversight constitutes a material omission within the application and fails to meet the evidential requirements dictated by the Environmental Impact Assessment framework.

In summary, the combination of the non-disclosure of the full Social Impact Assessment and the evidence of existing adverse impacts leads to an incomplete and unreliable evaluation. This circumstance obstructs a lawful determination and underscores that the application is not backed by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. The introduction of large-scale turbines in close proximity to the shoreline would result in a continuous and dominant industrial presence, fundamentally altering this character and leading to a permanent and irreversible transformation of the landscape. The assessment of seascape, landscape, and visual impacts is materially deficient, failing to adequately reflect the scale of change or the sensitivity of the receiving environment.

The proposal does not accurately represent the magnitude of visual change. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and eroding the defining qualities of naturalness and remoteness. The assessment inadequately conveys the significance of these impacts within such a sensitive landscape.

Methodological concerns arise regarding the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not fully encapsulate the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the risk that the magnitude of visual impact has been understated, undermining the assessment's reliability.

A critical deficiency exists in the failure to consider the interconnected relationship between landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting interlinked by visual and spatial relationships with the Atlantic horizon. The

assessment treats these heritage assets as isolated entities rather than recognising their interdependence, leading to an incomplete evaluation of impacts on their setting and cultural significance.

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks comprehensive detail regarding construction and pollution risks, failing to allow for a proper evaluation of potential environmental effects. It entails significant seabed preparation and installation works in a challenging Atlantic environment, yet fully developed Construction Environmental Management Plans and Pollution Prevention Plans are absent. Instead, the application depends on mitigation and contingency measures that are intended to be developed after consent has been granted, which hampers any meaningful assessment of their adequacy and effectiveness.

This dependence on undefined future measures raises serious concerns, particularly given the vulnerability of the receiving environment. The West Lewis coastline is home to clean coastal waters and critical habitats that could be harmed by sediment disturbance and contamination. Although the application identifies risks such as sediment mobilisation and potential chemical or oil spills, it fails to present adequate information on how these risks will be prevented, managed, or monitored.

There is significant uncertainty surrounding the scale and behaviour of sediment plumes resulting from the disturbance of the seabed and cable installation. Without thorough modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological repercussions of these impacts. This

uncertainty also applies to the potential effects on marine species and habitats identified as sensitive in the broader assessment.

Furthermore, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application obstructs the evaluation of whether sufficient safeguards are established to address pollution incidents. This introduces procedural risks and undermines the capacity of the competent authority to appraise environmental protection measures at the decision-making stage.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. It is imperative that significant effects and mitigation measures be assessed prior to granting consent, and the absence of such information renders a lawful determination impossible. The application also fails to showcase adherence to policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The evaluation of the potential impacts on marine life and fisheries is inadequate and lacks a thorough assessment of both ecological and socio-economic effects. The fishing industry is active in the waters off the West Lewis coast, which also hosts a diverse marine ecosystem. However, the application does not sufficiently demonstrate that these activities and habitats can be safeguarded from significant disruption.

A major concern is the assumption that fishing activities can be moved without repercussions. The application does not provide evidence that alternative fishing locations are available, accessible, or able to handle increased pressure. This is a critical gap, as displacing fishing efforts risks overfishing in other areas and could lead to broader economic challenges for the local fishing fleet. Without a clear, evidence-based evaluation, the consequences for fisheries and local livelihoods remain unclear.

The proposal poses notable risks to marine species, particularly due to the underwater noise produced during construction. The extended use of high-energy hammer piling is expected to create disturbances over considerable distances, potentially affecting marine mammals such as dolphins. There are serious worries regarding the predicted disruption to a significant segment of the local bottlenose dolphin population, yet the application diminishes the importance of these effects without sufficient evidence.

The application also exhibits a clear contradiction by recognising the necessity for licences to allow harm to European Protected Species while simultaneously claiming

that the impacts are negligible. This inconsistency damages the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially where anticipated harm necessitates legal approval.

Furthermore, the assessment neglects to consider the cumulative impacts resulting from various pressures, such as habitat disruption, noise, and fishing displacement. Without a thorough examination of these combined effects, it is impossible to determine the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not demonstrate alignment with the National Planning Framework 4 or the National Marine Plan. It fails to illustrate that the development can operate alongside existing marine users or prevent unacceptable harm to marine biodiversity, which obstructs any conclusion regarding the proposal's sustainability.

Overall, the deficiencies in evidence concerning fishing displacement, the underestimation of acoustic impacts, and the internal contradictions lead to an incomplete and unreliable assessment. These issues hinder a proper evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is significantly inadequate and does not take into account the full range of impacts resulting from what constitutes a single integrated project. The offshore turbines and the onshore works are inherently linked; however, they are evaluated separately. This results in a disjointed approach that conceals the actual magnitude of the environmental and socio-economic consequences.

Included in the onshore components are cabling across protected moorland, the construction of a substation near Stornoway, and related access infrastructure traversing sensitive landscapes. These activities necessitate excavation in areas of deep peat, particularly within Barvas Moor, an important carbon store and ecologically delicate habitat. The application fails to deliver a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

The exclusion or postponement of the assessment of onshore impacts impedes a proper evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all parts of a project must be considered collectively; nevertheless, the division of offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities remain poorly understood.

There are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected under policy. The application does not indicate that the impacts on these habitats have been fully evaluated or that suitable avoidance measures have been implemented, resulting in a clear evidential gap

concerning biodiversity protection.

Concerns regarding carbon balance are also raised by the proposal. Disturbance of peatland releases stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy initiatives. The application does not sufficiently tackle this matter or demonstrate that the overall carbon balance is beneficial.

Furthermore, the routing of infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. The application lacks evidence 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 inability to assess the project as a cohesive whole and demonstrate the protection of peatlands, habitats, and land use interests is at odds with the National Marine Plan and National Planning Framework 4. The failure to prove that impacts can be avoided or mitigated further weakens the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment concerning dark skies and nocturnal wildlife represents a significant failure within the Environmental Impact Assessment. The West Lewis coastline is noted for its exceptionally dark skies, which are crucial for environmental quality, cultural identity, and tourism, particularly in emerging sectors like astro-tourism. The proposal suggests the introduction of permanent red aviation lighting that will be visible over extensive distances, creating a continuous and disruptive "wall of light" effect across the western horizon, which would drastically change the night-time environment.

Furthermore, the application lacks an evaluation of the impact that this lighting will have on visual amenity, landscape character, and the experiences of both residents and visitors. This gap is critical, considering the vital role dark skies play in the region’s identity. The failure to assess these implications leads to an incomplete landscape and environmental evaluation.

More alarmingly, the proposal does not address the potential impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly vulnerable to artificial lighting, which can cause disorientation and a higher risk of collisions. Without a lighting impact assessment or phototaxis study, there is no analysis regarding how the introduction of aviation lighting may affect these birds or increase their mortality rates.

This gap in assessment is further exacerbated by the reliance on daytime survey data

within the ornithological evaluation, which does not account for nocturnal activity or the associated risks. Kittiwakes, for instance, may forage or migrate at night and are susceptible to disorientation from artificial lighting; however, this risk has not been evaluated. The lack of site-specific night-time data constitutes a critical shortcoming in understanding the ecological impacts.

In the absence of an assessment focused on nocturnal effects, it is impossible to ascertain whether protected species or designated sites will face adverse impacts. The necessary evidential standard to exclude potential adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and preventing a lawful determination.

From a policy standpoint, this oversight contradicts National Planning Framework 4, particularly regarding the safeguarding of natural areas and environmental quality. Additionally, it compromises the wider evaluation of landscape and seascape impacts, as the character of night-time environments is integral to the overall ecosystem.

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

TOURISM

The proposal does not adequately assess the impacts on tourism, which is a vital sector for the Isle of Lewis. Tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. Although the application acknowledges that 86% of visitors are attracted by the scenery, it lacks a quantified evaluation of how large-scale offshore infrastructure might influence visitor numbers, their behaviour, or the overall economic contribution to the area.

Tourism has seen 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 fails to model the potential effects of the industrialisation of the seascape and the resulting loss of environmental quality on Tourism Gross Value Added and the broader economic resilience. Without such analysis, it is impossible to ascertain whether the development would provide a net economic benefit or detract from an established and expanding sector.

Additionally, the assessment does not take into account the crucial role of environmental quality in tourism. The significance of unspoiled landscapes and dark skies is essential for visitor experiences and emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further highlights this shortfall, resulting in a notable absence of understanding regarding the impacts on a recognised and growing aspect of the local economy.

In an island community that has limited economic diversification, not evaluating the

tourism impacts has broader implications for employment, local businesses, and community sustainability. The omission of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been analysed as required under the Islands (Scotland) Act 2018.

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

Overall, the lack of quantification regarding tourism impacts, the absence of an assessment of the environmental factors influencing visitor behaviour, and the disregard for the island's economic dependencies create a significant gap in evidence. This undermines a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates significant shortcomings in meeting the criteria for sustainable development as outlined by statutory obligations, national policy, and evidential standards. It mirrors the fundamental issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the extent of industrialisation. This current application, however, is put forth under a supposedly stronger policy framework that places additional emphasis on biodiversity, peatland conservation, landscape integrity, and community wellbeing.

There exists a lack of a complete and reliable evidential basis for decision-making. Gaps in baseline data persist, and there is reliance on an undefined design envelope alongside unspecified mitigation measures. Furthermore, there are notable omissions regarding key impact pathways, specifically concerning nocturnal wildlife, comprehensive onshore infrastructure, and effects on tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a full understanding of potential significant effects or residual impacts.

Procedural inadequacies are also evident. The failure to produce a compliant Island Communities Impact Assessment breaches statutory duties outlined in the Islands (Scotland) Act 2018, while the incomplete disclosure of the Social Impact Assessment constitutes a material omission. Such deficiencies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Conflicts arise with National Planning Framework 4, as the proposal does not adequately protect biodiversity, natural places, and cultural heritage. It also fails to demonstrate acceptable health and wellbeing impacts and lacks evidence of net economic benefit due to the absence of tourism impact modelling. Furthermore, the

cumulative effects of both offshore and onshore elements have not been properly evaluated, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain ambiguous and potentially severe. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent internally. The necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and obstructing a lawful determination of acceptable impacts.

The proposal poses a risk of substantial and irreversible alteration to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual relationships, and detrimental effects on tourism lead to permanent impacts that cannot be sufficiently mitigated.

In summary, the application is fundamentally flawed both procedurally and substantively. The magnitude of information deficiencies, along with conflicts with policy and unresolved environmental risks, obstructs a lawful, evidence-based decision. Therefore, it is imperative that the competent authority either refuse consent based on these grounds or invoke the appropriate regulatory provisions to require the submission of the missing information.

For these reasons, a formal request is made for the refusal of the Spiorad na Mara Offshore Wind Farm application 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: 90E76054

Member of the public 1377

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the proposed Spiorad na Mara Offshore Wind Farm, which has been submitted for consideration under relevant marine licensing and Environmental Impact Assessment frameworks. Our objection arises from a thorough examination of the Environmental Impact Assessment Report and associated documents, revealing significant planning, environmental, cultural, and procedural deficiencies. The site is located off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns have been raised regarding the compatibility of the scale, proximity, and design of the project with statutory requirements, national policy, and sustainable development principles.

The application lacks an adequate evidential basis for lawful determination. There is a concerning absence of critical environmental data, and the baseline information provided is both limited and inconsistent, leaving several key aspects of the proposal undefined. The proposed use of a flexible design framework hampers a clear assessment of potential significant effects, while the reliance on unspecified mitigation measures makes it impossible to evaluate their potential effectiveness. Consequently, the documentation fails to facilitate a comprehensive understanding of environmental, cultural, or community impacts, leaving claims of negligible or non-significant effects unsupported by robust evidence.

Substantial policy conflicts have been identified. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate that it can meet national obligations for protecting biodiversity, climate interests, and environmental integrity. These conflicts directly challenge the statutory tests required for consent and diminish the capacity of the competent authority to determine that the project meets policy standards.

The scale of the proposed development is unprecedented for this area, with large turbines positioned dangerously close to the shoreline. This raises critical issues regarding landscape capacity, visual dominance, and environmental impact. The cumulative effect of insufficient information, reliance on undefined mitigation measures, evidential deficiencies, and evident policy non-compliance underscores that the application is incomplete and cannot support a lawful determination. In light of these findings, 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 comprehensive, clear, or trustworthy account of the anticipated environmental consequences of the proposal. The implementation of a flexible Project Design Envelope, which does not commit to precise turbine dimensions, layouts, or configurations, introduces considerable uncertainty and hinders a consistent evaluation of a worst-case scenario. This lack of clarity undermines the assessment's credibility, preventing both the public and the competent authority from grasping the true scale of environmental impacts.

Furthermore, the application significantly depends on unformulated mitigation measures, monitoring strategies, and management plans. Seeking consent under the premise that environmental damage will be addressed later restricts any substantial appraisal of effectiveness or evaluation of residual impacts. This postponement of essential information to post-consent stages is procedurally inappropriate and contradicts the objectives of the Environmental Impact Assessment framework, which mandates that likely significant effects and mitigations are clearly defined prior to decision-making.

Moreover, the assessment contains notable evidential shortcomings, such as insufficient baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the magnitude and significance of impacts, particularly in instances where negligible or non-significant effects are concluded without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, thereby introducing scientific uncertainties that fail to meet statutory obligations.

Consequently, the application does not satisfy the evidential standards 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 does not adequately demonstrate compliance with National Planning Framework 4, including stipulations related to biodiversity protection and environmental integrity, as it is unclear whether impacts have been thoroughly assessed or if suitable safeguards exist.

In summary, the reliance on an unspecified design envelope, the absence of clearly defined mitigation measures, and the deficiencies in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings preclude a lawful and rigorous evaluation of environmental effects, placing the competent authority in a position where it cannot adequately assess the application based on the information provided.

ASSESSMENT OF ALTERNATIVES

The proposal presents significant shortcomings in its assessment of alternatives, failing to meet the necessary standards set by the Environmental Impact Assessment regime. The application does not offer a coherent or evidence-based evaluation of realistic alternatives, neglecting to provide a structured comparison based on environmental

impacts. Instead, it merely recounts the evolution of the project, which does not adequately demonstrate that less harmful options have been properly identified, assessed, and favoured over more damaging solutions.

Moreover, there is a troubling lack of transparent analysis regarding alternative offshore locations, development scales, or design configurations. The application does not convincingly establish that the developer has considered the possibility of siting turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be less severe. Given the sensitivity of the West Lewis coastline and the critical role that proximity to shore plays in determining impacts, the absence of such an analysis prevents any conclusion that the chosen siting is the least damaging option available.

This inadequacy extends to the assessment of cable routing and landfall, where there is a lack of evidence demonstrating that alternative routes have been thoroughly explored to reduce impacts on sensitive receptors, including culturally and spiritually significant sites like Barvas Cemetery. The failure to outline a clear avoidance strategy or conduct a comparative analysis suggests that the application has not adopted mitigation by design, instead relying on post-design measures that may not sufficiently address potential harm.

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

From a policy standpoint, these deficiencies undermine compliance with National Planning Framework 4, particularly concerning the protection of natural places, cultural heritage, and community wellbeing. The lack of a systematic and comparative assessment is a significant omission that leads to the overall conclusion that the application has not been adequately evaluated, and thus cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species exhibits significant deficiencies, leading to an incomplete and unreliable understanding of the ecological receptors within the West Lewis coastal environment. This area is a biologically active and highly sensitive marine system, yet the baseline data presented is inadequate, and the methodologies employed fail to capture essential details regarding species presence, behaviour, and habitat use. Consequently, the assessment lacks a solid evidential foundation for evaluating potential impacts.

A critical shortcoming is evident in the treatment of otters, a species protected under European law. The application does not sufficiently acknowledge or assess their active

use of coastal regions for foraging and movement. The oversight 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. This omission significantly undermines any conclusions drawn about the absence of substantial effects on this species.

Additionally, the evaluation of basking sharks is flawed due to an over-reliance on aerial surveys, which introduces considerable detection bias, particularly under Atlantic conditions. This method is likely to lead to an underestimation of the species' presence, especially when compared to well-documented land-based observations that indicate frequent utilisation of these waters. The failure to include or adequately consider such data results in an incomplete baseline, further weakening the credibility of the conclusions reached.

The methodological inadequacies indicate that any conclusions regarding negligible or non-significant effects rest on assumptions rather than solid evidence. The lack of comprehensive baseline data hinders the meaningful assessment of cumulative and indirect impacts, encompassing seasonal variations and broader ecosystem interactions. This generates uncertainty about the actual level of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set out by the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. This uncertainty introduces challenges in excluding adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these circumstances, the granting of consent cannot be legally justified.

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, leading to the overall conclusion that the application is devoid of a sufficient evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally significant seabird populations, many of which are already experiencing decline. The ornithological assessment related to the application is fundamentally flawed, containing significant gaps in evidence and internal contradictions that undermine its conclusions. The development is situated within key foraging areas and migratory pathways, yet the assessment fails to robustly evaluate the implications of displacement, collision risk, or habitat loss for these species.

A key contradiction exists in the application, where the developer asserts no significant adverse effects, while also pursuing a Habitats Regulations derogation case, which is typically only necessary when significant harm is anticipated. This inconsistency raises doubts regarding the reliability of the assessment and suggests that the conclusions

drawn are not underpinned by adequate evidence. Furthermore, the assessment does not sufficiently establish 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 comprehensively addressed, and the reliance on modelling methods introduces uncertainty, particularly concerning species in severe decline, such as Kittiwakes and Fulmars. The methodologies employed likely underestimate mortality rates, especially given incomplete baseline data and the lack of understanding of behavioural responses.

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

From a regulatory standpoint, the application fails to meet the evidential threshold required to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, combined with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation engages the precautionary principle, thereby preventing a lawful conclusion in support of consent. Moreover, the identified deficiencies represent a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal at odds with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is a 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 non-disclosure of the full Social Impact Assessment is a critical failure that compromises the integrity of the application. The competent authority cannot conduct a thorough socio-economic and health evaluation without this essential information, resulting in a material omission that undermines the evidential requirements set by the Environmental Impact Assessment regime.

Available summaries suggest that residents are already facing significant stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts stem from direct engagement with local residents and are not mere speculation. However, the lack of access to the full assessment hinders appropriate scrutiny of these findings, thereby limiting the ability to assess their significance in the decision-making process.

Additionally, evidence indicates that the proposal poses a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's own research. Despite this, such impacts have not been adequately incorporated into the main application or

considered with the seriousness they warrant. The failure to disclose the complete Social Impact Assessment obscures the true human and social costs associated with the development.

This transparency issue also undermines the Environmental Impact Assessment process, as a comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly when they may affect community character and functionality. The application does not provide a complete evidential basis for evaluating the balance between benefits and harm.

From a policy standpoint, the application falls short of demonstrating alignment with National Planning Framework 4 concerning health and wellbeing. Development should facilitate positive health outcomes and mitigate harm, yet the existing evidence points to adverse effects that have not been fully disclosed. Without the complete assessment, it is impossible to prove compliance with this policy.

In summary, the deficiencies stemming from the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing adverse impacts, culminate in an incomplete and unreliable evaluation. This situation precludes a lawful determination and reinforces the assertion 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 profound sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the shoreline threatens to create a continuous industrial presence that would fundamentally change this character, resulting in a permanent and irreversible transformation of the landscape.

The application does not accurately represent the extent of visual change that would occur. The scale and proximity of the turbines are such that they would dominate views from residential areas, historic sites, and frequently visited coastal locations. This dominance would directly impact visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment fails to adequately communicate the significance of this impact within the context of such a sensitive environment.

Methodological issues are also evident in the selection and presentation of visual viewpoints. It appears that the viewpoints included may not comprehensively represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the concern that the magnitude of visual impact has been understated, thereby compromising the reliability of the assessment.

Moreover, there is a notable deficiency in addressing the interconnected relationship between landscape, seascape, and cultural heritage. Important sites, including the Calanais Standing Stones and other Scheduled Monuments, form part of a larger

landscape setting that is visually and spatially linked to the Atlantic horizon. The assessment considers these assets in isolation, failing to acknowledge their interdependence, which results in an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are perceived and severing their relationship with the natural horizon. This represents not merely a visual impact but also a broader cultural and spatial harm that has not been properly assessed in the application.

From a policy standpoint, the proposal contravenes National Planning Framework 4 in terms of safeguarding natural places and historic assets. The magnitude of change proposed is incompatible with the need to protect landscape character, visual amenity, and the setting of culturally significant sites. The lack of a comprehensive worst-case assessment further undermines any assertion of policy compliance.

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

Collectively, these deficiencies in the assessment prevent an accurate representation of the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. This reinforces the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of the potential environmental effects related to construction and pollution is inadequate, lacking the detail necessary for a comprehensive evaluation. The proposal entails extensive seabed preparation and installation works in a high-energy Atlantic environment, yet it fails to provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on unspecified mitigation and contingency measures to be created after consent, which hinders any meaningful assessment of their sufficiency or effectiveness.

Given the sensitivity of the receiving environment, this dependence on undefined future measures raises significant concerns. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. While the application recognises risks such as sediment mobilisation and accidental chemical or oil spills, it does not adequately outline how these risks will be prevented, controlled, or monitored.

Uncertainty persists regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and well-

defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also encompasses potential effects on marine species and habitats that have already been identified as sensitive within the broader assessment.

Moreover, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application obstructs the evaluation of whether appropriate measures are in place to address pollution events. This situation introduces procedural risks and undermines the capacity of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the delay in establishing critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation measures must be evaluated before consent is granted, and the absence of such information means that a lawful determination cannot be achieved. Furthermore, the application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, inadequate management plans, and uncertainty regarding potential impacts result in a materially deficient assessment. These deficiencies hinder a thorough evaluation of construction and pollution risks and further substantiate the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application lacks a comprehensive assessment of the socio-economic and ecological impacts on 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 proposal fails to adequately demonstrate that these vital habitats and uses can be preserved or maintained without causing significant disruption.

A critical concern is the presumption that fishing activities can be relocated without repercussions. The application does not provide sufficient evidence that alternative fishing grounds exist, are accessible, or can sustain the additional fishing pressure. This significant oversight risks contributing to overfishing in other areas and could have broader economic ramifications for the local fishing fleet. The lack of a thorough and evidence-based assessment means that the impacts on fisheries and the livelihoods dependent on them remain poorly understood.

Moreover, the proposal poses considerable risks to marine species, particularly from the underwater noise created during construction activities. The anticipated high-energy hammer piling over an extended duration is expected to disturb marine life over substantial distances, affecting species such as dolphins. The projected disturbance to a large portion of the local bottlenose dolphin population raises serious concerns, yet the application minimizes these potential effects without adequate supporting evidence.

There exists an evident inconsistency within the application, as it acknowledges the necessity for licences to allow harm to European Protected Species while simultaneously characterising the impacts as negligible. This contradiction calls into question the reliability of the assessment and raises significant concerns regarding compliance with the Habitats Regulations, particularly when potential harm necessitates legal authorisation.

Additionally, the assessment overlooks the cumulative impacts stemming from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. A thorough evaluation of these combined effects is essential to ascertain the overall impact on marine ecosystems and the socio-economic landscape.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

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

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

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

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

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

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

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

TOURISM

The failure to assess the implications of the proposed development on tourism represents a significant oversight, given the economic dependency of the Isle of Lewis on this sector. Tourism has increased notably, with its contribution rising from £65 million in 2017 to over £81.5 million, thereby supporting more than 1,000 jobs and accounting for up to 16% of the local economy. The absence of a thorough analysis regarding how large-scale offshore infrastructure might alter visitor numbers and behaviours hinders an accurate understanding of the potential impacts on economic contribution.

Tourism thrives on the area's wild coastline, near-pristine landscapes, and dark skies, all of which provide a unique visitor experience. The application acknowledges that 86% of tourists are attracted by the scenery, yet it does not offer a quantified assessment of how the industrialisation of the seascape could detract from these vital attractions. The lack of consideration for environmental quality, particularly concerning unspoiled landscapes and dark skies, further complicates the evaluation of the tourism sector's potential decline.

Moreover, the failure to incorporate a Dark Skies Assessment leaves a critical gap in

understanding the effects on nature-based and astro-tourism, both of which are emerging markets that could significantly benefit the local economy. In an island community where economic diversification is limited, this lack of assessment has broader ramifications for employment, local businesses, and community sustainability.

The submission also falls short in meeting policy requirements, failing to demonstrate adherence to the National Planning Framework 4 regarding economic impacts and the necessity to show net benefit. It conflicts with strategic objectives that prioritise tourism as a growth sector and lacks sufficient evidence for the competent authority to evaluate the economic consequences of the proposal adequately.

Taken collectively, the deficiencies in quantifying tourism impacts, assessing the environmental drivers of visitor behaviour, and recognising the economic vulnerabilities of the island culminate in a significant evidential gap. This situation precludes a thorough evaluation of the economic effects and suggests 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. This application echoes the key issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. Despite being presented under a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application lacks a comprehensive evidential basis for evaluation.

Critical gaps in baseline data are apparent, alongside the use of an undefined design envelope. The reliance on unspecified mitigation measures and the omission of vital impact pathways, such as nocturnal wildlife, full onshore infrastructure, and tourism effects, render the Environmental Impact Assessment incomplete. This deficiency hinders a full understanding of potential significant effects and residual impacts.

Procedurally, the proposal suffers from clear failures. The lack of a compliant Island Communities Impact Assessment breaches the statutory duty outlined in the Islands (Scotland) Act 2018, while the failure to provide the complete Social Impact Assessment represents a significant omission. Such shortcomings obstruct the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

In direct conflict with National Planning Framework 4, the proposal does not protect biodiversity, natural places, or cultural heritage. It fails to demonstrate acceptable health and wellbeing impacts and cannot evidence a net economic benefit due to the absence of tourism impact modelling. The cumulative impacts of both offshore and onshore components have not been adequately assessed, obscuring their effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks posed by the proposal remain uncertain and potentially significant. Incomplete assessments regarding marine ecology, seabirds, protected species, and marine mammals, as well as inconsistencies within those assessments, mean that the evidential standard required to rule out adverse effects has not been achieved. This situation activates the precautionary principle, precluding a lawful conclusion about the acceptability of impacts.

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

Considering all these factors, the application is both procedurally and substantively unfit for determination. The extensive deficiencies in information, alongside conflicts with policy and unresolved environmental risks, obstruct a lawful and evidence-based decision. Therefore, it is requested that consent for the Spiorad na Mara Offshore Wind Farm application be refused in its entirety.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 1E86E89E

Member of the public 1378

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

Dear Sir/Madam

This representation constitutes a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The application is located off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline and a near-pristine environment that reflects a strong cultural identity. However, the proposal raises fundamental concerns about its compatibility with statutory requirements, national policy, and the principles of sustainable development due to its scale, proximity, and design.

A review of the Environmental Impact Assessment Report and supporting documentation reveals critical deficiencies. The application lacks an adequate evidential basis for a lawful determination, as critical environmental data is missing, baseline information is both limited and inconsistent, and significant aspects of the proposal remain undefined. The use of a flexible design framework further complicates the ability to assess likely significant effects, while the reliance on unspecified mitigation measures means their effectiveness cannot be evaluated. Consequently, the documentation fails to facilitate a comprehensive understanding of the potential environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by robust evidence.

Moreover, there are substantive policy conflicts associated with the proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly affect the statutory tests for consent and impair the ability of the competent authority to conclude that the development is acceptable in policy terms.

The unprecedented scale of the proposal in this location, with large turbines positioned near the shoreline, raises significant concerns regarding landscape capacity, visual dominance, and overall environmental impact. Collectively, the lack of sufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and inadequate for supporting a lawful determination. In light of these issues, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a comprehensive, transparent, or reliable evaluation of the potential environmental impacts associated with the proposal. The introduction of a flexible Project Design Envelope, lacking a commitment to specific turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This ambiguity hinders a consistent application of a worst-case scenario, thereby compromising the integrity of the assessment. As a result, the impacts detailed may not accurately represent the development that is ultimately realised, obstructing both public understanding and that of the competent authority regarding the true extent of environmental consequences.

Furthermore, the application places substantial reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent based on the premise that any environmental harm will be rectified at a later stage precludes a meaningful evaluation of the effectiveness of such measures or an assessment of residual impacts. This postponement of critical information to post-consent phases is procedurally inappropriate and contradicts the core objectives of the Environmental Impact Assessment framework, which mandates that likely significant effects and mitigations be clearly established before a determination is made.

There exist notable evidential deficiencies as well, encompassing gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This leads to uncertainty about the scale and significance of impacts, particularly when conclusions regarding negligible or non-significant effects are offered without solid supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that is incompatible with statutory requirements.

Consequently, the application does not meet the evidential threshold mandated by the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This necessitates the precautionary principle's application, especially regarding protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it cannot be established that impacts have been comprehensively assessed or that appropriate safeguards are present.

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

ASSESSMENT OF ALTERNATIVES

The application lacks a comprehensive assessment of alternatives, which does not satisfy the statutory requirements of the Environmental Impact Assessment regime.

Instead of offering a structured and reasoned comparison of realistic alternatives based on environmental impacts, it provides a narrative detailing the project's evolution. This method fails to demonstrate that less harmful options have been sufficiently identified, evaluated, and chosen over more damaging solutions.

There is a notable absence of transparent, evidence-based comparisons concerning alternative offshore locations, development scales, or design configurations. Specifically, the application does not indicate that the developer has adequately considered positioning turbines further offshore, which could potentially reduce visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline and the crucial role that proximity to the shore plays in determining impacts, the lack of such analysis prevents any determination that the proposed siting is the least damaging option.

These shortcomings extend to the cable routing and landfall assessment, where there is inadequate evidence that alternative routes have been thoroughly examined to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas 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 employed, resulting in a reliance on post-design mitigation measures instead.

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 and hampers the competent authority's ability to ascertain whether more appropriate and less harmful alternatives are available. In the absence of a robust assessment of alternatives, it cannot be concluded that the proposal is a sustainable or policy-compliant solution.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment regarding marine ecology and protected species is significantly inadequate, failing to provide a thorough and trustworthy understanding of ecological receptors in the West Lewis coastal environment. This region is characterised by its sensitivity and biological activity, yet the methodologies used lack the ability to fully capture species presence, behaviours, and habitat usage, leading to an incomplete baseline data set. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

Notably, the assessment neglects to adequately identify and evaluate otters, which are

classified as a European Protected Species. The application does not recognise their active utilisation of coastal areas for foraging and movement. The failure to consider their core foraging range and behavioural patterns leads to a significant oversight in assessing the potential effects of construction-related disturbances, noise, and increased activity. This omission undermines the conclusions drawn regarding the absence of significant effects on otters.

Additionally, the evaluation of basking sharks is problematic, as it relies heavily on aerial surveys that introduce notable detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence, especially in comparison to established land-based observations that indicate their frequent use of these waters. The failure to integrate or adequately consider such data results in a deficient baseline and diminishes the reliability of the conclusions reached.

Due to these methodological shortcomings, the conclusions asserting negligible or non-significant effects are based on assumptions rather than robust evidence. The lack of adequate baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty about the actual scale of risks to marine species and habitats.

From a regulatory standpoint, the application does not adhere to the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, granting consent cannot be justified under the law.

In summary, the presence of incomplete baseline data, flawed methodologies, and unsupported conclusions collectively render the assessment unreliable. These inadequacies obstruct a thorough evaluation of impacts on marine ecology and protected species, leading to the overarching conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment contains significant gaps in evidence and internal inconsistencies, which undermine its conclusions. The application fails to meet the evidential threshold required to demonstrate that internationally important seabird populations on the west coast of the Isle of Lewis will not be adversely affected. This area supports many seabird species that are already in decline. The development is situated within key foraging areas and migratory pathways, yet the assessment does not adequately evaluate displacement, collision risk, or habitat loss.

There is a fundamental contradiction in the application. The developer concludes that there are no significant adverse effects, while also advancing a Habitats Regulations derogation case, which is required only when significant harm is anticipated. This inconsistency raises questions about the reliability of the assessment and suggests

that the conclusions presented lack support from the evidence. The assessment fails to provide sufficient proof that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not thoroughly considered, and the reliance on modelling techniques introduces uncertainty, especially for species in severe decline like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, particularly in light of incomplete baseline data and insufficient understanding of behavioural responses.

The siting of turbines within a recognised migratory corridor poses an additional risk by potentially creating a barrier in a primary flight path utilised by species travelling between the United Kingdom and Iceland. The application does not adequately assess the long-term implications of sustained mortality in this corridor or the potential effects on species with relatively small global populations.

From a regulatory viewpoint, the presence of contradictory conclusions, data gaps, and limitations in modelling means that the standard of beyond reasonable scientific doubt has not been achieved. This situation engages the precautionary principle, preventing a lawful conclusion that supports consent. Furthermore, the identified deficiencies demonstrate a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to show that internationally important seabird populations will not be adversely affected places the proposal at odds with national policy.

Overall, the assessment is unreliable due to these internal inconsistencies, methodological weaknesses, and insufficient evidence. These shortcomings hinder a robust evaluation of impacts and contribute to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline should be recognised as a living cultural landscape where environment, language, tradition, and community are interwoven. However, the assessment of cultural heritage and community identity is fundamentally inadequate. It adopts a reductive approach by treating heritage as isolated, static assets, ignoring their ongoing social, cultural, and spiritual functions within the community.

Culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are active places of burial and spiritual practice. Nonetheless, these locations have been mischaracterised as static features, with the assessment failing to consider their continued use and the development's impact on their settings. This oversight leads to an incomplete evaluation of cultural effects and neglects their importance in community life.

Moreover, the assessment disregards intangible cultural heritage, including the Gaelic language and traditions, along with the long-standing relationship between the community and the coastal environment. These elements are vital to the area's identity

but are entirely omitted from the evaluation, representing a significant gap. Without incorporating these factors, the true cultural impact of the development cannot be adequately understood.

The absence of meaningful engagement with the Gaelic-speaking population, who possess a distinct cultural identity and characteristics of an Indigenous People, raises serious concerns about community rights. No process of Free, Prior and Informed Consent has been undertaken, undermining the legitimacy of the assessment and violating established principles of participation regarding decisions that affect cultural and environmental interests.

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

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

Collectively, these failures to assess living heritage, intangible cultural value, community rights, and statutory obligations lead to a significant evidential gap. The cultural impacts of the development have not been properly evaluated, and the application lacks a sufficient foundation for determining the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The failure to publish the full Social Impact Assessment represents a significant evidential gap that undermines the application. The assessment, commissioned by the developer and including focus groups with local residents, has not been made available. Consequently, both the public and the competent authority are deprived of the opportunity to fully understand the social risks identified through the developer's own research. Available summaries highlight that residents are currently facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts stem from direct engagement and are not speculative. However, without access to the complete assessment, proper scrutiny of the findings is not possible, which hinders the ability to assess their significance in the decision-making process.

Furthermore, the application has not adequately addressed evidence suggesting that the proposal threatens community identity and cohesion. The developer's own findings have identified "cultural loss," yet these concerns have not been fully integrated into the main application or given the appropriate weight they warrant. The withholding of the full Social Impact Assessment obscures the true human and social cost of the

development.

This lack of transparency also affects the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is essential for developments of this nature, especially when community character and functioning may be at risk. The failure to provide the complete dataset means the application does not offer a thorough evidential basis for weighing benefits against harm.

From a policy perspective, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Developments are required to support positive health outcomes and avoid harm, yet the evidence available indicates existing adverse effects that remain undisclosed. Without the full assessment, it is impossible to prove compliance with this policy.

The procedural implications of this omission are serious. 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 and a failure to meet the evidential standards required under the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon and undeveloped nature, contributing to a strong sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the shoreline would create a continuous industrial presence that fundamentally alters this character, resulting in a permanent and irreversible transformation of the landscape. The assessment of seascape, landscape, and visual impacts is materially deficient, as it fails to adequately reflect the scale of change or the sensitivity of the receiving environment.

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

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

assessment.

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

From a policy perspective, the proposal directly conflicts with National Planning Framework 4 regarding the protection of natural places and historic assets. The scale of change is incompatible with the requirement to safeguard landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the absence of a robust worst-case assessment undermines any claims of policy compliance.

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal presents significant deficiencies in its assessment of construction and pollution risks, which are essential for evaluating potential environmental effects. It entails extensive seabed preparation and installation activities within a high-energy Atlantic environment, yet lacks comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. The application instead proposes to rely on mitigation and contingency measures that would be formulated after consent, which hinders any substantial assessment of their sufficiency or effectiveness.

This reliance on unspecified future measures is alarming, particularly in light of the sensitive nature 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. While the application recognises risks such as sediment mobilisation and accidental chemical or oil spills, it does not offer adequate detail on methods for prevention, control, or monitoring of these risks.

Moreover, there remains uncertainty regarding the scale and dynamics of sediment

plumes generated from seabed disturbance and cable installation. In the absence of rigorous modelling and explicitly defined management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of these disturbances. This uncertainty extends to possible effects on marine species and habitats already identified as sensitive within the broader assessment.

The lack of thorough 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 available to address pollution incidents. This situation not only introduces procedural risk but also undermines the capacity of the competent authority to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the postponement of crucial environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. Significant effects and mitigation measures must be evaluated prior to granting consent, and the absence of such information renders any lawful determination impossible. Furthermore, the application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the combination of undefined mitigation measures, insufficient management plans, and uncertainty about potential impacts renders the assessment materially inadequate. These inadequacies obstruct a thorough evaluation of construction and pollution risks and further substantiate the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment concerning marine life and fisheries lacks the necessary depth and fails to adequately evaluate the ecological and socio-economic impacts involved. The waters off the West Lewis coast are home to a rich marine ecosystem and a thriving fishing industry. However, the application does not sufficiently demonstrate how these vital uses and habitats will be protected or preserved without causing significant disruption.

One critical concern is the flawed assumption that fishing activities can be relocated without any repercussions. The application lacks evidence to support the availability or accessibility of alternative fishing grounds that could handle the additional pressure. This gap in information is troubling, as displacing fishing efforts may lead to overfishing in other areas and could have broader economic repercussions for the local fishing fleet. An evidence-based assessment is essential for a clear understanding of the impacts on both fisheries and local livelihoods.

Moreover, the proposal poses substantial risks to marine species, particularly due to the underwater noise produced during the construction phase. Extended high-energy hammer piling is anticipated to disturb marine life over considerable distances, with species like dolphins being particularly affected. The expected impact on a significant

proportion of the local bottlenose dolphin population is alarming, yet the application tends to minimise these effects, lacking sufficient supporting evidence.

There is a notable inconsistency within the application regarding the need for licenses to allow harm to European Protected Species, while simultaneously describing these impacts as negligible. This contradiction casts doubt on the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially in situations where harm is expected to such an extent that it necessitates legal authorisation.

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

From a policy standpoint, the application fails to demonstrate alignment with National Planning Framework 4 or the National Marine Plan. It does not provide evidence that the development can coexist with existing marine users or that it can avoid unacceptable impacts on marine biodiversity, hindering any assertion that the proposal constitutes sustainable development.

In summary, the deficiencies present in the assessment—specifically the absence of evidence concerning fishing displacement, the minimisation of acoustic impacts, and internal contradictions—render the evaluation incomplete and unreliable. These shortcomings obstruct a comprehensive understanding of the implications for marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The project involves significant onshore infrastructure, which has been inadequately assessed, leading to an incomplete understanding of the impacts associated with what constitutes a single integrated project. The offshore turbines and onshore works are closely interrelated; however, their separate assessments create a disjointed approach that fails to capture the full scale of environmental and socio-economic effects.

Onshore components include cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. These activities necessitate excavation in areas of deep peat, particularly within Barvas Moor, a vital carbon store and ecologically important habitat. The application does not provide a thorough assessment of these impacts, which hinders a complete understanding of the project's overall environmental footprint.

By omitting or delaying the evaluation of onshore impacts, the application obstructs a proper assessment of cumulative effects. The Environmental Impact Assessment process mandates that all elements of a project be evaluated collectively, yet the distinct separation of offshore and onshore components means the overall effects on

peatlands, habitats, and communities remain unclear.

There are notable risks to sensitive habitats, including machair systems and peatland environments that receive policy protection. The application fails to illustrate that impacts on these habitats have been fully appraised or that suitable avoidance measures have been enacted, thus creating a significant evidential gap in terms of biodiversity protection.

Concerns are also raised regarding the project's carbon balance. Disturbance of peatland has the potential to release stored carbon, thereby creating a carbon debt that contradicts renewable energy development objectives. The application does not sufficiently address this concern or demonstrate that the overall carbon balance is advantageous.

Furthermore, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is a lack of evidence indicating that the necessary consents or procedures have been initiated, which brings into question the feasibility and lawful execution of the project.

From a policy standpoint, the failure to evaluate the project as a cohesive entity and to show adequate protection for peatlands, habitats, and land use interests contradicts the National Marine Plan and National Planning Framework 4. The inability to prove that impacts can be avoided or mitigated further weakens the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal significantly overlooks the assessment of nocturnal wildlife and dark skies, which represents a critical gap in the Environmental Impact Assessment. The West Lewis coastline boasts exceptionally dark skies, an essential aspect of environmental quality, cultural identity, and tourism appeal. The introduction of permanent red aviation lighting, visible over extensive distances, would create a continuous and intrusive "wall of light" effect that would drastically change the night-time environment.

Furthermore, there is a notable lack of evaluation regarding the impacts of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This omission is particularly concerning, given the significance of dark skies to the region's identity and the growth of emerging sectors such as astro-tourism. The absence of consideration for these impacts leads to a substantial deficiency in the overall landscape and environmental assessment.

Equally alarming is the failure to assess the effects on nocturnal wildlife. Species

including the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel exhibit high sensitivity to artificial lighting due to phototaxis, resulting in disorientation and increased collision risks. The lack of a lighting impact assessment or phototaxis study in the application fails to address how the proposed aviation lighting could affect these species or raise 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 dangers. Kittiwakes, for instance, are known to forage and migrate at night and are similarly vulnerable to disorientation from artificial lighting, yet this risk remains unassessed. The absence of site-specific night-time data creates a vital shortcoming in the understanding of ecological impacts.

In the absence of a nocturnal impact assessment, it becomes impossible to ascertain whether protected species or designated sites would face adverse effects. The evidential standard required to rule out adverse effects beyond reasonable scientific doubt cannot be satisfied, thereby invoking the precautionary principle and impeding a lawful determination.

From a policy standpoint, this omission contradicts National Planning Framework 4 regarding the safeguarding of natural places and the quality of the environment. It also undermines the comprehensive evaluation of landscape and seascape impacts, as the character of night-time forms a crucial component of the environment.

Overall, the complete lack of assessment concerning dark skies and nocturnal wildlife represents a significant evidential gap. The deficiency of baseline data, impact modelling, and species-specific analysis renders the application insufficient and unable to support a lawful determination.

TOURISM

The Isle of Lewis community faces significant concerns regarding the application due to the inadequate assessment of tourism impacts, which is critical for the local economy. Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness. Although the application notes that 86% of visitors are attracted by the scenery, it fails to provide a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of this key sector.

Tourism on the Isle has seen remarkable growth, rising from £65 million in 2017 to over £81.5 million and supporting more than 1,000 jobs, accounting for up to 16% of the island's economy. However, the application does not consider how the industrialisation of the seascape and a decline in environmental quality could affect Tourism Gross Value Added or broader economic resilience. Without this critical analysis, it remains unclear whether the proposed development would yield a net economic benefit or instead harm an established and expanding industry.

Furthermore, the assessment neglects the significance of environmental quality in promoting tourism, particularly the value of unspoiled landscapes and dark skies to visitors. The lack of a Dark Skies Assessment worsens this issue, leading to a serious gap in understanding the impacts on a recognised and growing segment of the local economy, including nature-based and astro-tourism markets.

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

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

The combined failures to quantify tourism impacts, assess environmental influences on visitor behaviour, and acknowledge the island's economic dependencies create a substantial evidential gap. This hinders a thorough evaluation of economic effects and reinforces the conclusion that the application lacks completeness.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm fails to meet the necessary standards for sustainable development as dictated by statutory duties and national policy. This proposal mirrors the fundamental issues that led to the rejection of the Lewis Wind Power application in 2008, which was deemed unacceptable due to the excessive scale of industrialisation. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the current application remains deficient.

It lacks a comprehensive and reliable evidential basis for assessment. Key gaps in baseline data and an undefined design envelope are significant concerns, compounded by the reliance on unspecified mitigation measures. Furthermore, crucial impact pathways—including nocturnal wildlife, full onshore infrastructure, and tourism effects—are notably absent from the assessment. This results in an Environmental Impact Assessment that is incomplete, preventing a thorough understanding of the likely significant effects or residual impacts.

There are evident procedural shortcomings. The absence of a compliant Island Communities Impact Assessment violates statutory duties outlined in the Islands (Scotland) Act 2018, while the failure to disclose the complete Social Impact Assessment constitutes a significant omission. Such gaps inhibit the competent authority's ability to evaluate the potential effects on community wellbeing, cultural identity, and economic resilience, rendering the application inappropriate for

determination.

In addition, the proposal conflicts directly with the National Planning Framework 4, as it does not sufficiently safeguard biodiversity, natural landscapes, or cultural heritage. It fails to demonstrate that health and wellbeing impacts are manageable and lacks evidence of a net economic benefit due to the lack of tourism impact modelling. The cumulative effects of the offshore and onshore components have not been adequately evaluated, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertainty surrounding environmental risks remains significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are either incomplete or inconsistent. The evidential threshold required to rule out adverse effects beyond reasonable scientific doubt has not been achieved, which invokes the precautionary principle and prevents lawful determination of the proposal's acceptability.

Moreover, the application would lead to considerable and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the erosion of dark skies, disruption of cultural and visual connections, and negative implications for tourism present permanent effects that cannot be adequately mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, alongside conflicts with policy and unresolved environmental risks, obstruct a lawful, evidence-based decision. Therefore, I formally request that consent for the Spiorad na Mara Offshore Wind Farm application is refused in its entirety.

Additional Comments

I feel that this project is far too large for the local, social, geographical, and natural area to support. I do not feel that such destruction can be justified in comparison to the damage it will cause. I do not believe that the local communities will benefit but will be worse off in all areas of their lives due to this project. If the companies/government involved wanted to work with the communities they would have done so. There are people making great gains from this financially but these peoples lives are very far away from the project and the fall out of its effects. It is a small community and it feels that is has been an ignored community by all parties who are to gain from this.

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: B7332D62

Member of the public 1379

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the marine licensing and Environmental Impact Assessment frameworks. The objection arises from a thorough review of the Environmental Impact Assessment Report and associated documentation, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural integrity. The project is set to be located off the west side of the Isle of Lewis, a region renowned for its Atlantic-facing coastline, nearly untouched natural environment, and deep-rooted cultural identity. Concerns regarding the scale, proximity, and design of this development raise serious questions about its alignment with statutory requirements, national policies, and the core principles of sustainable development.

The application itself lacks an adequate evidential foundation necessary for a lawful determination. It is evident that critical environmental data is absent, baseline information is scarce and inconsistent, and several key facets of the proposal are still not clearly defined. Moreover, the use of a flexible design framework obscures the understanding of potential significant impacts, while the reliance on unspecified mitigation measures renders it impossible to assess their effectiveness. Consequently, the documentation fails to provide a complete or informed perspective on environmental, cultural, or community repercussions, leaving unsupported claims of negligible or non-significant effects.

There are notable and significant conflicts with established policy frameworks. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regulations, and National Planning Framework 4, particularly regarding biodiversity, natural landscapes, cultural heritage, and public health. It does not successfully illustrate compliance with national obligations to safeguard biodiversity, climate-related interests, and environmental integrity. Such conflicts fundamentally challenge the statutory tests necessary for consent and compromise the ability of the competent authority to determine the proposal's acceptability in policy terms.

The unprecedented scale of this proposal poses additional concerns, with large turbines planned in close proximity to the shoreline, raising serious issues about landscape capacity, visual impact, and environmental consequences. Collectively, the lack of sufficient information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance indicate that the application is incomplete and unable to facilitate a lawful decision. In light of these circumstances, it is essential that the precautionary principle be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and transparency regarding the likely environmental effects of the proposal. The reliance on a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, introduces substantial uncertainty. This lack of specificity impedes a consistent worst-case scenario application, thereby compromising the integrity of the assessment. Consequently, the impacts reported may not accurately represent the eventual development, limiting both public understanding and that of the competent authority concerning the true extent of environmental effects.

Furthermore, the application hinges on undefined mitigation measures, monitoring strategies, and management plans, which are not yet established. Seeking consent under the premise that environmental harm will be addressed later hinders a meaningful evaluation of their effectiveness and assessment of residual impacts. This postponement of critical information to post-consent phases is procedurally unacceptable, contradicting the aims of the Environmental Impact Assessment regime that necessitates clear establishment of likely significant effects and mitigation prior to determination.

There are considerable evidential gaps, including insufficient baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. These shortcomings result in uncertainty regarding the scale and significance of impacts, especially where negligible or non-significant effect conclusions lack robust supporting data. The failure to provide adequate information hampers a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty incompatible with statutory obligations.

Consequently, the application does not satisfy the evidential threshold set by 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 does not demonstrate compliance with National Planning Framework 4, including biodiversity protection and environmental integrity requirements, as it is unclear whether impacts have been thoroughly assessed or if appropriate safeguards are in place.

In summary, the combination of an undefined design envelope, lack of specified 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 a determination based on the information supplied.

ASSESSMENT OF ALTERNATIVES

The proposed application fails to meet the statutory requirements of the Environmental Impact Assessment regime, particularly in its assessment of alternatives. Instead of offering a structured and reasoned comparison of feasible alternatives based on their environmental effects, the application presents a narrative of the project's evolution. This method does not adequately demonstrate that less harmful options have been

identified, evaluated, and chosen over more damaging solutions.

Moreover, there is a lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Notably, the developer has not shown that placing turbines further offshore has been seriously considered, despite the likelihood that such a move would reduce visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline and the critical significance of proximity to shore in assessing impact make this omission particularly concerning. Without such analysis, it is impossible to assert that the proposed siting is the least damaging option.

The deficiencies also extend to the assessment of cable routing and landfall. There is insufficient evidence indicating that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors, including areas of cultural and spiritual significance such as Barvas Cemetery. The lack of a clear avoidance strategy, coupled with the absence of comparative analysis, suggests that the principles of mitigation by design have not been employed, with an overreliance on post-design mitigation measures instead.

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

From a policy standpoint, these deficiencies undermine adherence to National Planning Framework 4, especially concerning the protection of natural areas, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission that leads to the conclusion that the application has not been properly evaluated and cannot be lawfully determined.

MARINE ECOLOGY AND PROTECTED SPECIES

The current assessment of marine ecology and protected species is significantly inadequate and fails to deliver a comprehensive or reliable understanding of ecological receptors within the coastal environment of West Lewis. This area is a sensitive and biologically active marine system, yet it is characterised by incomplete baseline data and methodologies that do not sufficiently capture the presence, behaviour, and habitat use of various species. Consequently, the assessment lacks a sound evidential basis for the evaluation of potential impacts.

One notable deficiency concerns otters, classified as a European Protected Species. The application does not adequately recognise or assess their active use of coastal regions for foraging and movement. By neglecting to account for their core foraging range and behavioural patterns, the assessment falls short in evaluating the potential impacts of construction disturbance, noise, and increased human activity. This gap

undermines any conclusions drawn regarding the absence of significant effects on this particular species.

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

The methodological shortcomings lead to conclusions regarding negligible or non-significant effects being based on assumptions rather than solid evidence. The lack of adequate baseline data also obstructs a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty about the actual scale of risks posed to marine species and their habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment framework and National Planning Framework 4, as there has been insufficient identification and assessment of protected species. The uncertainty introduced by these deficiencies means that adverse effects cannot be excluded beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these conditions, it is not lawful to grant consent.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These deficiencies inhibit a robust evaluation of impacts on marine ecology and protected species, ultimately leading to the conclusion that the application lacks an adequate evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

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

A critical inconsistency within the application emerges as the developer asserts that no significant adverse effects are anticipated while simultaneously progressing a Habitats Regulations derogation case, which is only required if significant harm is expected. This contradiction raises doubts about the reliability of the assessment, suggesting that the conclusions drawn are unsupported by the available evidence. Furthermore, the

assessment lacks sufficient evidence to ensure that seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds has not been thoroughly addressed, and the reliance on modelling methods introduces uncertainty, particularly concerning species in severe decline such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, especially in cases where baseline data is lacking and behavioural responses are not fully understood.

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

From a regulatory standpoint, the application does not meet the evidential standard required to determine that there will be no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, along with data gaps and modelling issues, indicates that the standard of beyond reasonable scientific doubt has not been satisfied. This invokes the precautionary principle and obstructs a lawful conclusion in favour of consent. Moreover, the deficiencies noted represent a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct opposition to national policy.

In summary, the assessment is unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. These inadequacies hinder a robust evaluation of impacts and reinforce the conclusion that the application fails to meet the statutory requirements necessary for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage associated with the West Lewis coastline is critically flawed. It fails to acknowledge this area as a dynamic cultural landscape where the environment, language, tradition, and community are deeply intertwined. Instead, the application reduces heritage to a series of static assets, neglecting their continuing social, cultural, and spiritual significance for the local community.

A notable shortcoming in the assessment pertains to culturally important sites such as the cemeteries located at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual significance; however, the application inaccurately categorises them as static features without recognising their ongoing relevance and the potential impacts of development on their surroundings. This mischaracterisation leads to an incomplete understanding of cultural implications and overlooks their vital role in community life.

Furthermore, the application disregards the intangible aspects of cultural heritage, such as the Gaelic language, local traditions, and the community's historical relationship with the coastal environment. These elements are essential to the area's identity and are entirely omitted from the assessment, which represents a substantial gap. Neglecting these factors severely hampers a comprehensive understanding of the cultural impacts associated with the proposed development.

Additional concerns arise regarding the rights of the community and their engagement in this process. The Gaelic-speaking population, embodying distinct cultural traits akin to those of Indigenous Peoples, has not been afforded the Free, Prior and Informed Consent process. This lack of genuine engagement undermines the credibility of the assessment and fails to adhere to established participatory principles in matters that impact cultural and environmental interests.

A critical procedural oversight is the absence of a compliant Island Communities Impact Assessment, a statutory requirement stipulated by the Islands (Scotland) Act 2018. This omission hinders the competent authority's ability to legally assess the social, cultural, and economic implications for the island community. The absence of this assessment alone precludes a lawful determination of the proposal.

From a policy standpoint, these shortcomings place the development proposal in clear opposition to the National Planning Framework 4, especially concerning the safeguarding of historic assets and places. The failure to evaluate both tangible and intangible heritage, as well as to acknowledge living cultural practices, represents a significant deviation from policy expectations.

When considered collectively, the inadequacies in assessing living heritage, intangible cultural value, community rights, and adherence to statutory duties create a substantial evidential gap. The cultural impacts of the development remain inadequately addressed, and the application fails to establish a solid foundation for assessing the genuine cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The overall evaluation of social impacts, health, and wellbeing is notably inadequate and lacks the necessary transparency for a lawful assessment. The developer engaged in a Social Impact Assessment that included focus groups with local residents; however, the complete report has not been made available. This omission creates a significant evidential gap, hindering both public understanding and the competent authority's ability to grasp the full range of social risks identified in the developer’s own research.

Summaries that are currently accessible reveal that residents are experiencing tangible levels of stress, anxiety, and concern as a result of the proposal's scale and proximity. These findings stem from direct community engagement and are therefore based on concrete evidence rather than speculation. The failure to release the full assessment limits scrutiny and restricts the capacity to evaluate the significance of these issues in

the decision-making process.

Furthermore, there is indication that the proposal is viewed as a direct threat to the community's identity and cohesion, with the term "cultural loss" arising in the developer's findings. Yet, these implications have not been adequately reflected in the primary application, nor given the appropriate consideration they warrant. Withholding the full Social Impact Assessment obscures the genuine human and social costs associated with the proposed development.

This absence of transparency also undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health effects is crucial for developments of this magnitude, especially when community character and functionality are at stake. The lack of the complete dataset means the application does not provide a thorough evidential foundation for weighing the benefits against the potential harms.

From a policy standpoint, the application fails to show alignment with National Planning Framework 4 regarding health and wellbeing. Developments are required to promote positive health outcomes and avoid detriment; however, the available evidence suggests that there are existing adverse effects that remain undisclosed. Without the full assessment, demonstrating compliance with this policy is not possible.

The procedural consequences are significant. The competent authority is unable to conduct a robust evaluation of socio-economic and health impacts due to the unavailability of the full Social Impact Assessment. This represents a material omission within the application and a failure to satisfy the evidential criteria of the Environmental Impact Assessment framework.

When taken together, the non-disclosure of the complete Social Impact Assessment, along with evidence of existing adverse effects, renders the assessment incomplete and unreliable. This situation obstructs a lawful determination and strengthens the argument that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is lacking and does not adequately reflect the significant changes that would occur or the sensitivity of the environment involved. The West Lewis coastline features an open Atlantic horizon, an undeveloped character, and a strong sense of remoteness. The introduction of large-scale turbines near the shoreline would create a continuous industrial presence, fundamentally altering the area's character and causing a permanent and irreversible transformation of the landscape.

The application does not fully represent the extent of this visual change. Due to the scale and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations. This situation would directly impact visual amenity and diminish the essential qualities of naturalness and remoteness. The

assessment does not adequately convey the level of impact or its significance concerning this sensitive landscape.

Methodological concerns also arise from the selection and presentation of visual viewpoints. Evidence suggests that these viewpoints may not fully capture the most sensitive receptors or worst-case scenarios, especially regarding key cultural heritage sites and valuable landscapes. This could mean that the magnitude of visual impact has been understated, which undermines the reliability of the assessment.

Another critical deficiency is the failure to examine the interconnected relationship between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape context linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as isolated entities without recognising their interdependence, leading to an incomplete evaluation of impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these connections, changing how heritage assets are experienced and altering their relationship with the natural horizon. This change represents not just a visual impact but also broader cultural and spatial harm that has not been adequately assessed in the application.

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4 regarding the protection of natural places and historic assets. The scale of change does not align with the requirements to safeguard landscape character, visual amenity, and the settings of culturally significant sites. Additionally, the lack of a robust worst-case assessment further undermines any claims of policy compliance.

Furthermore, the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. The resulting changes are fundamental and permanent, making them unable to be reduced to an acceptable level through mitigation.

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

CONSTRUCTION AND POLLUTION RISKS

The application lacks the necessary detail to assess environmental impacts, particularly concerning construction and pollution risks. There is a significant reliance on future mitigation and contingency measures that are to be developed after consent, which raises immediate concerns about the adequacy and effectiveness of such plans. This is especially troubling given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to disturbance and contamination from sediment.

Risks associated with sediment mobilisation and accidental spills of chemicals or oil have been acknowledged in the application; however, there is insufficient information on how these risks will be managed, controlled, or monitored. Furthermore, there is considerable uncertainty regarding the nature and scale of sediment plumes that may result from seabed disturbance and cable installation. Without robust modelling and well-defined management strategies, it is impossible to ascertain the potential ecological effects, duration, or extent of these impacts. This uncertainty also applies to marine species and habitats that are already recognised as sensitive within the broader assessment.

The shortcomings are exacerbated by the absence of detailed emergency response procedures. By postponing contingency planning until after consent, the application undermines the ability to evaluate whether adequate measures are in place to address pollution events. This creates procedural risks and limits the competent authority's capacity to assess environmental protection effectively at the point of determination.

From a regulatory standpoint, this deferral of critical environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. It is essential that significant effects and mitigation measures be evaluated before consent is granted, and the lack of such information means that a lawful determination cannot be achieved. Additionally, the application fails to demonstrate compliance with essential policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry. However, the application fails to provide a sufficient assessment of fisheries and marine life, lacking a robust evaluation of the ecological and socio-economic impacts. There is a concerning assumption that fishing activity can be displaced without any consequences. Notably, the application does not present evidence indicating that alternative fishing grounds are available, accessible, or capable of bearing additional pressure. This lack of information is critical, as such displacement could lead to overfishing in other areas, potentially impacting the local fishing fleet's economic stability. Without a detailed and evidence-based assessment, the ramifications for fisheries and local livelihoods remain unclear.

Moreover, the proposal poses significant risks to marine species, especially due to the underwater noise anticipated from construction activities. The use of high-energy hammer piling over prolonged periods is expected to create disturbances across vast distances, adversely affecting species like dolphins. The anticipated disruption to a considerable portion of the local bottlenose dolphin population is alarming, yet the

application minimises these effects without providing adequate supporting evidence.

Furthermore, there is a clear contradiction within the application that acknowledges the need for licences to allow harm to European Protected Species while simultaneously asserting that the impacts are negligible. This inconsistency casts doubt on the credibility of the assessment and raises serious questions about adherence to the Habitats Regulations, particularly concerning anticipated harm that requires legal authorisation.

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

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4 or the National Marine Plan. It fails to illustrate how the development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity, thus undermining any assertion that the proposal constitutes sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal for the project fails to adequately assess onshore infrastructure, leaving a significant gap in understanding the potential impacts of what should be evaluated as a unified project. The interrelationship between the offshore turbines and the onshore works is critical, yet the assessment treats them separately, leading to a disjointed approach that masks the true extent of environmental and socio-economic repercussions.

Specific onshore activities encompass the cabling across protected moorland, the construction of a substation in proximity to Stornoway, and the establishment of access routes through sensitive landscapes. These actions involve excavating deep peat areas, especially within Barvas Moor, a vital carbon store and ecologically delicate environment. The lack of a thorough assessment regarding these impacts restricts a full comprehension of the environmental footprint associated with the project.

By not addressing the onshore impacts directly, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be evaluated collectively; however, the division between offshore and onshore elements obscures the combined effects on peatlands, habitats, and local communities.

There are notable risks posed to sensitive habitats such as machair systems and peatland areas, which are protected under various policies. The application does not convincingly show that it has fully assessed the impacts on these habitats or that it has implemented suitable avoidance measures, resulting in a considerable evidential gap in biodiversity protection.

Moreover, concerns surrounding carbon balance arise from the disturbance of peatland, which releases stored carbon, potentially incurring a carbon debt that runs counter to the aims of renewable energy initiatives. The application falls short in addressing this critical issue or in showing that the carbon balance remains advantageous.

Additionally, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is insufficient evidence demonstrating that the necessary consents or processes have been initiated, casting doubt on the project's deliverability and legal compliance.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline features exceptionally dark skies, which are integral to the area's environmental quality, cultural identity, and tourism potential. However, the proposal introduces permanent red aviation lighting that will create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment. This significant change has not been evaluated in the Environmental Impact Assessment, which fails to consider the effects of this lighting on visual amenity, landscape character, and the experiences of residents and visitors. Such omissions are particularly concerning given the area's reliance on dark skies, especially for emerging tourism sectors like astro-tourism.

Moreover, the lack of evaluation regarding impacts on nocturnal wildlife is alarming. Species including Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are known to be highly sensitive to artificial lighting due to phototaxis, which can result in disorientation and a higher risk of collisions. The application does not provide a lighting impact assessment or a study of phototaxis, thus neglecting to address the potential effects of aviation lighting on these species and the risk of increased mortality.

Additionally, the ornithological assessment is primarily based on daytime survey data, failing to account for nocturnal activity and associated risks. For instance, Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation caused by artificial lighting, but this risk has not been assessed either. The absence of site-specific night-time data leaves a critical gap in understanding the ecological impacts.

Without a thorough assessment of nocturnal impacts, it remains impossible to ascertain whether protected species or designated sites might be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt has not been met, invoking the precautionary principle and preventing a lawful determination. Furthermore, this omission contradicts National Planning Framework 4 regarding the protection of natural places and environmental quality, while also compromising the broader evaluation of landscape and seascape impacts, as the night-time character is a vital aspect of the environment.

In summary, the failure to assess dark skies and nocturnal wildlife presents 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 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 of sustainable development as mandated by statutory duties, national policy, and evidential standards. This application mirrors the core issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was established. Despite being submitted 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 gaps in the baseline data provided, reliance on an undefined design envelope, and a lack of specified mitigation measures. Additionally, key impact pathways have been omitted, including those concerning nocturnal wildlife, the entirety of onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, failing to enable a comprehensive understanding of potential significant effects or residual impacts.

Procedural shortcomings are evident as well. The absence of a compliant Island Communities Impact Assessment breaches statutory duties established under the Islands (Scotland) Act 2018. Furthermore, the failure to disclose the full Social Impact Assessment is a material omission. These deficiencies inhibit the competent authority from accurately assessing impacts on community wellbeing, cultural identity, and economic resilience, thereby rendering the application unsuitable for determination.

The proposal also contradicts National Planning Framework 4, as it does not demonstrate adequate protection of biodiversity, natural places, or cultural heritage. It fails to present acceptable health and wellbeing impacts and lacks evidence of a net economic benefit, primarily due to the absence of tourism impact modelling. Moreover, the cumulative impact of both offshore and onshore elements has not been thoroughly assessed, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties regarding environmental risks remain significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been achieved, thus invoking the precautionary principle and precluding a lawful determination of acceptable impacts.

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

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

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

Additional Comments

This wind farm might generate more power but at what cost? Has everything really been carefully studied and risk assessed? I would urge the powers that be to refrain from potentially sacrificing whole communities and ecosystems in the name of green energy and find other less invasive ways of generating power.

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: C51F8729

Member of the public 1380

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under relevant marine licensing and Environmental Impact Assessment frameworks. The review of the Environmental Impact Assessment Report and associated documentation has revealed significant planning, environmental, cultural, and procedural deficiencies.

The proposal is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. However, the scale and design of the proposed development pose serious questions about its alignment with statutory requirements, national policy, and sustainable development principles.

Moreover, the application lacks an adequate evidential basis necessary for lawful determination. Missing critical environmental data, inconsistent baseline information, and undefined key aspects of the proposal contribute to a significant lack of clarity. The use of a flexible design framework complicates understanding of potential significant effects, while unestablished mitigation measures leave their efficacy unassessed. Consequently, this documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, with claims of negligible effects unsupported by robust evidence.

Furthermore, there are evident policy conflicts present within the proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not prove that it can meet national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly undermine the statutory tests necessary for consent and hinder the competent authority's ability to determine the development's acceptability in policy terms.

Given the unprecedented scale of this proposal and the placement of large turbines close to the shoreline, significant concerns arise related to landscape capacity, visual dominance, and environmental impact. Collectively, the deficiencies in information, dependence on undefined mitigation, evidential weaknesses, and clear policy non-compliance illustrate that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application presents a deeply concerning reliance on an undefined Project Design Envelope, lacking any firm commitment to specific turbine dimensions, layouts, or configurations. This ambiguity introduces substantial uncertainty, hindering the ability to apply a worst-case scenario consistently. As a result, the Environmental Impact Assessment Report fails to deliver a full, transparent, or reliable account of the likely environmental effects of the proposal. The implications of this deficiency are profound, as the assessment's integrity is compromised, preventing both the public and the competent authority from fully grasping the true extent of the environmental impacts.

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The inadequacy of the alternatives assessment is significant and fails to satisfy the statutory requirements outlined in the Environmental Impact Assessment regime. Instead of delivering a structured and reasoned evaluation of realistic alternatives grounded in environmental considerations, the application merely recounts the evolution of the project. This narrative fails to establish that less harmful alternatives

have been duly identified, assessed, and selected in preference to solutions that may cause greater environmental damage.

There is a notable lack of a transparent and evidence-based analysis of alternative offshore locations, development scales, or design configurations. Specifically, the developer has not demonstrated that the possibility of situating turbines further offshore has been seriously evaluated, despite the likelihood that such a move would mitigate visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline, coupled with the critical importance of proximity to shore in assessing impact, makes the absence of this analysis particularly concerning. Consequently, it is impossible to conclude that the proposed siting is the least damaging option available.

This deficiency is further reflected in the assessment of cable routing and landfall options, where there is insufficient evidence that alternative routes have been adequately explored to avoid or reduce impacts on sensitive receptors, including culturally and spiritually significant sites such as Barvas Cemetery. The absence of a clear avoidance strategy, combined with the lack of comparative analysis, indicates that the principle of mitigation by design has not been appropriately applied. Rather, the application seems to rely on measures intended to mitigate after the design process.

As a result, the application does not convincingly demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This failure to adhere to the established mitigation hierarchy prevents the competent authority from determining whether less harmful and more suitable alternatives are available. The absence of a comprehensive assessment of alternatives also raises concerns about the sustainability and compliance of the proposal with relevant policies.

From a policy standpoint, this inadequacy compromises adherence to National Planning Framework 4, particularly regarding the protection of natural environments, cultural heritage, and community wellbeing. The lack of a structured comparative assessment constitutes a material omission that contributes to the conclusion that the application lacks adequate evaluation and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

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

One significant gap in the assessment concerns otters, a European Protected Species. The application does not adequately acknowledge or evaluate their active utilisation of

coastal areas for foraging and movement. The oversight regarding their core foraging range and behavioural patterns leads to an inadequate assessment of the potential impacts arising from construction disturbance, noise, and heightened activity levels. This omission weakens any conclusions regarding the absence of significant effects on otters.

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application for the proposed development is fundamentally flawed, particularly in its ornithological assessment, which contains significant gaps in evidence and internal inconsistencies that compromise its conclusions. The site is situated along the west coast of the Isle of Lewis, an area recognised for its internationally important seabird populations, many of which are already in decline. However, the application fails to adequately demonstrate that these species will not suffer adverse effects. Key foraging areas and migratory pathways are within the development's location, yet the assessment does not properly evaluate the risks associated with displacement, collision, or habitat loss.

A glaring contradiction is present in the application, as the developer claims there will be no significant adverse effects while simultaneously proposing a Habitats Regulations derogation case, which is typically invoked only in instances where

significant harm is anticipated. This inconsistency raises serious questions about the assessment's reliability and suggests that the conclusions drawn are not supported by robust evidence. Furthermore, the assessment lacks sufficient evidence to ensure that seabirds linked to protected sites like the Lewis Peatlands and St Kilda will remain unaffected. The crucial nature of these feeding grounds has not been fully acknowledged, and the reliance on modelling introduces uncertainty, particularly for species such as Kittiwakes and Fulmars, which are in severe decline. The methodologies used are likely to underestimate mortality rates, especially in light of incomplete baseline data and a lack of comprehensive understanding regarding behavioural responses.

The placement of turbines within a recognised migratory corridor poses an additional, significant risk, as it effectively creates a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term consequences of sustained mortality within this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application fails to meet the evidential threshold necessary to assert that there will be no adverse effect on the integrity of protected sites. The presence of contradictory findings, along with data gaps and modelling deficiencies, indicates that the standard of beyond reasonable scientific doubt has not been fulfilled. This invokes the precautionary principle, thereby preventing a lawful conclusion in favour of consent.

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

In summary, the assessment is unreliable due to internal inconsistencies, methodological flaws, and insufficient evidence. These shortcomings hinder a thorough evaluation of impacts and contribute to the overall conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is fundamentally flawed, as it does not recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are intricately linked. Instead of acknowledging the ongoing social, cultural, and spiritual significance of heritage, the application reduces it to a collection of isolated, static assets.

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

assessment of cultural effects and neglects the essential role these sites play in community life.

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

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

A significant procedural oversight is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The failure to carry out this assessment prevents the competent authority from fulfilling its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone is sufficient to render a lawful determination impossible.

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

Furthermore, the evaluation does not accurately depict the magnitude of the visual alterations that would occur. Given the scale and proximity of the turbines, they would dominate the views from residential areas, historic locations, and popular coastal spots. This dominance would have a detrimental effect on visual amenity and diminish the essential qualities of naturalness and remoteness that define this area. The assessment's failure to adequately address the significance of these impacts in such a sensitive landscape is concerning.

Methodological flaws have also been identified regarding the selection and presentation of visual viewpoints. Evidence indicates that the viewpoints chosen may not fully represent the most sensitive receptors or the most severe scenarios, especially concerning critical cultural heritage sites and valued landscapes. This

oversight raises the possibility that the true scale of the visual impact has been underestimated, calling into question the reliability of the assessment's findings.

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

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks the necessary detail to adequately assess construction and pollution risks, resulting in an incomplete evaluation of potential environmental effects. Significant seabed preparation and installation works are planned within a high-energy Atlantic environment, yet the application does not provide comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on future mitigation and contingency measures that are to be developed post-consent, limiting the ability to assess their adequacy or effectiveness.

This dependence on undefined future measures is especially concerning given the sensitivity of the receiving environment. The West Lewis coastline features clean coastal waters and essential habitats that are at risk from sediment disturbance and contamination. Although the application acknowledges various risks, including sediment mobilisation and accidental spills, it fails to detail how these incidents will be

prevented, managed, or monitored.

Moreover, there is considerable uncertainty surrounding the extent and behaviour of sediment plumes caused by seabed disturbance and cable installation. Without robust modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological ramifications of these impacts. This uncertainty similarly extends to the potential effects on sensitive marine species and habitats identified in the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By deferring critical contingency planning to a post-consent phase, the proposal obstructs the evaluation of whether sufficient safeguards are in place to tackle pollution incidents. This introduces procedural risks and diminishes the capacity of the competent authority to assess environmental protection measures during the determination process.

From a regulatory standpoint, the postponement of vital environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. It is essential to assess likely significant effects and mitigation measures before granting consent, and the absence of such information renders lawful determination impossible. Furthermore, the application does not demonstrate compliance with necessary policy requirements regarding environmental protection and water quality.

In summary, the lack of defined mitigation measures, insufficient management plans, and the uncertainty surrounding potential impacts collectively render the assessment materially deficient. These deficiencies inhibit a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The current application presents a troubling lack of thoroughness in its assessment of fisheries and marine life, failing to adequately evaluate both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a vibrant marine ecosystem and a bustling fishing industry, yet there is no assurance that these essential uses and habitats can be safeguarded without significant disruption.

A critical flaw lies in the presumption that fishing activity can be displaced without repercussions. The application fails to provide evidence that there are alternative fishing grounds available, accessible, or capable of absorbing additional pressures. This oversight is particularly alarming, as it poses a risk of overfishing in other areas and may result in broader economic implications for the local fishing fleet. Without a rigorous and evidence-based assessment, it is impossible to accurately comprehend the impacts on fisheries and local livelihoods.

Moreover, the proposal poses considerable threats to marine species, especially due to the underwater noise created during construction. The prolonged use of high-energy hammer piling is expected to disturb species, such as dolphins, over significant

distances. The anticipated disturbance to a large portion of the local bottlenose dolphin population raises urgent concerns, yet the application minimizes the importance of these effects without adequate supporting evidence.

There is a marked contradiction within the application regarding the acknowledgment of the need for licences to permit harm to European Protected Species, whilst simultaneously characterising impacts as negligible. This inconsistency casts doubt on the credibility of the assessment and raises questions about adherence to the Habitats Regulations, especially in cases where harm is likely to occur at a level necessitating legal approval.

Additionally, the assessment neglects to account for cumulative impacts resulting from multiple pressures, such as habitat disturbance, noise pollution, and the displacement of fishing activities. In the absence of a thorough evaluation of these combined effects, it is not possible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application falls short of demonstrating compliance with National Planning Framework 4 or the National Marine Plan. It does not provide evidence that the proposed development can coexist harmoniously with existing marine users or prevent unacceptable harm to marine biodiversity, thereby undermining claims of sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the project lacks completeness, particularly concerning the onshore infrastructure, which fails to fully account for the impacts of what constitutes a single integrated project. The separate evaluations of the offshore turbines and onshore works result in a fragmented understanding of the environmental and socio-economic effects, obscuring the true scale of the project's overall impact.

Onshore elements of the project involve significant activities, including cabling that traverses protected moorland, the construction of a substation near Stornoway, and necessary access infrastructure through sensitive landscapes. Notably, these works include excavation in areas of deep peat, especially within Barvas Moor, which serves as a vital carbon store and ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, which prevents a comprehensive understanding of the project's environmental footprint.

The application’s exclusion or deferral of onshore impact assessments hinders proper evaluation of cumulative effects. According to the Environmental Impact Assessment process, all project components must be evaluated collectively. However, the division

between offshore and onshore assessments leads to an incomplete understanding of the combined impacts on peatlands, habitats, and surrounding communities.

Additionally, there are considerable risks posed to sensitive habitats, including machair systems and peatland environments that are protected by policy. The application does not clearly demonstrate that impacts on these habitats have been thoroughly assessed or that appropriate measures for avoidance have been implemented, resulting in a significant evidential gap regarding biodiversity protection.

Concerns also arise with respect to carbon balance. Disturbance of peatland has the potential to release stored carbon, leading to a carbon debt that may contradict the aims of renewable energy development. The application does not adequately address this issue or provide evidence that the overall carbon balance remains advantageous.

Furthermore, the routing of infrastructure through active croft land may create conflicts with existing land use and legal rights. There is insufficient evidence within the application to confirm that the necessary consents or processes have been initiated, prompting questions about deliverability and lawful implementation.

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

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

TOURISM

The application acknowledges that 86% of visitors are attracted to the Isle of Lewis due to its scenery, yet it lacks a quantified analysis of how large-scale offshore infrastructure may influence visitor numbers and overall economic contributions. The assessment of tourism impacts is critically deficient and does not evaluate the economic and social consequences for this vital sector.

Tourism on the island has experienced substantial growth, increasing from £65 million in 2017 to over £81.5 million. This growth supports more than 1,000 jobs and accounts for up to 16% of the local economy. However, the application neglects to model the potential effects of the industrialisation of the seascape and the subsequent loss of environmental quality on Tourism Gross Value Added and broader economic resilience. Without this essential analysis, it remains unclear whether the proposed development would yield a net economic benefit or harm an established and expanding sector.

Moreover, the assessment fails to consider the critical role that environmental quality

plays in supporting tourism. The importance of unspoiled landscapes and dark skies is integral to visitor experience, particularly as emerging markets such as nature-based tourism and astro-tourism grow. The absence of a Dark Skies Assessment exacerbates this deficiency, leaving a considerable gap in understanding the potential impacts on a recognised and expanding segment of the local economy.

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

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

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

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm embodies a significant failure to meet the criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. It echoes the critical issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was a key concern. This current proposal is now presented under a policy framework that should place even greater emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

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

Procedural shortcomings are evident as well. The lack of a compliant Island Communities Impact Assessment breaches statutory requirements under the Islands (Scotland) Act 2018, while the failure to provide a complete Social Impact Assessment constitutes a significant omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

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

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

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

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

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

Additional Comments

It is genuinely worrying the thought of this development going ahead. It is going to change our island forever more. I am a native, born and raised here along with previous generations of my family. I have a young family and feel saddened at the thought of this beautiful island becoming a powerhouse for the rest of Britain to benefit from. My children will not know the island without these proposed huge white towers overbearing over our environment. The island will become a conduit to transfer electricity to the grid. The landscape will be crowded with industrial infrastructure, excessively big turbines coupled with enormous cable ducts and transformers and temporary accommodation modules.

Wind power is classed/quoted as sustainable/green/clean energy but it is far from it. A project like this fails at the first hurdle of being sustainable. It needs to satisfy social, economic and environmental factors, what underpins the meaning of Sustainability.

Socially, to deliver this project a massive amount of labour is required which is largely

to be imported which would tip the balance of our island, our culture, language and traditions would become a minority and likely disappear. Crime would increase, pressure on our public services, health, education, security (policing), housing which are already stretched would be under immense strain.

Economically, there is no benefit to any of the island communities at all. Supporting small community groups/clubs with £1000 here or there towards trips, equipment or repairs to club houses or halls does not suffice and is not proportionate when you consider the vast amount of energy being generated/extracted here to be exported. It is said that this will provide work, initially yes, but as mentioned previously a lot of that will be imported too. During it's operation it will not require a lot of man power to maintain which doesn't sustain the island people with employment. We have turbines locally being controlled internationally and a small team of 10 men undertaking maintenance duties. In addition to this, it will displace fishermen having a detrimental effect on their business and the food chain. Tourism brings another income stream to the island, having these mega structures would detract from our lovely island. The views out to the Atlantic and across our vast moors ruined forever.

Environmentally, this would be devastating. A complete blot on our landscape and seascape. Displacing wildlife and sealife. The construction works associated with this would also cause displacement and decline of wildlife and sealife which is also truly saddening because the environment would generally become very barren without wildlife. The landscape would be so desolate and industrialised, completely un-natural for this environment. There are turbines on the island, however these are much smaller and give consistant and generous benefits to the communities they are associated with.

As a construction consultant, if this goes ahead I expect this to be an extremely difficult and extremely costly project not because of the scale, but because of the harsh environment it is to be put in. It would be wise to reconsider going ahead, we live in an environment with the strongest rock in the world, the fiercest and wildest weather for large parts of the year, to add to this a marine environment too.

Going back to the clean and green energy theme, the embodied energy/carbon to produce the turbines, cables, concrete and components is exorbitant. This is at the manufacturing/ordering stage, the initial stage. From then the carbon output from the hundreds or even thousands of miles lorries will be driving from quarries to make the roads for cable runs, power stations, transformers temporary accommodation and so on. Once complete, if it goes ahead (hopefully not) the maintenance will be severe. In a marine environment, there is only so long you can supress rust. You will never keep that at bay. The Forth Road Bridge is an example of maintenance in a maritime environment. I made an interesting observation recently on a turbine locally erected about 10 years ago. It is still producing, however there is a significant crack visible from the top with corrosion noted too. That is only one turbine, I can already predict the conversations/plans to rectify that and what will happen. It will be decomissioned. Therefor, what kind of lifespan will these structures have particularly since they are offshore, in a saline environment. Northland is quoting 35 years to which I think it'll be

unlikely they will reach that due to the saline environment, the extreme weather, high winds and constant strain on the structure. This level of construction and upheaval only to be decommissioned in 35 years is extreme. Then it'll all start again. Its quoted that this energy installation will reduce Scotland's Co2 emissions by 1.7M tonnes per year. I don't think the numbers will balance if you take into consideration embodied energy in manufacturing and construction and also decommissioning.

It is quoted that this project will sustain 80-120 jobs. The oil industry has sustained more jobs on the island for a longer period of time and continues too do so. Sadly, this is being wound down due to the Net Zero agenda. The population of the Isle of Lewis is approximately 18,500 people. If this project is providing say 100 jobs to a working population of 10,000. That means it is only providing 1% of the population a job. The Merchant Navy is also another significant employer locally, and has sustained good levels of employment over decades. Public sector work also provides a consistent and high level of employment locally too.

With all that being said, I truly hope this project is rejected. I hope and pray it does. I live with my family in Stornoway and every morning I look out my bedroom window which is westerly facing. It fills me with dread and sadness at the thought of seeing huge turbine blades from the other side of the island. A significant distance away.

I am grateful for the opportunity to respond and reject this project and I sincerely hope it is stopped by the powers that be.

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: 408FCEF5

Member of the public 1381

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 proposal relies on an Environmental Impact Assessment Report that is materially deficient, lacking a full, transparent, or reliable account of the potential environmental effects. A significant issue arises from the use of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations. This flexibility introduces considerable uncertainty and inhibits a consistent application of a worst-case scenario, thus compromising the integrity of the assessment. As a result, the impacts presented may not accurately reflect the development that will ultimately be constructed, hindering both the public and the competent authority from grasping the true extent of the environmental effects.

Furthermore, the application is heavily dependent on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent based on the premise that environmental harm will be addressed later prevents any meaningful evaluation of the effectiveness of these measures or an assessment of residual impacts. This deferral of critical information to post-consent stages is procedurally unacceptable, undermining the purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly established before determination.

There are also substantial evidential deficiencies, including 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 made without solid supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that fails to meet statutory requirements.

Consequently, the application does not satisfy the evidential threshold mandated under the Habitats Regulations, failing to exclude adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, which includes requirements for biodiversity protection and environmental integrity, as it has not been shown that impacts have been thoroughly assessed or that appropriate safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The proposed development raises significant concerns due to the inadequacy of the assessment of alternatives, which fails to comply with the statutory requirements of the

Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives based on their environmental effects, the application presents a narrative of project development that does not adequately demonstrate that less harmful options have been properly identified and evaluated in favour of more damaging solutions.

There is a glaring lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not convincingly show that the developer has genuinely considered positioning the turbines further offshore, where the potential for reducing visual, ecological, and coastal impacts would likely increase. Considering the sensitivity of the West Lewis coastline, along with the crucial role that proximity to shore plays in determining impact, the failure to conduct such an analysis means that it cannot be concluded that the proposed siting is the least damaging alternative.

The shortcomings are further evident in the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly explored to mitigate impacts on sensitive receptors, including culturally and spiritually significant sites such as Barvas Cemetery. The absence of a clear strategy for avoidance and the lack of comparative analysis highlight that mitigation by design has not been implemented. Instead, the application relies heavily on post-design mitigation measures.

Consequently, the application does not sufficiently 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. Without a robust assessment of alternatives, it cannot be claimed that the proposal is sustainable or compliant with policy.

From a policy standpoint, this significant deficiency undermines adherence to the National Planning Framework 4, especially concerning the protection of natural environments, cultural heritage, and community wellbeing. The absence of a systematic and comparative assessment represents a critical omission that leads to the overall conclusion that the application has not been properly evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed development fails to provide a comprehensive and reliable assessment of marine ecology and protected species within the West Lewis coastal environment. This area is recognised for its biological activity and sensitivity, yet the baseline data remains incomplete, and the methodologies used do not adequately account for species presence, behaviour, and habitat use. Consequently, the assessment lacks a sound evidential basis for evaluating potential impacts.

A significant shortcoming is found in the consideration of otters, which are a European

Protected Species. The application does not sufficiently recognise or assess their active use of coastal areas for foraging and movement. By neglecting to evaluate their core foraging range and behavioural patterns, the assessment overlooks the potential effects of construction disturbances, noise, and increased activity, ultimately undermining the conclusions drawn regarding the absence of significant impacts on this species.

Further shortcomings are evident in the assessment of basking sharks. The reliance on aerial surveys introduces substantial detection bias, particularly in challenging Atlantic conditions. This method is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that indicate their frequent use of the waters in question. The failure to include or adequately consider such data results in an incomplete understanding of the baseline, which in turn diminishes the reliability of the conclusions reached.

These methodological weaknesses mean that the determination of negligible or non-significant effects relies on assumptions rather than solid evidence. Additionally, the lack of sufficient baseline data hampers any meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises concerns regarding the true extent of risks posed to marine species and habitats.

From a regulatory standpoint, the application does not comply with the requirements of the Environmental Impact Assessment regime or National Planning Framework 4, as it has not properly identified or assessed protected species. The uncertainty generated by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, necessitating the application of the precautionary principle. In such circumstances, granting consent cannot be justified.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application fails to satisfy the evidential threshold necessary to establish no adverse effect on the integrity of protected sites. This deficiency is underscored by the presence of contradictory conclusions, coupled with significant gaps in data and limitations inherent in the modelling approaches utilised. As a result, the standard of beyond reasonable scientific doubt has not been met, thereby engaging the precautionary principle and hindering a lawful conclusion in support of consent.

The ornithological assessment is fundamentally flawed, exhibiting substantial gaps in evidence and internal inconsistencies that compromise its conclusions. The west coast of the Isle of Lewis is home to internationally significant seabird populations, many of

which are already experiencing decline. Yet, the application fails to meet the required evidential standard demonstrating that these species will not face adverse effects. Key foraging areas and migratory pathways are situated within the proposed development, yet the assessment neglects to thoroughly evaluate the potential implications of displacement, collision risk, or habitat loss.

There exists a critical contradiction within the application, whereby the developer asserts there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only necessary in instances where significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the available evidence. The assessment lacks adequate evidence to ensure that seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. Furthermore, the significance of these feeding grounds is not comprehensively addressed, and the reliance on modelling approaches introduces uncertainty, particularly for species such as Kittiwakes and Fulmars that are in critical decline. The methodologies employed are likely to underestimate mortality rates, particularly where baseline data is lacking and behavioural responses are inadequately understood.

The placement of turbines within a recognised migratory corridor presents an additional and considerable risk, effectively establishing a barrier along a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not sufficiently examine the long-term consequences of sustained mortality within this corridor or consider the potential impact on species with relatively small global populations.

The identified deficiencies also reflect a failure to comply with the National Planning Framework 4 regarding biodiversity protection and the preservation of natural assets. The inability to demonstrate that internationally significant seabird populations will not be adversely affected directly conflicts with national policy. Collectively, these factors render the assessment unreliable due to its internal inconsistencies, methodological inadequacies, and lack of sufficient evidence. Consequently, these shortcomings hinder a thorough evaluation of the impacts and lead to the overarching conclusion that the application does not satisfy the statutory requirements necessary for 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 absence of the complete Social Impact Assessment significantly hinders a thorough evaluation of social impacts, health, and wellbeing, resulting in a lack of transparency that is essential for a lawful review. Although the developer initiated a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This lack of disclosure creates a notable evidential gap, limiting both public awareness and the competent authority's understanding of the social risks uncovered by the developer's own research.

Residents are currently facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts are based on direct engagement and are not speculative. However, without access to the comprehensive assessment, proper scrutiny of the findings is impossible, thereby constraining the ability to evaluate their significance in the decision-making process.

Additionally, the proposal is viewed as a potential threat to community identity and cohesion, with concerns regarding "cultural loss" highlighted in the developer's findings. Despite this recognition, these social impacts have not been adequately addressed in the main application or afforded the appropriate consideration. The failure to disclose the full Social Impact Assessment obscures the real human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. To fully grasp the social, economic, and health implications of developments of this magnitude, particularly regarding community character and functioning, a complete dataset is vital. The current application does not provide a thorough evidential basis for weighing the benefits against potential harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Development proposals must promote positive health outcomes and avoid adverse impacts. However, the evidence available points to existing detrimental effects that have not been transparently communicated. Without the complete assessment, it is impossible to demonstrate compliance with this policy.

The procedural ramifications are considerable. The competent authority cannot carry out a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This constitutes a material omission in the application, failing to satisfy the evidential standards set by the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

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

Additionally, there is a failure to assess the interconnected relationship between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments form part of a broader landscape that is visually and spatially linked to the Atlantic horizon. The assessment treats these as isolated assets and does not recognise their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and severing their connection to the natural horizon. This constitutes not just a visual impact, but also a broader cultural and spatial harm that has not been adequately evaluated in the application.

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal presents significant deficiencies in its assessment of construction and pollution risks, which are critical for understanding potential environmental impacts. The intended seabed preparation and installation works are set to occur within a

dynamic Atlantic environment; however, there is a lack of comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. Instead, the application leans on the establishment of mitigation and contingency measures post-consent, which renders any assessment of their effectiveness or adequacy impossible at this stage.

Given the sensitivity of the receiving environment, this reliance on undefined future measures raises substantial concerns. The West Lewis coastline is home to clean coastal waters and vital habitats that are susceptible to contamination and sediment disturbance. Although the application identifies risks like sediment mobilisation and accidental spills of chemicals or oil, it fails to offer adequate strategies for preventing, controlling, or monitoring these occurrences.

Additionally, there is notable uncertainty surrounding the scale and behaviour of sediment plumes that could result from the proposed seabed disturbance and cable installation. Without thorough modelling and well-defined management strategies, it remains unclear what the ecological impacts, duration, and extent of these disturbances might be. This uncertainty also encompasses potential effects on sensitive marine species and habitats already recognised in the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning until after consent is granted, the application hinders the assessment of whether sufficient safeguards exist to address pollution incidents. This creates procedural risks and undermines the competent authority's ability to properly evaluate environmental protection measures during the determination process.

From a regulatory viewpoint, the postponement of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Evaluations of likely significant effects and mitigations must be conducted prior to granting consent. The lack of critical information not only hampers lawful determination but also demonstrates non-compliance with policy stipulations regarding environmental protection and water quality.

In summary, the deficiencies outlined—such as the absence of defined mitigation measures, insufficient management plans, and uncertainty surrounding potential impacts—render the assessment fundamentally flawed. These 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 a thriving fishing industry. However, the current application does not adequately protect these vital habitats or activities, nor does it provide a thorough assessment of the ecological and socio-economic impacts.

A major concern is the assumption that fishing can be relocated without any negative effects. The application lacks evidence showing that alternative fishing grounds are available and can handle additional strain. This is a crucial gap, as displacing fishing activities could lead to overfishing in other areas and harm the local fishing economy. Without a solid, evidence-based evaluation, the potential impacts on fisheries and the livelihoods dependent on them remain unclear.

The proposed development also poses serious risks to marine life, especially due to the underwater noise produced during construction. Extended periods of high-energy hammer piling are expected to disturb marine species over large distances, particularly dolphins. The anticipated disruption to a significant portion of the local bottlenose dolphin population is troubling. However, the application tends to minimise the importance of these disturbances without adequate supporting evidence.

There exists a clear contradiction within the application regarding the need for licenses to harm European Protected Species while simultaneously claiming that the impacts are negligible. This inconsistency undermines the reliability of the assessment and raises questions about compliance with the Habitats Regulations, especially when anticipated harm might necessitate legal permissions.

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

From a policy standpoint, the application does not prove adherence to the National Planning Framework 4 or the National Marine Plan. It falls short of demonstrating that the development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, obstructing any conclusion regarding its sustainability.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal presents an incomplete assessment of the onshore infrastructure, overlooking the comprehensive impacts that arise from this interconnected project. The offshore turbines and onshore works are inherently related, yet they have been evaluated separately, leading to a disjointed approach that obscures the true extent of environmental and socio-economic implications.

Significantly, the onshore components encompass cabling across protected moorland, the construction of a substation near Stornoway, and access infrastructure traversing sensitive landscapes. These activities involve excavation in areas of deep peat,

particularly within Barvas Moor, recognised as a crucial carbon store and ecologically sensitive habitat. The application fails to deliver a thorough evaluation of these impacts, which hampers a full understanding of the project's overall environmental footprint.

By excluding or postponing the assessment of onshore impacts, the application inhibits a proper appraisal of cumulative effects. The Environmental Impact Assessment process stipulates that all parts of a project must be reviewed collectively; however, the division between offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities remain inadequately understood.

Moreover, there are considerable risks posed to sensitive habitats, including machair systems and peatland environments, which enjoy policy protection. The application does not sufficiently demonstrate that impacts on these habitats have been comprehensively assessed or that suitable avoidance measures have been put in place, resulting in a significant evidential gap concerning biodiversity protection.

The proposal also raises critical concerns regarding carbon balance. The disturbance of peatland can lead to the release of stored carbon, potentially resulting in a carbon debt that contradicts the aims of renewable energy initiatives. The application inadequately addresses this matter or shows that the overall carbon balance remains advantageous.

Additionally, routing infrastructure through active croft land may lead to conflicts with current land use and legal rights. The application lacks evidence that the necessary consents or processes have been initiated, casting doubt on the feasibility and lawful execution of the project.

From a policy standpoint, the failure to consider the project as a whole and to demonstrate the protection of peatlands, habitats, and land use interests runs counter to the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further detracts from the application’s validity.

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

DARK SKIES AND NOCTURNAL WILDLIFE

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

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

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

This issue is exacerbated by the reliance on daytime survey data within the ornithological assessment, which fails to capture nocturnal activities and associated risks. Kittiwakes, for example, may forage or migrate at night and are susceptible to disorientation from artificial lighting; however, this risk has not been evaluated. The absence of site-specific night-time data creates a significant gap in understanding the ecological impacts of the proposal.

Without a thorough assessment of nocturnal impacts, it remains unclear whether protected species or designated sites may face adverse effects. The evidential standard necessary to eliminate adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and hindering lawful determination.

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

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

TOURISM

The application presents a significant deficiency in its assessment of tourism impacts, neglecting to evaluate the economic and social consequences for a crucial 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. Although it is acknowledged that 86% of visitors are attracted by the scenery, there is no quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution from tourism.

Tourism has experienced substantial growth, increasing 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. Nevertheless, the application fails to model 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 region. In the absence of such analysis, it remains uncertain whether the proposed development would yield a net economic benefit or jeopardise an established and expanding sector.

Moreover, the evaluation overlooks the significance of environmental quality in bolstering 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 exacerbates this shortcoming, creating a notable gap in understanding the impacts on a recognised and expanding segment of the local economy.

In a context where the island community has limited economic diversification, the oversight in assessing tourism impacts has broader ramifications for employment, local businesses, and community sustainability. The failure to provide a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been appraised as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with the National Planning Framework 4, particularly concerning economic impact and the necessity to exhibit a net benefit. Furthermore, it conflicts with strategic objectives that recognise tourism as a priority growth sector, and it does not furnish adequate evidence to enable the competent authority to evaluate the economic consequences of the proposal.

Collectively, the inability to quantify tourism impacts, assess the environmental factors that drive visitor behaviour, and consider the island's economic dependency results in a substantial evidential gap. This limitation undermines the capacity for 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 exemplifies a significant shortfall in meeting the standards of sustainable development as required by statutory duties, national policy, and evidential criteria. This application revisits the fundamental issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Now, it is being evaluated under an enhanced policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and the wellbeing of communities.

Critical deficiencies in the evidential basis for this application are apparent. There are significant gaps in baseline data, the use of an undefined design envelope, and a reliance on unspecified mitigation measures. Additionally, it neglects important impact

pathways such as nocturnal wildlife, complete onshore infrastructure, and the potential effects on tourism. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a thorough understanding of likely significant effects or residual impacts.

Procedural inadequacies are also evident. The lack of a compliant Island Communities Impact Assessment breaches the statutory duty outlined in the Islands (Scotland) Act 2018. Furthermore, the non-disclosure of a complete Social Impact Assessment represents a substantial omission. These shortcomings hinder the competent authority from properly evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal stands in direct opposition to National Planning Framework 4. It does not demonstrate protection for biodiversity, natural environments, or cultural heritage. Additionally, it fails to show that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, primarily due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been adequately assessed, obscuring their consequences on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in parts. The necessary evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been satisfied, thereby invoking the precautionary principle and barring a lawful conclusion regarding acceptable impacts.

Moreover, the proposal would lead to substantial and irreversible changes to a particularly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual relationships, and the negative consequences for tourism represent enduring effects that cannot be mitigated to a satisfactory level.

In summary, the application is both procedurally and substantively inadequate for determination. The extensive information gaps, policy conflicts, and unresolved environmental risks collectively preclude a lawful and evidence-based decision. The competent authority should either deny consent on these grounds or enforce relevant regulatory provisions to mandate the submission of the missing information.

Therefore, a formal request is made for the refusal of the Spiorad na Mara Offshore Wind Farm application 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: B1AEB42D

Member of the public 1382

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection is based on a thorough review of the Environmental Impact Assessment Report and associated documents, highlighting significant deficiencies in planning, environmental considerations, cultural impacts, 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 strong cultural identity. Concerns arise from the proposal's scale, proximity, and design, which challenge its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks an adequate evidential basis for lawful determination. There are critical gaps in environmental data, limited and inconsistent baseline information, and undefined key aspects of the proposal. The flexible design framework employed hinders a clear assessment of potential significant effects, while the reliance on unspecified mitigation measures prevents an evaluation of their effectiveness. 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 support.

Substantial conflicts with policy are evident. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. These inconsistencies directly impact the statutory tests necessary for consent and compromise the ability of the competent authority to determine the development as policy-compliant.

The unprecedented scale of the proposal raises significant concerns, with large turbines planned in close proximity to the shoreline, leading to issues related to landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance illustrates that the application is incomplete and cannot support a lawful determination. In this context, it is essential that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report demonstrates substantial deficiencies, failing to deliver a comprehensive, transparent, and trustworthy evaluation of the anticipated environmental impacts associated with the proposal. Notably, the absence of specific turbine dimensions, layouts, or configurations due to the reliance on a flexible Project Design Envelope creates considerable uncertainty. This lack of clarity undermines the assessment's integrity, leading to the potential that the impacts delineated may not accurately mirror the eventual development, thus obstructing both public and competent authority comprehension of the true nature of environmental effects.

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The West Lewis coastline is particularly sensitive, making the proximity to shore a crucial factor in determining environmental impact. Unfortunately, the assessment of

alternatives within the application is materially inadequate and does not comply with the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a well-structured and reasoned comparison of realistic alternatives based on their environmental effects, the application merely recounts the project's evolution. This narrative approach fails to show that less harmful options have been properly identified, assessed, and selected over more damaging solutions.

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

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

A troubling contradiction arises as the developer claims no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only

necessary when significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment, suggesting that the conclusions drawn are unsupported by the available evidence.

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

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is lacking in detail, making it difficult to evaluate potential environmental effects. There is substantial seabed preparation and installation work proposed in a high-energy Atlantic environment, yet there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included. Instead, the application relies on mitigation and contingency measures that would be prepared after consent is granted, which hampers any meaningful assessment of their effectiveness or adequacy.

Given the sensitivity of the receiving environment, this reliance on undefined future measures is particularly concerning. The West Lewis coastline is home to clean coastal

waters and important habitats that could be impacted by sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental spills of chemicals or oil, it fails to provide adequate detail on how these issues 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 also extends to the potential effects on marine species and habitats that are already known to be sensitive within the broader assessment.

The lack of detailed emergency response procedures further exacerbates these concerns. By postponing contingency planning until after consent is obtained, the application inhibits the evaluation of whether sufficient safeguards are in place to address pollution incidents. This creates procedural risk and undermines the competent authority's ability to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the Environmental Impact Assessment regime requirements. Significant effects and mitigation measures must be assessed prior to granting consent, and without this information, a lawful determination cannot be made. The application also does not demonstrate compliance with policy requirements related to environmental protection and water quality.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the proposed project is fundamentally flawed due to its incomplete evaluation of onshore infrastructure, which fails to take into account the interconnected impacts of the offshore turbines and onshore works. This disjointed approach leads to an obscured understanding of the true scale of environmental and socio-economic effects, as the elements are considered separately.

Integral to the onshore works are the installation of cabling across 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 of deep peat, particularly in Barvas Moor, an important carbon store and ecologically sensitive habitat. The application lacks a comprehensive assessment of the potential impacts of these works, which hampers the ability to fully gauge the project's overall environmental footprint.

Furthermore, the absence or deferral of onshore impact assessments obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively. However, by treating offshore and onshore components separately, the combined consequences on peatlands, habitats, and local communities are inadequately understood.

Sensitive habitats, including machair systems and peatland environments, face significant risks and are subject to policy protection. The application does not satisfactorily demonstrate that the potential impacts on these habitats have been thoroughly assessed or that effective avoidance measures are in place. This creates a discernible evidential gap concerning the protection of biodiversity.

The proposal raises additional concerns relating to carbon balance. Disturbing peatland releases stored carbon, potentially resulting in a carbon debt that runs counter to the goals of renewable energy development. The application does not sufficiently address this matter or show that the overall carbon balance remains advantageous.

Moreover, routing infrastructure through active croft land introduces possible conflicts with existing land use and legal rights. The application lacks evidence that the necessary consents or processes for these activities have been initiated, which raises doubts about both deliverability and lawful implementation.

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 inconsistent with the National Marine Plan and National Planning Framework 4. The inability to prove that impacts can be avoided or mitigated further diminishes the credibility of the application.

In conclusion, the fragmented treatment of project components, the lack of a thorough assessment, and insufficient evidence regarding environmental and land use impacts result in a portion of the application being incomplete and unreliable, which precludes a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment of dark skies and nocturnal wildlife in the Environmental Impact Assessment represents a substantial oversight. The West Lewis coastline is noted for its exceptionally dark skies, which are integral to the area's 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 a disruptive "wall of light" that would significantly alter the night-time atmosphere.

Moreover, the application neglects to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This

oversight is particularly important considering the role of dark skies in the identity of the region and the growth of tourism sectors such as astro-tourism. As a result, this failure leads to a considerable gap in the comprehensive landscape and environmental assessment.

Additionally, there is no consideration of the impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting, which can result in disorientation and an increased risk of collision. The proposal lacks a lighting impact assessment or a study on phototaxis, meaning it fails to evaluate how aviation lighting may affect these vulnerable species or contribute to increased mortality rates.

This deficiency is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which does not adequately represent nocturnal activity or the associated risks. Kittiwakes, for instance, may forage or migrate during the night, and the disorientation caused by artificial lighting poses a risk that has not been addressed. The lack of specific night-time data is a critical gap in understanding the ecological impacts.

Without an evaluation of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would face adverse effects. The evidential standard required to eliminate adverse effects beyond reasonable scientific doubt is not fulfilled, which engages the precautionary principle and hampers a lawful determination.

From a policy standpoint, this omission contradicts the National Planning Framework 4 regarding the preservation of natural areas and environmental quality. It also undermines a broader assessment of landscape and seascape impacts, as the character of the night forms a crucial element of the environment.

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

TOURISM

The examination of tourism impacts within the application is severely lacking, failing to adequately address the economic and social implications for a crucial sector of the Isle of Lewis economy. The dependency of tourism on the region's natural attributes, such as its wild coastline, near-pristine landscapes, dark skies, and sense of remoteness, is significant. Notably, while the application acknowledges that 86% of visitors are attracted by the scenery, it does not provide a quantified analysis regarding how large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contributions of the sector.

Furthermore, tourism in the area has experienced marked growth, rising from £65

million in 2017 to over £81.5 million, while supporting more than 1,000 jobs and constituting up to 16% of the island's economy. However, the application fails to model the potential impacts of seascape industrialisation and environmental degradation on the Tourism Gross Value Added and the broader economic resilience of the community. The absence of this critical analysis means that it remains unclear whether the development would provide a net economic benefit or detract from an established and expanding industry.

The assessment notably neglects to consider how environmental quality underpins tourism, particularly the significance of unspoiled landscapes and dark skies for visitor experiences and emerging sectors such as nature-based tourism and astro-tourism. Additionally, the lack of a Dark Skies Assessment exacerbates this deficiency, leaving a considerable gap in the understanding of impacts on an acknowledged and burgeoning segment of the local economy.

The implications of the inadequate assessment extend beyond tourism alone, especially in an island community characterised by limited economic diversification. The oversight regarding tourism impacts carries broader ramifications for employment, local businesses, and community sustainability. The failure to conduct 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 regulatory standpoint, the application does not sufficiently demonstrate adherence to the National Planning Framework 4, especially concerning economic impacts and the requisite demonstration of net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector, lacking the necessary evidence for the competent authority to evaluate the economic repercussions of the proposal adequately.

In summary, the cumulative effect of not quantifying tourism impacts, neglecting to assess the environmental factors influencing visitor behaviour, and overlooking the island's economic dependencies culminates in a substantial evidential gap. This inadequacy obstructs a comprehensive evaluation of the economic effects and leads to the conclusion that the application remains incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal reveals critical shortcomings in its approach to sustainable development, failing to meet statutory duties, national policy, and evidential standards. This application mirrors the issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was a key factor. Now, under a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, these same concerns are raised yet again.

A reliable evidential basis for the determination is notably lacking in this proposal. There are significant gaps in baseline data, an ambiguous design envelope is used, and

the mitigation measures proposed remain unspecified. Furthermore, crucial impact pathways such as nocturnal wildlife, full onshore infrastructure, and tourism effects have not been addressed. As a result, the Environmental Impact Assessment is inadequate, leaving a comprehensive understanding of likely significant effects or residual impacts unattainable.

The procedural aspects of the proposal also exhibit clear failures. The missing compliant Island Communities Impact Assessment breaches the statutory duty outlined in the Islands (Scotland) Act 2018. Additionally, the lack of a full Social Impact Assessment is a material omission. Such deficiencies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

Moreover, this proposal is at odds with National Planning Framework 4, as it fails to protect biodiversity, natural landscapes, and cultural heritage. It does not adequately address health and wellbeing impacts and lacks evidence of any net economic benefit, particularly due to the absence of tourism impact modelling. The cumulative effects of offshore and onshore components have not been thoroughly evaluated, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and could be significant. Assessments of marine ecology, seabirds, protected species, and marine mammals are incomplete, and some inconsistencies exist within the findings. The evidential threshold required to confidently exclude adverse effects has not been met, activating the precautionary principle and obstructing a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is procedurally and substantively unfit for determination. The extensive deficiencies in information, combined with conflicts with policy and unresolved environmental risks, hinder any lawful and evidence-based decision. The competent authority must either refuse consent based on these grounds or invoke the necessary regulatory provisions to obtain the missing 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: B588DDC1

Member of the public 1383

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm. The objection arises from an assessment of the Environmental Impact Assessment Report and accompanying documents, highlighting significant deficiencies in planning, environmental considerations, cultural matters, and procedural aspects. The project is situated off the west side of the Isle of Lewis, a region characterised by its Atlantic-facing coastline, near-pristine environment, and vibrant cultural identity. Concerns regarding the proposal's scale, proximity to the shore, and overall design raise serious questions about its adherence to statutory obligations, national policy frameworks, and sustainable development principles.

The application lacks a robust evidential foundation necessary for a lawful decision. There are critical gaps in environmental data, with baseline information proving to be both limited and inconsistent. Furthermore, key elements of the proposal remain ambiguous. The utilisation of a flexible design framework obscures potential significant effects, and the reliance on unspecified mitigation measures hinders any assessment of their potential efficacy. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community repercussions, with assertions of negligible or non-significant impacts lacking solid evidence.

Policy discrepancies are evident and substantial. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment protocols, or National Planning Framework 4, particularly concerning biodiversity, natural areas, cultural heritage, and public health. It does not convincingly demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. These conflicts directly challenge the statutory tests necessary for consent, compromising the ability of the competent authority to determine the proposal's acceptability within policy parameters.

The unprecedented scale of the project, with large turbines situated in close proximity to the coastline, raises substantial issues related to landscape capacity, visual impact, and overall environmental implications. Collectively, the deficiencies in information, reliance on undefined mitigation strategies, evidential shortcomings, and evident policy violations indicate that the application is incomplete and cannot substantiate a lawful decision. Under these circumstances, it is imperative that the precautionary principle is invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies that undermine its reliability and transparency regarding the environmental impacts of the proposal. A notable issue is the reliance on a flexible Project Design Envelope, which lacks definitive turbine dimensions, layouts, or configurations. This absence creates uncertainty and hinders the effective application of worst-case scenario assessments. Consequently, the presented impacts may not accurately reflect the final construction, making it difficult for both the public and the competent authority to grasp the full extent of the potential environmental effects.

Additionally, the application is contingent upon mitigation measures, management plans, and monitoring strategies that are currently undefined. Seeking consent with the expectation that these environmental harms will be addressed at a later stage undermines the possibility of a meaningful evaluation of their effectiveness or the assessment of residual impacts. This postponement of critical information to post-consent phases is procedurally unacceptable and contradicts the Environmental Impact Assessment regime's purpose, which mandates that likely significant effects and mitigation measures be clearly established before determination.

There are also profound evidential shortcomings within the assessment, including gaps in baseline data and limitations in methodology, as well as a reliance on assumptions rather than concrete, site-specific evidence. This leads to uncertainty concerning the magnitude and significance of impacts, particularly where conclusions of negligible or non-significant effects lack robust supporting data. The inadequacy of information prevents a clear understanding of cumulative and worst-case impacts and introduces a degree of scientific uncertainty that does not align with statutory requirements.

Moreover, these factors mean the application does not satisfy the evidential threshold established under the Habitats Regulations, which demands the exclusion of adverse effects beyond reasonable scientific doubt. The precautionary principle is thus engaged, especially in relation to protected species and sensitive habitats. The proposal also fails to demonstrate adherence to National Planning Framework 4, including stipulations regarding biodiversity protection and environmental integrity, as it is impossible to verify that impacts have been comprehensively assessed or that suitable safeguards are in place.

In summary, the combination of an undefined design envelope, lack of specified mitigation strategies, and significant gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies obstruct a lawful and thorough evaluation of environmental effects, meaning the competent authority lacks sufficient information to make an informed determination regarding the application.

ASSESSMENT OF ALTERNATIVES

The application lacks a structured and evidence-based assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. It does not provide a reasoned comparison of realistic alternatives based on

their environmental effects but instead presents a narrative of project evolution. This approach does not adequately demonstrate that less harmful options have been identified, assessed, and preferred over more damaging solutions.

There is a noticeable absence of transparent comparisons concerning alternative offshore locations, development scales, or design configurations. Specifically, the developer has not shown that they have seriously considered positioning the turbines further offshore, which would likely reduce visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline, as well as the critical role of proximity to shore in assessing impact, the lack of such analysis precludes any conclusion that the proposed siting is the least damaging option.

The deficiencies in the application also extend to the assessment of cable routing and landfall, revealing insufficient evidence that alternative routes have been thoroughly examined to avoid or mitigate impacts on sensitive receptors. This includes significant areas of cultural and spiritual importance, such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis demonstrates that mitigation by design has not been implemented, resulting in an over-reliance on post-design mitigation measures.

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The coastal environment of West Lewis is a highly sensitive and biologically active marine system. However, the assessment of marine ecology and protected species conducted in relation to this area is materially deficient, failing to provide a complete or reliable understanding of the ecological receptors involved. The baseline data is incomplete, and the methodologies employed do not adequately capture crucial information regarding species presence, behaviour, and habitat use. Consequently, the conclusions drawn do not rest on a sound evidential basis for evaluating potential impacts.

Particularly concerning is the omission of otters, which are a European Protected Species. The application neglects to properly recognise and assess their active use of

coastal areas for foraging and movement. This oversight in considering their core foraging range and behavioural patterns means that the potential effects of construction-related disturbance, noise, and increased activity have not been properly evaluated. As a result, the assessment's conclusions regarding the absence of significant effects on otters are undermined.

Further shortcomings arise in the evaluation of basking sharks. The reliance on aerial surveys introduces significant detection bias, especially in Atlantic conditions. This method is likely to underestimate the actual presence of these sharks, particularly when compared to established land-based observations that indicate their frequent use of these waters. The failure to incorporate or adequately consider such data leads to an incomplete baseline and undermines the reliability of the conclusions presented.

These methodological deficiencies mean that the claims of negligible or non-significant effects are based more on assumptions than on robust evidence. The lack of sufficient baseline data hinders the meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty regarding the true scale of risk posed to marine species and habitats.

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

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These issues hinder a thorough evaluation of the impacts on marine ecology and protected species and contribute to the overall conclusion that the application lacks 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 along the West Lewis coastline is fundamentally flawed, failing to recognise this area as a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. The application adopts an overly simplistic view of heritage, treating it as a collection of isolated, static assets instead of acknowledging their ongoing social, cultural, and spiritual significance within the community.

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

Moreover, intangible cultural heritage, including the Gaelic language and local traditions, as well as the community's enduring relationship with the coastal

environment, is not adequately addressed. These aspects are fundamental to the area's identity but are completely omitted from the assessment, representing a significant oversight. Without considering these essential factors, the full cultural impact of the proposed development remains obscured.

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development raises significant concerns regarding the assessment of social impacts, health, and wellbeing. The developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the full report remains unpublished. This absence creates a notable evidential gap, hindering both public understanding and the competent authority's capacity to grasp the full scope of social risks highlighted in the developer's research.

Summaries that are available reveal that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement with the community and are therefore not mere speculation. Nonetheless, the lack of disclosure of the complete assessment limits proper scrutiny and undermines the significance of these findings in the decision-making process.

The proposal is also viewed as a threat to community identity and cohesion, with

findings indicating “cultural loss” identified in the developer’s own research. Despite these critical insights, they have not been sufficiently integrated into the main application or given the weight they deserve. The decision to withhold the full Social Impact Assessment obscures the true human and social cost associated with the development.

This lack of transparency undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is vital for developments of this scale, particularly in relation to community character and functioning. Without the complete dataset, the application fails to provide an adequate evidential basis to assess the balance between potential benefits and harm.

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, seascape, and landscape is fundamentally inadequate and fails to capture the full extent of change or the vulnerability of the surrounding environment. The character of the West Lewis coastline is characterised by its unspoilt Atlantic views, lack of development, and a pronounced sense of remoteness. The proposed large-scale turbines positioned near the shoreline would create an industrial presence that is both continuous and dominant, leading to a permanent and irreversible alteration of this landscape.

The representation of the visual changes resulting from the application is insufficient. Given the scale and close proximity of the turbines, they are set to dominate the views from residential zones, historical landmarks, and popular coastal areas. This intrusion would impact visual amenity directly and diminish the essential qualities of naturalness and remoteness. The assessment does not convey the true significance of this impact within the framework of such a sensitive landscape.

Methodological issues arise concerning the selection and display of visual viewpoints.

Evidence indicates that the viewpoints presented may not adequately represent the most sensitive receptors or worst-case scenarios, particularly in relation to crucial cultural heritage sites and landscapes of high value. This raises concerns that the extent of visual impact may have been understated, thereby compromising the reliability of the assessment.

Moreover, the assessment neglects to evaluate the interconnectedness of landscape, seascape, and cultural heritage. Notably, locations such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape, interconnected through visual and spatial relationships with the Atlantic horizon. By treating these sites as isolated entities, the assessment fails to acknowledge their interdependence, resulting in an incomplete analysis of impacts on their setting and cultural importance.

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

From a policy standpoint, the proposal directly contravenes National Planning Framework 4 regarding the safeguarding of natural environments and historic assets. The magnitude of change is incompatible with the obligation to maintain landscape character, visual amenity, and the context of culturally significant locations. The lack of a thorough worst-case analysis further diminishes any assertion of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be both dominant and unavoidable. Consequently, the change is profound and permanent, rather than reducible to an acceptable level through mitigation efforts.

In summary, the assessment does not accurately reflect the degree of impact, the sensitivity of the environment, or the interconnected relationships between landscape and heritage. These shortcomings preclude a dependable evaluation and reinforce the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposed development presents significant deficiencies in the assessment of construction and pollution risks, which are insufficient for evaluating potential environmental effects. The project entails extensive seabed preparation and installation activities in a high-energy Atlantic environment. However, there are no fully articulated Construction Environmental Management Plans or Pollution Prevention Plans provided. Instead, the application defers mitigation and contingency measures to a post-consent phase, which impedes any substantial assessment of their adequacy or effectiveness.

This approach is particularly troubling given the delicate nature of the receiving

environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are susceptible to both sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it fails to offer adequate detail on preventative, control, or monitoring strategies.

Moreover, there is considerable uncertainty regarding the scale and behaviour of sediment plumes generated from seabed disruption and cable installation. In the absence of robust modelling and explicit management strategies, it remains impossible to ascertain the extent, duration, or ecological consequences of these effects. This uncertainty also extends to potential impacts on marine species and habitats already recognised as sensitive within the broader assessment.

The lack of comprehensive emergency response procedures only exacerbates these issues. By postponing contingency planning until after consent is granted, the application obstructs the evaluation of whether sufficient safeguards are in place to address pollution incidents. This creates procedural risk and diminishes the capacity of the competent authority to assess environmental protection measures at the decision-making stage.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. An assessment of likely significant effects and their corresponding mitigation must occur prior to consent; where such information is lacking, a lawful determination cannot be achieved. Additionally, the application fails to demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts collectively render the assessment materially inadequate. These shortcomings hinder a thorough evaluation of construction and pollution risks and further reinforce the assertion that the application remains incomplete.

FISHERIES AND MARINE LIFE

The proposal presents significant risks to marine species, particularly due to the underwater noise created during construction. The anticipated high-energy hammer piling over an extended duration is likely to disturb marine life across large areas, notably impacting local populations of dolphins. The potential disturbance to a considerable segment of the bottlenose dolphin population is a major concern; however, the application fails to adequately address the severity of these effects and lacks sufficient supporting evidence.

In addition to the risks to marine species, the application inadequately assesses the implications for fisheries and marine life, providing a poor evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a vibrant marine ecosystem and a vital fishing industry, yet the application does not

demonstrate how these habitats and uses can be preserved or maintained without causing significant disruption.

A crucial flaw in the application is the assumption that fishing activities can be relocated without any negative consequences. The proposal lacks evidence to confirm that alternative fishing grounds are available and viable for supporting the additional pressure from displaced activities. This significant omission raises the risk of overfishing in other areas and could lead to broader economic repercussions for the local fishing fleet. Without a thorough and evidence-based assessment, the implications for fisheries and local livelihoods remain unclear.

Furthermore, the assessment fails to adequately address cumulative impacts that may arise from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. The inability to evaluate these combined effects inhibits a full understanding of the overall impact on marine ecosystems and socio-economic conditions.

The application also shows a notable inconsistency regarding the need for licenses to permit harm to European Protected Species while simultaneously claiming that impacts are negligible. This contradiction seriously undermines the credibility of the assessment and raises concerns about compliance with the Habitats Regulations, especially where harm is expected to a degree that necessitates legal authorisation.

From a policy standpoint, the application does not prove 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 mitigate unacceptable impacts on marine biodiversity, which obstructs any conclusion that the proposal is sustainable.

Overall, the lack of substantiated evidence concerning fishing displacement, the minimisation of acoustic impacts, and the inconsistencies throughout the assessment render it incomplete and unreliable. These shortcomings hinder the ability to conduct a thorough evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

Among the onshore elements are the installation of cabling across protected moorland, the construction of a substation near Stornoway, and the necessary access infrastructure that traverses sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which is recognized as a significant

carbon store and an ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, thereby inhibiting a comprehensive understanding of the project's overall environmental footprint.

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

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

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The application lacks an assessment of dark skies and nocturnal wildlife, which is a significant omission in the Environmental Impact Assessment. The coastline of West Lewis features exceptionally dark skies that contribute to environmental quality, cultural identity, and tourism. However, the proposal introduces permanent red aviation lighting that would create a continuous and intrusive light effect across the western horizon, fundamentally changing the night-time environment.

There is no evaluation of how this lighting would impact visual amenity, landscape character, or the experiences of residents and visitors. This is particularly important as dark skies play a critical role in the area's identity and the growth of sectors like astro-tourism. The absence of this analysis creates a clear gap in the overall landscape and environmental assessment.

Moreover, impacts on nocturnal wildlife have not been evaluated. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can lead to disorientation and increased risk of collision. The application fails to include any assessment of lighting impacts or phototaxis studies, meaning the potential effects on these species and the risk of increased mortality remain unexamined.

This issue is further complicated by the reliance on daytime survey data in the ornithological assessment, which does not account for nocturnal activity or associated risks. Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been assessed. The lack of site-specific night-time data leaves a critical gap in understanding ecological impacts.

Without an assessment of nocturnal impacts, it is impossible to determine whether protected species or designated sites would face adverse effects. The necessary evidential standard to exclude adverse effects beyond reasonable scientific doubt cannot be fulfilled, which invokes the precautionary principle and impedes a lawful determination.

From a policy standpoint, this omission goes against National Planning Framework 4 concerning the protection of natural places and environmental quality. It also compromises the overall assessment of landscape and seascape impacts, as the character of night-time is an essential part of the environment.

Overall, the absence of any assessment of dark skies and nocturnal wildlife represents a significant evidential gap. The lack of baseline data, impact modelling, and species-specific analysis makes the application incomplete and unsuitable for lawful determination.

TOURISM

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

Tourism has experienced considerable growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and making up to 16% of the island's

economy. However, the failure to model the potential impact of seascape industrialisation and the loss of environmental quality on Tourism Gross Value Added and overall economic resilience is concerning. Without this analysis, it remains unclear if the proposed development would yield a net economic benefit or hinder an established and expanding sector.

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

In an island community characterised by limited economic diversification, the inadequate evaluation of tourism impacts raises serious concerns regarding employment, local businesses, and community sustainability. The omission of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been examined as required by the Islands (Scotland) Act 2018.

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

Overall, the combination of insufficient quantification of tourism impacts, neglect of the environmental factors influencing visitor behaviour, and disregard for the island's economic dependency leads to a critical evidential shortcoming. This deficiency hampers a thorough evaluation of the economic effects and reinforces the conclusion that the application is incomplete.

SUMMARY

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

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

Procedural deficiencies are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, and the incomplete disclosure of the Social Impact Assessment constitutes a material omission. These inadequacies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unsuitable for determination.

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

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

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

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

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

Additional Comments

In addition to the key objection points, the biggest issue for me is the fact that the power generated will not be primarily used to reduce cost impact for island residents but the power will be sent to the mainland to benfit others. Island residents should get first benefit if this goes ahead

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: AA7BCFF6

Member of the public 1384

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. A thorough review of the Environmental Impact Assessment Report and supporting documentation has identified several significant deficiencies in material planning, environmental considerations, cultural aspects, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, an area notable for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

The application lacks an adequate evidential basis necessary for a lawful determination. There is a significant absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Furthermore, key aspects of the proposal remain ill-defined. The use of a flexible design framework obscures a clear understanding of the likely significant effects, while the reliance on unspecified mitigation measures raises concerns about their potential effectiveness. Consequently, the available documentation fails to offer a comprehensive or informed assessment of the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by robust evidence.

Moreover, there are evident and substantive conflicts with policy. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements intended to protect biodiversity, climate interests, and environmental integrity. These policy conflicts directly impact the statutory tests required for consent, thus undermining the ability of the competent authority to deem the development acceptable within policy parameters.

The scale of this proposal is unprecedented for the location, with large turbines positioned close to the shoreline. This raises significant concerns about landscape capacity, visual dominance, and overall environmental impact. The combination of insufficient information, reliance on undefined mitigation measures, evidential weaknesses, and evident 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 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 inadequacy in the assessment of alternatives significantly undermines the statutory requirements of the Environmental Impact Assessment regime. Rather than

offering a structured and reasoned comparison of viable alternatives based on environmental effects, the application provides a narrative of project evolution that fails to demonstrate that less harmful options have been properly identified and assessed in favour of more damaging solutions.

There is a notable absence of transparent or evidence-based comparisons concerning alternative offshore locations, development scales, or design configurations. The application does not establish that the developer has genuinely considered placing turbines further offshore, where potential visual, ecological, and coastal impacts could be mitigated. Considering the sensitivity of the West Lewis coastline, along with the critical importance of proximity to shore in assessing impact, the lack of such an analysis hampers any conclusion that the proposed siting represents the least damaging option.

Deficiencies are also apparent in the cable routing and landfall assessment. There is inadequate evidence suggesting that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors, including areas of cultural and spiritual significance like Barvas Cemetery. The lack of a clear avoidance strategy, combined with the absence of comparative analysis, indicates that mitigation by design has not been applied, leading to an over-reliance on post-design mitigation measures.

Consequently, the application does not convincingly demonstrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This reflects a failure to adhere to the established mitigation hierarchy, obstructing the competent authority's ability to determine whether less harmful and more suitable alternatives are available. Without a comprehensive assessment of alternatives, it is not possible to conclude that the proposal is sustainable or compliant with policy requirements.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally flawed, failing to deliver a comprehensive understanding of the ecological receptors in the West Lewis coastal environment, which is highly sensitive and biologically active. The baseline data provided is incomplete, and the methodologies used do not adequately capture the presence, behaviour, and habitat use of species. This inadequacy undermines the assessment's ability to furnish a solid evidential basis for evaluating potential impacts.

A critical gap exists concerning otters, classified as a European Protected Species, as

the application does not sufficiently recognise or assess their use of coastal areas for foraging and movement. The omission of their core foraging range and behavioural patterns means the potential impacts of construction-related disturbances, noise, and increased activity have not been thoroughly evaluated. This limitation casts doubt on any conclusions suggesting there would be no significant effects on this species.

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

Due to these methodological shortcomings, the assertions of negligible or non-significant effects rely on assumptions rather than robust evidence. The lack of sufficient baseline data also hampers a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty regarding the true scale of risks to marine species and 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 has not properly identified or assessed protected species. The uncertainty introduced prevents the dismissal of adverse effects beyond a reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these circumstances, granting consent would not be lawful.

In conclusion, the combination of incomplete baseline data, flawed methodologies, and unfounded conclusions leads to an assessment that lacks reliability. These deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species, culminating in the overarching determination that the application fails to provide a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment provided in the application is flawed, presenting significant gaps in evidence and internal contradictions that seriously undermine its conclusions. Key foraging areas and migratory pathways for seabird populations are located on the west coast of the Isle of Lewis, which is home to internationally important species that are already in decline. However, the application fails to adequately demonstrate, to the necessary evidential standard, that these species will not face adverse effects due to the proposed development. Critical issues such as displacement, collision risk, and habitat loss are not thoroughly evaluated within the assessment.

A notable inconsistency arises in the application, as the developer asserts that there will be no significant adverse effects while concurrently putting forth a Habitats

Regulations derogation case, which is only warranted when significant harm is anticipated. This contradiction raises concerns about the assessment's reliability and suggests that the conclusions drawn are not substantiated by the available evidence.

Moreover, the assessment does not sufficiently establish that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these vital feeding grounds has not been fully considered, and the dependence on modelling approaches brings added uncertainty, particularly for species experiencing severe decline like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality rates, particularly in light of incomplete baseline data and insufficient understanding of behavioural responses.

The proposed turbine locations are situated within a recognised migratory corridor, which introduces a significant risk by creating a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application fails to assess the long-term implications of sustained mortality within this corridor, as well as the potential impact on species with relatively small global populations.

From a regulatory viewpoint, the application does not meet the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory findings, along with data deficiencies and limitations in the modelling approach, indicates that the standard of beyond reasonable scientific doubt has not been satisfied. This invokes the precautionary principle and precludes a lawful conclusion in favour of consent.

Furthermore, the identified deficiencies represent a failure to comply with the National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to prove that internationally important seabird populations will not suffer adverse effects places the proposal in direct conflict with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposal under review demonstrates a fundamental inadequacy in the assessment of cultural heritage and community identity. It fails to recognise the West Lewis coastline as a living cultural landscape, where environment, language, tradition, and community are deeply interconnected. Rather than acknowledging the ongoing social, cultural, and spiritual functions of heritage within the community, the application adopts a reductive approach that treats heritage as isolated, static assets.

A significant shortcoming is evident in the treatment of culturally significant sites such as the cemeteries located at Dalmore, Bragar, and Barvas. These cemeteries are active burial and spiritual practice sites, yet they have been categorised as static features in

the assessment. This oversight neglects their continued use and meaning, as well as the development's impact on their setting. The resulting mischaracterisation leads to an incomplete evaluation of cultural effects and ignores the cemeteries' roles within community life.

Furthermore, the assessment neglects intangible cultural heritage aspects, including the Gaelic language, traditions, and the longstanding relationship between the community and the coastal environment. These elements are vital to the area's identity, yet they are entirely absent from the evaluation, representing a significant omission. Without incorporating these factors, the true cultural impact of the development cannot be understood.

Concerns regarding community rights and engagement are also paramount. The Gaelic-speaking population has a unique cultural identity that aligns with characteristics of an Indigenous People, but the absence of a Free, Prior and Informed Consent process undermines the legitimacy of the assessment. This lack of meaningful engagement fails to reflect 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, a statutory requirement under the Islands (Scotland) Act 2018. This omission precludes the competent authority from fulfilling its legal duty to evaluate the social, cultural, and economic impacts on the island community, preventing a lawful determination.

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

In summary, the combined failures to assess living heritage, intangible cultural value, community rights, and statutory obligations create a substantial evidential gap. The cultural impacts of the development remain inadequately assessed, and the application lacks a sufficient foundation for evaluating the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency regarding social impacts, health, and wellbeing in this application is significant and undermines the necessary evaluation process. While the developer has conducted a Social Impact Assessment that involved local residents through focus groups, the full report remains unpublished. This creates a serious evidential gap, hindering both public understanding and the competent authority's ability to assess the social risks identified in the developer’s own research.

Available summaries reveal that local residents are facing measurable stress, anxiety,

and concern due to the scale and proximity of the proposed development. These impacts are based on direct feedback from the community and are not mere speculation. However, without access to the complete assessment, it is impossible to scrutinise these findings fully, which limits the capacity to evaluate their significance in the decision-making process.

Additionally, there are indications that the proposal is viewed as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Unfortunately, these concerns have not been adequately included in the main application or afforded the necessary weight. The failure to disclose the complete Social Impact Assessment obscures the real human and social costs associated with the development.

This lack of transparency further complicates the Environmental Impact Assessment process. Understanding the social, economic, and health implications is vital for projects of this magnitude, especially when considering potential effects on community character and functioning. The application's omission of the full dataset results in an insufficient evidential basis to weigh the benefits against the harms.

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4 concerning health and wellbeing. Developments should promote positive health outcomes and avoid causing harm, yet the evidence available suggests that adverse effects already exist and have not been fully disclosed. Without the complete assessment, it cannot be shown that the application complies with this policy.

The procedural consequences of this situation are considerable. The competent authority is unable to perform a thorough socio-economic and health evaluation due to the absence of the full Social Impact Assessment. This gap represents a material omission in the application and fails to satisfy the evidential requirements set out by the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of landscape, seascape, and visual impacts is significantly inadequate and does not reflect the scale of change or the sensitivity of the local environment. The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and profound sense of remoteness. The introduction of large turbines near the shoreline would establish a continuous industrial presence that would fundamentally alter this character, leading to a permanent and irreversible transformation of the landscape.

The application does not sufficiently address the magnitude of this visual change. The size and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment fails to accurately convey this level of impact or its significance within such a sensitive landscape.

Moreover, there are methodological issues concerning the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not fully capture the most sensitive receptors or the worst-case scenarios, particularly regarding key cultural heritage sites and valuable landscapes. This raises concerns that the visual impact's magnitude may have been understated, thus compromising the reliability of the assessment.

Another notable deficiency is the lack of consideration for the interconnected relationship between landscape, seascape, and cultural heritage. Significant sites like the Calanais Standing Stones and other Scheduled Monuments are integrated within a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these heritage assets in isolation, ignoring their interdependence and resulting in an incomplete evaluation of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal contradicts National Planning Framework 4 concerning the protection of natural places and historic assets. The extent of change is at odds with the need to safeguard landscape character, visual amenity, and the setting of culturally significant sites. The lack of a comprehensive worst-case assessment further diminishes any assertion of policy compliance.

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal presents significant concerns regarding the incomplete assessment of construction and pollution risks, which lacks the necessary detail to evaluate potential environmental impacts. It involves extensive seabed preparation and installation activities in the high-energy Atlantic environment, yet there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans provided. Instead, the application depends on mitigation and contingency measures that are to be developed after consent, which hinders any meaningful evaluation of their sufficiency or effectiveness.

This reliance on unspecified future measures is particularly troubling due to the sensitivity of the surrounding environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and possible chemical or oil spills, it fails to outline adequate strategies for their prevention, control, or monitoring.

Moreover, there is uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. In the absence of robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological repercussions of these impacts. This uncertainty also extends to possible effects on marine species and habitats identified as sensitive in the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application obstructs the ability to evaluate whether suitable safeguards are established to address pollution incidents. This introduces procedural risks and diminishes the competent authority's capacity to assess environmental protection measures at the decision-making stage.

From a regulatory viewpoint, the postponement of essential environmental safeguards contradicts the requirements set out by the Environmental Impact Assessment regime. Significant effects and necessary mitigations must be evaluated prior to consent, and without this crucial information, a lawful determination cannot be achieved. Additionally, the application does not demonstrate adherence to policy requirements pertaining to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The proposal introduces considerable risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over an extended period is expected to cause disturbances over large distances,

impacting species such as dolphins. Concerns arise from the predicted disruption to a significant portion of the local bottlenose dolphin population; however, the application tends to downplay these effects without adequate supporting evidence.

An assessment of fisheries and marine life is critically lacking, as it does not provide a thorough evaluation of ecological or socio-economic impacts. The waters off the West Lewis coast sustain both a diverse marine ecosystem and an active fishing industry. Yet, the application fails to illustrate how these vital uses and habitats can be safeguarded or sustained without substantial disruption. There is a fundamental issue with the assumption that fishing activity can be displaced without consequences. The application offers no evidence that alternative fishing grounds are available, accessible, or capable of withstanding additional pressure. This omission is crucial, as displacing fishing could lead to overfishing in other areas and might result in broader economic repercussions for the local fleet. A clear and evidence-based assessment is necessary to comprehend the impacts on fisheries and livelihoods properly.

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is significantly inadequate and does not take into account the full range of impacts resulting from what constitutes a single integrated project. The offshore turbines and the onshore works are inherently linked; however, they are evaluated separately. This results in a disjointed approach that conceals the actual magnitude of the environmental and socio-economic

consequences.

Included in the onshore components are cabling across protected moorland, the construction of a substation near Stornoway, and related access infrastructure traversing sensitive landscapes. These activities necessitate excavation in areas of deep peat, particularly within Barvas Moor, an important carbon store and ecologically delicate habitat. The application fails to deliver a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

The exclusion or postponement of the assessment of onshore impacts impedes a proper evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all parts of a project must be considered collectively; nevertheless, the division of offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities remain poorly understood.

There are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected under policy. The application does not indicate that the impacts on these habitats have been fully evaluated or that suitable avoidance measures have been implemented, resulting in a clear evidential gap concerning biodiversity protection.

Concerns regarding carbon balance are also raised by the proposal. Disturbance of peatland releases stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy initiatives. The application does not sufficiently tackle this matter or demonstrate that the overall carbon balance is beneficial.

Furthermore, the routing of infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. The application lacks evidence 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 inability to assess the project as a cohesive whole and demonstrate the protection of peatlands, habitats, and land use interests is at odds with the National Marine Plan and National Planning Framework 4. The failure to prove that impacts can be avoided or mitigated further weakens the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which play a crucial role in defining environmental quality, cultural identity, and tourism potential. The absence of an assessment regarding dark skies and nocturnal wildlife in the

Environmental Impact Assessment represents a significant gap. The proposal introduces permanent red aviation lighting that will be visible over long distances, resulting in a persistent and disruptive “wall of light” effect across the western horizon. This change would fundamentally alter the night-time landscape.

Moreover, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. The significance of dark skies in relation to the area’s identity and the emerging sector of astro-tourism cannot be overstated. Without proper assessment, this omission leaves a crucial void in understanding the landscape and environmental implications.

The lack of evaluation extends to the impacts on nocturnal wildlife, with no assessment of how artificial lighting may affect species like the Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel, all of which are susceptible to phototaxis, potentially leading to disorientation and a heightened risk of collisions. The application does not include any lighting impact assessment or phototaxis study, resulting in a failure to consider the effects of aviation lighting on these species and their potential mortality.

Compounding this issue is the reliance on daytime survey data in the ornithological assessment, which neglects to capture nocturnal activities and associated risks. Kittiwakes, which may forage or migrate during the night, are also at risk of disorientation from artificial lighting, yet this has not been assessed. The lack of site-specific night-time data creates a critical gap in understanding ecological impacts.

Without a thorough assessment of nocturnal effects, it is impossible to ascertain whether protected species or designated sites would face adverse impacts. The evidential standard necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and hindering a lawful determination.

From a policy perspective, this omission contradicts the National Planning Framework 4 regarding the protection of natural places and environmental quality. It further undermines the assessment of landscape and seascape impacts, as the night-time character is an essential component of the environment.

In summary, the absence of any assessment related to dark skies and nocturnal wildlife constitutes a significant evidential gap. The lack of baseline data, impact modelling, and species-specific analysis means the application is incomplete and cannot support a lawful determination.

TOURISM

The evaluation of tourism impacts is severely lacking and does not adequately address the economic and social ramifications for a vital sector of the Isle of Lewis economy. The viability of tourism relies heavily on the area’s wild coastline, near-pristine landscapes, dark skies, and the feeling of remoteness. Although 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 may influence visitor numbers, behaviours, or the overall economic contributions from tourism.

Significantly, tourism has experienced substantial growth, rising from £65 million in 2017 to over £81.5 million, supporting over 1,000 jobs and constituting up to 16% of the island's economy. However, the application does not simulate how the potential industrialisation of the seascape and degradation of environmental quality could affect Tourism Gross Value Added or broader economic resilience. Without this analysis, it remains impossible to ascertain whether the proposed development would yield a net economic benefit or jeopardise a flourishing sector.

Additionally, the assessment neglects the critical role environmental quality plays in enhancing tourism, including the significance of unspoilt landscapes and dark skies for visitor experiences and the burgeoning markets of nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this issue, creating a considerable gap in understanding the impacts on an acknowledged and expanding segment of the local economy.

In a context where the island community has limited economic diversification, the oversight in assessing tourism impacts presents broader risks for employment, local enterprises, and the sustainability of the community. The absence of a thorough Island Communities Impact Assessment indicates that these economic vulnerabilities have not been adequately evaluated, as mandated under the Islands (Scotland) Act 2018.

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

In summary, the collective failure to quantify tourism impacts, analyse environmental influences on visitor behaviour, and account for the island's economic dependencies leads to a significant evidential void. This gap hinders a thorough assessment of the economic effects and underscores the conclusion that the application is inadequate.

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

Our island, my home, is loved so very much for its beauty and landscapes. To ruin that with objects that are unwanted by the local population, is simply just wrong. I

understand that renewable energy would be improved, however our island does not need to be obstructed by wind farms, which will in turn affect both the island socially through local population/unhappiness of locals, or through tourism - which we rely so heavily upon. But we also must think of the sea life, where these wind farms potentially cause harm towards animals and their habitats.
God made the world in the way He saw was good, and only good. He has instructed us to love His creation and to look after it as His ambassadors. I believe we are selfish to obstruct the world that He created - full of beauty and reflecting His glory

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: 133939BC

Member of the public 1385

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

Dear Sir/Madam

This representation constitutes a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The development is situated off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns regarding the compatibility of the proposal with statutory requirements, national policy, and the principles of sustainable development are fundamental, given the scale, proximity, and design of the project.

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The West Lewis coastal environment is a highly sensitive and biologically active marine system, yet the assessment of marine ecology and protected species is materially

deficient. It does not deliver a complete or reliable understanding of the ecological receptors in this area. The baseline data remains incomplete, and the methodologies employed fail to adequately capture the presence, behaviour, and habitat use of various species. Consequently, the assessment lacks a solid evidential basis for evaluating the potential impacts.

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

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development raises significant concerns regarding its reliability and adherence to regulatory standards. It indicates that the west coast of the Isle of Lewis, home to internationally important seabird populations, is not adequately protected. Many of these species are already in decline, yet the application fails to

provide sufficient evidence that their interests will not be adversely impacted. The turbines are sited within vital foraging areas and migratory pathways, yet the implications of displacement, collision risk, and habitat loss remain poorly evaluated.

A critical inconsistency undermines the application, as the developer asserts there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation. Such a case is only warranted when significant harm is anticipated, calling the credibility of the assessment into question. Furthermore, the application does not convincingly demonstrate that seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, will be unaffected. The importance of these feeding grounds is inadequately addressed, and reliance on modelling approaches adds uncertainty, especially for vulnerable species like Kittiwakes and Fulmars. The methodologies employed likely underestimate mortality, particularly in light of incomplete baseline data and a lack of understanding of behavioural responses.

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment concerning community identity and cultural heritage in relation to the West Lewis coastline is fundamentally flawed. This area is a living cultural landscape where environment, language, tradition, and community are interconnected, yet the application treats heritage as isolated and static, failing to acknowledge its social, cultural, and spiritual significance within the community.

A major shortcoming is evident in how culturally significant sites, particularly the

cemeteries at Dalmore, Bragar, and Barvas, are addressed. These locations serve as active burial sites and places of spiritual practice, but the assessment categorises them merely as static features, neglecting their ongoing use and the development's potential impact on their surroundings. This mischaracterisation leads to an incomplete evaluation of cultural effects and overlooks their importance in community life.

Additionally, the assessment omits intangible cultural heritage elements, including the Gaelic language and local traditions, as well as the community's long-standing relationship with the coastal environment. These aspects are crucial to the area's identity and their absence represents a significant oversight. The lack of consideration for these factors means that the cultural implications of the development are inadequately understood.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity with characteristics recognised for Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the assessment's legitimacy and fails to comply with established participatory principles regarding decisions that affect cultural and environmental interests.

Moreover, there is a critical procedural gap due to the absence of a compliant Island Communities Impact Assessment, a statutory requirement established by the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to fulfil its legal obligation to assess the social, cultural, and economic impacts on the island community, rendering the determination unlawful.

These deficiencies also have policy implications, as they put the proposal in direct conflict with National Planning Framework 4, especially regarding the protection of historic assets and places. The neglect to consider both tangible and intangible heritage, along with living cultural practices, deviates significantly from policy requirements.

In summary, the failure to adequately assess living heritage, intangible cultural value, community rights, and statutory obligations results in a considerable evidential gap. The cultural impacts of the development remain unassessed, and the application lacks a solid foundation for determining the true cultural cost associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of publication of the full Social Impact Assessment is a critical issue that has significant implications for the evaluation of this development proposal. Although the developer engaged local residents through focus groups, the absence of the complete report creates a substantial evidential gap, hindering both public understanding and the competent authority's ability to assess the identified social risks.

Available summaries reveal that residents are currently experiencing measurable

stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts stem from direct engagement with the community, making them grounded in reality rather than speculative. However, without access to the full assessment, proper scrutiny of these findings is impossible, thus limiting the capacity to evaluate their significance in the decision-making process.

Moreover, the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" noted in the developer's own findings. Nonetheless, these serious concerns have not been adequately integrated into the main application or given appropriate consideration. The decision to withhold the full Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health impacts is vital for projects of this magnitude, especially when community character and functionality may be at stake. By failing to provide the complete dataset, the application does not offer a thorough evidential basis for weighing the benefits against the potential harms.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 regarding health and wellbeing. Developments are expected to promote positive health outcomes and mitigate harm, yet the evidence available points to existing adverse effects that remain undisclosed. Without the full assessment, it is impossible to confirm compliance with this policy.

The procedural ramifications are considerable. The competent authority is unable to conduct a rigorous socio-economic and health evaluation in the absence of the full Social Impact Assessment. This constitutes a material omission and a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, alongside documented existing adverse impacts, renders the assessment inadequate and unreliable. This situation precludes a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and strong sense of remoteness. The introduction of large-scale turbines near the shoreline would establish a continuous industrial presence that fundamentally alters this character, leading to a permanent and irreversible transformation of the landscape. The assessment conducted does not accurately reflect the magnitude of this visual change, with the scale and proximity of the turbines set to dominate views from residential areas, historic sites, and popular coastal locations. This would have a detrimental impact on visual amenity, eroding the defining qualities of naturalness and remoteness, while failing to convey the significance of such impacts within this sensitive landscape context.

Concerns regarding the methodology used for selecting and presenting visual viewpoints are also evident. Evidence indicates that these viewpoints may inadequately 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 casts doubt on the assessment's reliability.

Moreover, the assessment neglects the interconnected relationship between landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments form part of a broader landscape, connected visually and spatially to the Atlantic horizon. By treating these assets in isolation, the assessment fails to recognise their interdependence, resulting in an incomplete evaluation of the impacts on their setting and cultural significance. The industrialisation of the seascape would disrupt these relationships, fundamentally altering the context in which these heritage assets are experienced and severing their connection to the natural horizon. This signifies not merely a visual impact but also a broader cultural and spatial harm that has not been properly considered in the application.

From a policy standpoint, the proposal is at odds with National Planning Framework 4 regarding the safeguarding of natural places and historic assets. The extent of the proposed changes contradicts 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 undermines claims of policy compliance.

Finally, it is apparent that the identified impacts cannot be effectively mitigated. Due to the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. Consequently, the resulting changes are fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation measures. Overall, the assessment fails to accurately depict the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage, thereby preventing a reliable evaluation and reinforcing the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

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

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

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

There remains considerable uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is not feasible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also applies to potential effects on sensitive marine species and habitats identified in the broader assessment.

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

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

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

FISHERIES AND MARINE LIFE

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

An assessment of fisheries and marine life is critically lacking, as it does not provide a thorough evaluation of ecological or socio-economic impacts. The waters off the West Lewis coast sustain both a diverse marine ecosystem and an active fishing industry. Yet, the application fails to illustrate how these vital uses and habitats can be safeguarded or sustained without substantial disruption. There is a fundamental issue with the assumption that fishing activity can be displaced without consequences. The application offers no evidence that alternative fishing grounds are available,

accessible, or capable of withstanding additional pressure. This omission is crucial, as displacing fishing could lead to overfishing in other areas and might result in broader economic repercussions for the local fleet. A clear and evidence-based assessment is necessary to comprehend the impacts on fisheries and livelihoods properly.

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is fundamentally incomplete, failing to recognise the interconnected nature of the offshore turbines and the onshore works. These components are assessed independently, leading to a fragmented evaluation that conceals the true extent of environmental and socio-economic consequences.

The onshore project includes the construction of a substation near Stornoway, cabling across protected moorland, and additional access infrastructure through sensitive landscapes. Notably, 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 thorough assessment of these impacts means that the overall environmental footprint of the project remains unclear.

By neglecting the assessment of onshore impacts, the application hinders the proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be evaluated together; however, the distinction between offshore and onshore elements prevents a full understanding of the combined

effects on peatlands, habitats, and local communities.

There are significant risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected under policy. The application does not adequately demonstrate that the impacts on these habitats have been fully assessed or that appropriate avoidance measures have been implemented, resulting in a significant evidential gap regarding biodiversity protection.

Concerns also arise regarding carbon balance, as the disturbance of peatland can release stored carbon, potentially resulting in a carbon debt that contradicts the aims of renewable energy development. The application falls short in addressing this issue and fails to 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. There is insufficient evidence that necessary consents or processes have been initiated, which brings into question the deliverability and lawful implementation of the project.

From a policy standpoint, the failure to assess the project as a cohesive whole and to demonstrate protection for peatlands, habitats, and land use interests contradicts the principles outlined in the National Marine Plan and the 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, coupled with the absence of a comprehensive assessment and the lack of evidence regarding environmental and land use impacts, renders this section of the application incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal fails to include an assessment of dark skies and nocturnal wildlife, which represents a significant oversight in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are integral to the environmental quality, cultural identity, and tourism appeal of the area. The introduction of permanent red aviation lighting that can be seen from great distances would create a persistent and intrusive “wall of light” effect on the western horizon, fundamentally changing the night-time landscape.

This application does not evaluate how the lighting will affect visual amenity, landscape character, or the experiences of both residents and visitors. The absence of this analysis is particularly concerning given the value of dark skies to the local identity and the growing interest in tourism sectors like astro-tourism. The neglect to consider these factors results in a clear shortfall in the environmental and landscape assessment.

Moreover, there is no examination of the impact on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly

affected by artificial lighting due to their phototactic responses, which can result in disorientation and heightened risks of collision. The application does not provide any lighting impact assessment or phototaxis study, neglecting to evaluate the potential consequences of aviation lighting on these species or the risk of increased mortality.

The reliance on daytime survey data in the ornithological assessment exacerbates this issue, as it does not account for nocturnal behaviours or associated hazards. Other species, like Kittiwakes, which may engage in foraging or migration at night, are also susceptible to disorientation from artificial lighting, but this risk remains unassessed. The lack of site-specific night-time data creates a substantial gap in understanding ecological impacts.

Without a thorough evaluation of nocturnal impacts, it becomes impossible to ascertain whether protected species or designated sites could be negatively affected. The necessary evidential standard to rule out adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and impeding lawful determination.

From a policy standpoint, this omission is at odds with the National Planning Framework 4, which pertains to the safeguarding of natural areas and environmental quality. It also undermines the overall analysis of landscape and seascape impacts, as the character of night-time environments is a vital component of the ecological setting.

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

TOURISM

Tourism has become a cornerstone of the Isle of Lewis economy, growing significantly from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the local economy. However, the assessment of tourism impacts related to the proposed development is severely lacking. It fails to evaluate the economic and social consequences for this vital sector, which is fundamentally dependent on the area's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness. While the application acknowledges that 86% of visitors are attracted by scenery, it does not provide a quantified assessment of how large-scale offshore infrastructure would affect visitor numbers, behaviour, or the overall economic contribution.

The omission of a thorough analysis regarding the role of environmental quality in tourism is particularly alarming. Unspoiled landscapes and dark skies are crucial to visitor experience and the growth of emerging markets such as nature-based tourism and astro-tourism. The failure to include a Dark Skies Assessment further underscores this deficiency, leading to a significant gap in understanding the potential impacts on a recognised and growing part of the local economy.

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

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm highlights significant shortcomings in meeting the principles of sustainable development as established by statutory obligations, national policy, and necessary evidential standards. It revisits core issues that were the basis for the refusal of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. This current application, despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, still fails to adequately address these concerns.

A comprehensive and reliable evidential foundation for determination is notably lacking in the application. There are critical deficiencies in baseline data, reliance on an undefined design envelope, unspecified mitigation measures, and a failure to address key impact pathways such as nocturnal wildlife, onshore infrastructure, and tourism effects. As a result, the Environmental Impact Assessment is incomplete, preventing a thorough understanding of the likely significant effects or any residual impacts.

Moreover, the application reveals clear procedural deficiencies. The lack of a compliant Island Communities Impact Assessment represents a failure to adhere to the statutory obligations under the Islands (Scotland) Act 2018. Additionally, the failure to provide a full Social Impact Assessment constitutes a material omission, which obstructs the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience. These failings are sufficient to render the application unsuitable for determination.

The proposal directly conflicts with National Planning Framework 4, as it does not adequately demonstrate the protection of biodiversity, natural environments, and cultural heritage. Furthermore, it fails to show that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, particularly due to the

absence of tourism impact modelling. The cumulative impact of both offshore and onshore elements has not been properly assessed, thereby 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 either incomplete or internally inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been fulfilled, which engages the precautionary principle and prevents a lawful conclusion regarding the acceptability of impacts.

Additionally, the proposal would induce significant and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual relationships, and impacts on tourism represent permanent alterations that cannot be mitigated to an acceptable degree.

In conclusion, the application is procedurally and substantively unfit for determination. The extent of information deficiencies, combined with policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. It is imperative that the competent authority either refuse consent on these grounds or utilise the relevant regulatory provisions to mandate the submission of the missing information. Therefore, I formally request that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Additional Comments

The west side of our island, is home the majority of our local cultural heritage site. Some of which are the best preserved in Scotland. Thousands of tourists travel around that loop visiting these sights everyday single day during the summer months.

This planned eyesore is an absolute disgrace, environmentally, culturally and aesthetically. Local people will not benefit from these proposed wind turbines. Turbines which we never wanted or asked for! We will only face the consequences of this decision is it goes ahead. Consequences which will be detrimental for generations to come.

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: 4C27CD70

Member of the public 1386

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under the marine licensing and Environmental Impact Assessment frameworks. The objection arises from a thorough review of the Environmental Impact Assessment Report and its accompanying documentation, revealing significant deficiencies in planning, environmental impact, cultural considerations, and procedural aspects. The development site is situated off the west coast of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, nearly untouched environment, and robust cultural heritage. Concerns about the scale, proximity, and design of the proposed wind farm raise serious questions regarding its alignment with statutory obligations, national policies, and the principles of sustainable development.

The submission lacks a comprehensive evidential basis necessary for a lawful decision. There is a notable absence of critical environmental data, while the baseline information provided is both limited and inconsistent. Many important elements of the proposal remain undefined. The flexible design framework employed makes it difficult to ascertain potential significant effects, and the reliance on unspecified mitigation measures renders their effectiveness impossible to evaluate. Consequently, the documentation fails to facilitate a comprehensive understanding of the environmental, cultural, or community impacts involved, and assertions of negligible or non-significant effects lack robust supporting evidence.

There are evident and substantial conflicts with policy. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regulations, and National Planning Framework 4, especially concerning biodiversity, natural habitats, cultural heritage, and health and wellbeing. It has not demonstrated adherence to national requirements aimed at protecting biodiversity, climate considerations, and environmental integrity. These conflicts relate directly to the statutory tests necessary for consent and weaken the capacity of the competent authority to determine the development's acceptability from a policy standpoint.

The unprecedented scale of the proposal in this particular location poses additional challenges, with large turbines positioned alarmingly close to the shoreline, raising significant issues regarding landscape capacity, visual dominance, and overall environmental impact. Collectively, the insufficient information provided, reliance on undefined mitigation strategies, evidential shortcomings, and clear non-compliance with policy underscore that the application is incomplete and fails to support a lawful determination. In light of these issues, the precautionary principle is paramount.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies, failing to provide a full, transparent, or reliable overview of the potential environmental effects associated with the proposal. The absence of a defined Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations, generates considerable uncertainty and obstructs a consistent application of a worst-case scenario approach. This lack of clarity undermines the assessment's integrity and inhibits both the public and the competent authority from grasping the true extent of the environmental impacts that may arise from the development.

The application is predicated on unspecified mitigation measures, monitoring strategies, and management plans that remain ill-defined at this stage. Consequently, consent is sought under the premise that any resulting environmental harm will be managed post-consent. This approach precludes meaningful evaluation of these measures' effectiveness and the assessment of residual impacts. Such a deferral of crucial information to stages following consent is procedurally unacceptable and contravenes the intent of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation strategies be clearly established before determination.

Moreover, there are substantial evidential deficiencies within the assessment, including notable gaps in baseline data, limitations in methodology, and an overreliance on assumptions rather than site-specific evidence. This situation fosters uncertainty concerning the scale and significance of impacts, particularly where conclusions have been drawn about negligible or non-significant effects without robust supporting data. The lack of adequate information obscures a clear understanding of cumulative and worst-case impacts, thereby introducing scientific uncertainties that are inconsistent with statutory requirements.

As a result, the application does not fulfil the evidential threshold necessary under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This circumstance invokes the precautionary principle, especially in regards to protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate alignment with National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it is not evident that impacts have been thoroughly assessed or that suitable safeguards have been established.

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

ASSESSMENT OF ALTERNATIVES

The application presents significant deficiencies in the assessment of alternatives, which fails to meet the statutory requirements of the Environmental Impact

Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives based on their environmental effects, it provides only a narrative account of project evolution. This methodology does not adequately demonstrate that less harmful options have been properly identified, assessed, and selected in favour of more damaging solutions.

Furthermore, there is a lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, and design configurations. Notably, the application does not show that the developer has genuinely considered placing turbines further offshore, where visual, ecological, and coastal impacts would likely be diminished. Given the sensitivity of the West Lewis coastline and the critical significance of proximity to the shore in determining impact, the absence of such analysis prevents any conclusion that the proposed siting is the least damaging option available.

The issues are also evident in the assessment of cable routing and landfall, where there is inadequate evidence to suggest that alternative routes have been properly explored to avoid or mitigate impacts on sensitive receptors. This includes locations of cultural and spiritual importance, such as Barvas Cemetery. The lack of a clear avoidance strategy, coupled with the absence of comparative analysis, indicates that mitigation by design has not been implemented, resulting in reliance on post-design mitigation measures.

Consequently, the application fails to demonstrate that environmental harm has been minimised through effective site selection, layout, and infrastructure routing. This represents a significant departure from the established mitigation hierarchy, thereby preventing the competent authority from determining whether more suitable and less harmful alternatives exist. Without a thorough assessment of alternatives, it cannot be concluded that the proposal is sustainable or compliant with relevant policy.

From a policy standpoint, this shortcoming undermines adherence to National Planning Framework 4, particularly regarding the protection of natural places, cultural heritage, and community well-being. The failure to provide a structured and comparative assessment is a material omission that ultimately indicates that the application has not been adequately evaluated and does not support 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.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, exhibiting significant gaps in evidence and internal inconsistencies that seriously undermine 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 sufficiently demonstrate that these species will not suffer adverse effects. The development site is situated within key foraging areas and migratory pathways, yet the implications of displacement, collision risk, and habitat loss are not adequately evaluated.

There exists a fundamental contradiction within the application, as the developer concludes that there will be no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is typically only needed when significant harm is anticipated. This inconsistency raises serious doubts about the

reliability of the assessment and suggests that the conclusions drawn are not substantiated by the underlying evidence.

Moreover, the assessment lacks sufficient evidence to confirm that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these vital feeding grounds is not fully recognised, and the reliance on modelling approaches introduces uncertainty, particularly for species in steep decline like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, especially given incomplete baseline data and a lack of understanding of behavioural responses.

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

From a regulatory standpoint, the application does not satisfy the evidential threshold necessary to confirm no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data gaps and modelling limitations, means that the standard of beyond reasonable scientific doubt has not been met. This engages the precautionary principle, thereby precluding a lawful conclusion in favour of consent.

The identified deficiencies also reflect non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected directly conflicts with national policy.

Overall, the assessment is unreliable due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. These issues hinder a thorough evaluation of impacts and contribute to the conclusion that the application does not meet the statutory requirements necessary for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is a living cultural landscape where environment, language, tradition, and community are intrinsically connected. However, the assessment of cultural heritage and community identity is fundamentally inadequate, failing to recognise this complexity. It adopts a reductive approach, treating heritage as isolated, static assets without acknowledging their ongoing social, cultural, and spiritual functions within the community.

A significant shortcoming lies in the treatment of culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet they are mistakenly categorised as static features. This mischaracterisation fails to take into account their continued use and meaning,

neglecting the impacts of development on their setting. As a result, the evaluation of cultural effects remains incomplete, overlooking their vital role in community life.

Moreover, the assessment fails to address intangible cultural heritage, such as the Gaelic language and traditions, which are essential to the area's identity. This omission significantly diminishes the understanding of the cultural impact of the development. The Gaelic-speaking population, recognised as an Indigenous People, possesses distinct cultural characteristics, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the legitimacy of the assessment, disregarding established principles of participation in decisions affecting cultural and environmental interests.

Additionally, the absence of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018, represents a critical procedural failure. Without this assessment, the competent authority is unable to fulfil its legal duty to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders a lawful determination impossible.

From a policy standpoint, these deficiencies place the proposal in direct conflict with National Planning Framework 4, especially concerning the protection of historic assets and places. The failure to consider both tangible and intangible heritage, along with the recognition of living cultural practices, clearly departs from policy requirements. Consequently, the combined failure to assess living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential gap. The application does not provide a sufficient basis for understanding the true cultural cost of the proposal, and the cultural impacts of the development have not been adequately assessed.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal lacks transparency and depth in assessing social impacts, health, and wellbeing, which is critical for a lawful evaluation. Although the developer commissioned a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This absence signifies a notable evidential gap, hindering both public insight and the competent authority's understanding of the social risks identified in the developer's own research.

Summaries suggest that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts arise from direct community engagement and are not speculative in nature. However, without access to the complete assessment, there is limited capacity for proper scrutiny of these findings, which in turn restricts the evaluation of their significance in the decision-making process.

Furthermore, there is clear evidence indicating that the proposal is viewed as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer’s findings. Unfortunately, these impacts have not been thoroughly integrated into the

main application, nor have they received the weight they warrant. The failure to disclose the full Social Impact Assessment obscures the actual human and social costs associated with the development.

This lack of transparency undermines the Environmental Impact Assessment process. An exhaustive understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functionality are at stake. By withholding the full dataset, the application does not provide a complete evidential basis necessary for weighing benefits against potential harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Developments should promote positive health outcomes and mitigate harm, yet the evidence at hand reveals adverse effects that remain undisclosed. Without the full assessment, compliance with this policy cannot be validated.

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

In summary, the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing adverse effects, renders the assessment inadequate and unreliable. This situation obstructs a lawful determination and reinforces the notion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment presented fails to adequately reflect the sensitivity of the environment and the scale of change anticipated. The West Lewis coastline is characterised by its undeveloped nature, open Atlantic horizon, and a profound sense of remoteness. The installation of large-scale turbines in close proximity to the shoreline would establish a dominant industrial presence, which would fundamentally alter this unique character, resulting in a permanent and irreversible transformation of the landscape.

The proposal inadequately represents the magnitude of visual change. Given the scale and proximity of the turbines, they would overwhelmingly dominate views from residential areas, historic sites, and popular coastal locations. This would have a direct impact on visual amenity, significantly eroding the qualities of naturalness and remoteness. The assessment does not effectively convey the true level of impact or its significance within such a sensitive landscape.

Methodological flaws also arise concerning the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not fully represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural

heritage sites and high-value landscapes. This raises concerns that the visual impact magnitude has been understated, thus compromising the reliability of the assessment.

Moreover, the assessment neglects to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Prominent sites like the Calanais Standing Stones and other Scheduled Monuments are part of a larger landscape setting that is visually and spatially linked to the Atlantic horizon. By treating these as isolated assets, the assessment fails to acknowledge their interdependence, leading to an incomplete evaluation of impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would sever these crucial relationships, altering the context in which heritage assets are experienced and disrupting their connection to the natural horizon. This represents a significant visual impact and broader cultural and spatial harm that has not been adequately assessed within the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, particularly concerning the protection of natural places and historic assets. The extent of change proposed is incompatible with the requirements to safeguard landscape character, visual amenity, and the setting of culturally significant sites. The lack of a robust worst-case assessment further calls into question the proposal's compliance with policy.

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

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

CONSTRUCTION AND POLLUTION RISKS

The lack of comprehensive detail in the assessment of construction and pollution risks is alarming, as it fails to provide the necessary information to evaluate potential environmental effects. The proposal involves significant seabed preparation and installation activities within a high-energy Atlantic setting, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are set to be formulated after consent is granted, which obstructs any meaningful evaluation of their potential adequacy or effectiveness.

This approach is particularly troubling 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. Although the

application acknowledges risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it falls short of providing adequate detail on preventive, control, or monitoring measures.

Further compounding these issues is the uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without rigorous modelling and clearly articulated 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 that have already been identified as sensitive within the broader assessment.

Moreover, the absence of detailed emergency response procedures intensifies these concerns. By postponing contingency planning until after consent has been granted, the application inhibits a proper evaluation of whether sufficient safeguards are in place to handle pollution incidents. This introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures before making a determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements established by the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be evaluated prior to consent; when such information is absent, a lawful determination cannot be achieved. The application does not demonstrate compliance with policy requirements regarding environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

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

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

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

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

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an evaluation regarding dark skies and nocturnal wildlife is a significant oversight in the Environmental Impact Assessment. The West Lewis coastline boasts 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 will be visible over long distances, is set to create a continuous and intrusive “wall of light” effect across the western horizon, fundamentally altering the night-time environment.

Furthermore, the application does not consider the impact this lighting would have on visual amenity, landscape character, or the experience of both residents and visitors. This lack of assessment is particularly concerning, given the critical role that dark skies play in the area’s identity and in emerging sectors like astro-tourism. The failure to address these impacts results in a notable gap in the landscape and environmental

evaluation.

Equally alarming is the neglect of potential impacts 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 may cause disorientation and elevate the risk of collision. The application omits any lighting impact assessment or phototaxis study, failing to evaluate how aviation lighting could affect these species or increase mortality rates.

This issue is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which does not adequately reflect nocturnal activity or associated risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been assessed. The lack of site-specific night-time data creates a substantial gap in comprehending ecological impacts.

Without a thorough assessment of nocturnal effects, it is impossible to ascertain whether protected species or designated sites might be negatively impacted. The required evidential standard to confidently exclude adverse effects cannot be achieved, invoking the precautionary principle and preventing a lawful determination.

From a policy standpoint, these omissions are in conflict with National Planning Framework 4 regarding the protection of natural places and environmental quality. They also diminish the overall evaluation of landscape and seascape impacts, as the character of the night-time environment is a crucial element of the landscape.

In conclusion, the failure to assess dark skies and nocturnal wildlife represents a substantial evidential gap. The lack of baseline data, impact modelling, and species-specific analysis means the application is incomplete and cannot support a lawful determination.

TOURISM

The evaluation of tourism impacts within the application is severely lacking and does not adequately assess the economic and social repercussions for a critical sector of the Isle of Lewis economy. Tourism relies heavily on the region's wild coastline, near-pristine landscapes, dark skies, and the sense of remoteness they provide. While the application notes that 86% of visitors are attracted by the scenery, it fails to deliver a quantified analysis of how large-scale offshore infrastructure could influence visitor numbers, behaviour, or the overall economic contribution of tourism.

The tourism sector has experienced considerable growth, with revenue rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and comprising up to 16% of the island's economy. Nonetheless, the proposal does not consider how the industrialisation of the seascape and degradation of environmental quality may affect Tourism Gross Value Added or the broader economic resilience of the area. Without such modelling, it is impossible to ascertain whether the development would

provide a net economic benefit or adversely impact a well-established and expanding sector.

Furthermore, the assessment neglects to examine the significance of environmental quality for tourism, particularly regarding the value of unspoiled landscapes and dark skies to the visitor experience. This is especially relevant for growing sectors such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, resulting in a considerable shortfall in understanding the implications for an acknowledged and emerging facet of the local economy.

Considering that the island community possesses limited economic diversity, the oversight in assessing tourism impacts carries broader consequences for employment, local businesses, and the sustainability of the community. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been properly evaluated as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly regarding economic impact and the necessity to illustrate net benefit. It also contradicts strategic objectives that highlight tourism as a priority growth sector and fails to present sufficient evidence for the competent authority to analyse the economic ramifications of the proposal.

In summary, the collective shortcomings in quantifying tourism impacts, evaluating environmental factors influencing visitor behaviour, and acknowledging the island's economic dependency create a significant evidential gap. This inhibits a comprehensive assessment of economic effects and leads to the conclusion that the application remains incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development, particularly when evaluated against statutory duties, national policy, and evidential standards. This application mirrors the critical issues that led to the rejection of the Lewis Wind Power proposal in 2008, wherein the unacceptable scale of industrialisation was a decisive factor. Despite being submitted under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application lacks a complete and reliable evidential foundation necessary for informed determination.

There are significant deficiencies in the baseline data provided, and the continued use of an undefined design envelope raises concerns. The reliance on unspecified mitigation measures and the failure to address key impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism, render the Environmental Impact Assessment inadequate. This lack of completeness prevents a thorough understanding of likely significant effects or any residual impacts.

The procedural failures are evident, particularly the absence of a compliant Island Communities Impact Assessment, which breaches statutory duties under the Islands (Scotland) Act 2018. Furthermore, the failure to disclose a complete Social Impact Assessment constitutes a material omission, obstructing the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These shortcomings are sufficient to deem the application unfit for determination.

In direct violation of National Planning Framework 4, the proposal fails to protect biodiversity, natural places, and cultural heritage. It does not demonstrate that health and wellbeing impacts are acceptable, nor does it provide evidence of a net economic benefit due to the lack of tourism impact modelling. The cumulative impacts of both offshore and onshore elements have not been adequately assessed, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

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

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

In summary, the application is procedurally and substantively unfit for determination. The extensive information deficiencies, alongside policy conflicts and unresolved environmental risks, hinder a lawful and evidence-based decision. It is imperative that the competent authority either refuses consent based on these grounds or invokes the necessary regulatory provisions to compel the submission of the missing information.

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

Additional Comments

oppose the proposed offshore wind development on the grounds of its unacceptable risks to Scotland’s internationally important marine environment, bird populations, and internationally renowned dark skies.

The developers of N4 have already submitted an EPS & Basking Shark Risk Assessment to Marine Scotland (22 Feb 2023), which acknowledges that geophysical and geotechnical surveys risk disturbance and potential injury to European Protected Species—including minke whales, harbour porpoises, common and bottlenose dolphins, grey seals, and basking sharks. These are not minor concerns but

fundamental risks to protected wildlife.

Government proposals in the draft updated Sectoral Marine Plan rely heavily on aspirational phrases such as “encouragement of naturepositive development” and “optimisation of layouts.” These are principles, not enforceable safeguards. Unless binding legal conditions are attached, they do not guarantee protection. Without enforceability, “naturepositive” is little more than a slogan.

Our Marine Life

This proposed development lies in waters that are not empty but among the richest in Europe for marine biodiversity. Decades of surveys by the Hebridean Whale & Dolphin Trust and NatureScot confirm at least 23 species of whales, dolphins, and porpoises frequent these seas, along with basking sharks, wild Atlantic salmon, puffins, gannets, guillemots, seals, and even the occasional leatherback turtle.

Harbour porpoises and grey seals are present yearround, while minke and humpback whales migrate here in summer to feed. Fin and sperm whales occasionally pass through. Scottish Ministers’ own Scoping Opinion for Spiorad na Mara (29 May 2024) notes stakeholder concerns that shortterm datasets underestimate yearround marine mammal presence. Longterm monitoring makes it clear that these waters are essential feeding and migration corridors.

The Risk to Seabirds and Migrating Birds

Equally grave are the risks to Scotland’s seabirds and migratory birds. The Hebrides are globally significant for seabird populations, including puffins, gannets, guillemots, razorbills, kittiwakes, and storm petrels. These species rely on these waters for feeding and breeding. Offshore wind turbines present a lethal hazard through:

Collision risk: Migrating birds and seabirds travelling to and from feeding grounds are at direct risk of collision with rotating blades. Studies elsewhere show thousands of birds can be killed annually at large offshore wind sites.
Displacement: Even without collisions, largescale turbine arrays displace birds from traditional feeding areas, reducing survival rates for species already under pressure from climate change and prey shortages.
Barrier effects: Migratory birds crossing these waters will face industrialscale arrays forming barriers along their flyways. This increases energy expenditure, reduces breeding success, and adds to cumulative pressures across their migratory range.

Scotland has international obligations under the Birds Directive and Bern Convention to protect these species. Placing offshore turbines in one of Europe’s most important avian corridors is fundamentally incompatible with these duties.

Light Pollution and the Loss of Dark Skies

Another overlooked but serious consequence is light pollution. Offshore wind farms require constant navigation lighting, red aviation lights, and operational illumination. In an area currently celebrated for its pristine dark skies—where residents and visitors can experience unspoiled starlight, the Milky Way, and even the Northern Lights—the intrusion of industrialscale lighting would permanently destroy this natural heritage.

Wildlife impacts: Artificial light at night disorients seabirds, especially nocturnal migrants like shearwaters and petrels. It increases collision risk and causes birds to circle turbines until exhaustion.
Human and cultural impacts: The Outer Hebrides and west coast of Scotland are internationally recognised as some of the best places in Europe to see auroras and natural night skies. This tourism draw would be diminished, and local communities would permanently lose the rare experience of true darkness.
Landscape degradation: Once erected, turbines and their lighting alter the seascape not just in daylight but through the night. The character of the landscape would be irreversibly changed.

Simply put: once the night sky is lost to light pollution, it cannot be recovered.

Serious Risks from Offshore Wind Development

Offshore wind here would introduce multiple, cumulative pressures, including:

Underwater construction noise: Piledriving produces underwater sound levels up to 230 decibels, capable of causing injury and displacement to whales and dolphins.
Increased vessel traffic: 24/7 construction traffic raises the risk of ship strikes and chronic disturbance.
Electromagnetic fields from subsea cables: These can alter behaviour in sharks, skates, and migratory fish.
Loss of habitat: Turbine foundations, scour protection, and cable installation fragment or eliminate vital feeding and migration areas.
Bird and bat mortality: Collisions, displacement, and barrier effects threaten alreadydeclining populations of seabirds and migratory birds.
Light pollution: Permanent industrial lighting will disrupt ecosystems and destroy Scotland’s dark sky heritage.

Conclusion

No amount of “best practice” can offset the scale of risk posed by this development. The measures suggested by government and developers are not binding, not

enforceable, and not sufficient. They will not prevent the destruction of habitats, the death of seabirds and migratory birds, the displacement of marine life, or the permanent industrialisation of one of Scotland's most treasured wild seascapes.

Simply do not build them. Offshore wind here will:

Destroy marine and coastal habitat.
Kill thousands of seabirds and migrating birds.
Shatter the fragile balance of a globally significant marine ecosystem.
Permanently ruin the natural landscape, dark skies, and cultural heritage of these islands.

This area is too ecologically important, too biodiverse, and too fragile to sacrifice. The best and only environmental outcome is not to build N4 here at all.

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: C3C7325C

Member of the public 1387

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm. The objection is rooted in a review of the Environmental Impact Assessment Report and associated documentation, which reveals significant deficiencies in planning, environmental, cultural, and procedural areas. The proposed development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline and rich cultural identity, as well as its near-pristine environment.

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

Furthermore, there are notable conflicts with established policies. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not sufficiently demonstrate adherence to national requirements to protect biodiversity, climate interests, and environmental integrity. These issues directly impact the statutory tests required for consent and challenge the competent authority's ability to assess the development's acceptability within policy frameworks.

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies that compromise its reliability and transparency regarding the proposed development's environmental effects. A flexible Project Design Envelope, lacking specific turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This

uncertainty undermines the assessment's integrity, making it impossible to ascertain a worst-case scenario, thereby hindering both public understanding and the competent authority's evaluation of the true environmental impacts.

Furthermore, the application depends on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent based on the promise of addressing environmental harm at a later stage obstructs a thorough evaluation of effectiveness and the assessment of residual impacts. This postponement of essential information contravenes the procedural integrity of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies be clearly established before any determination is made.

There are also crucial evidential shortcomings, including insufficient baseline data, methodological limitations, and the reliance on assumptions rather than site-specific evidence. Such gaps result in uncertainty regarding the scale and significance of impacts, particularly when negligible or non-significant effects are asserted without robust data to support these conclusions. This lack of adequate information hampers a clear understanding of cumulative and worst-case impacts, leading to scientific uncertainties that fail to meet statutory requirements.

Consequently, the application does not satisfy the evidential threshold set by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Moreover, the proposal does not comply with National Planning Framework 4, which includes stipulations about biodiversity protection and environmental integrity, as it cannot be demonstrated that impacts have been thoroughly assessed or that suitable safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives presented in this application is fundamentally flawed and fails to adhere to the statutory requirements of the Environmental Impact Assessment regime. Instead of delivering a coherent and reasoned evaluation of realistic alternatives with regard to environmental impacts, the application merely recounts the project’s development history. This lack of structured analysis does not illustrate that less harmful alternatives have been adequately identified, assessed, and chosen over more damaging options.

Moreover, there is a distinct absence of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations.

Specifically, the application does not show that the developer has genuinely considered positioning the turbines further offshore, a move that could potentially mitigate visual, ecological, and coastal impacts. Considering the sensitivity of the West Lewis coastline, where proximity to shore is crucial in assessing impact, the lack of such an analysis undermines any assertion that the proposed siting is the least damaging option.

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species fails to provide a complete understanding of ecological receptors within the West Lewis coastal environment, which is a sensitive and biologically active marine system. The baseline data is incomplete, and the methodologies used do not adequately capture the presence, behaviour, and habitat use of species. Consequently, this lack of comprehensive data undermines the assessment's reliability for evaluating potential impacts.

A significant oversight is the inadequate recognition and assessment of otters, which are a European Protected Species. The application does not properly address their active use of coastal areas for foraging and movement. This omission means that the potential effects of construction disturbances, noise, and increased human activity have not been sufficiently evaluated, thereby questioning the conclusions drawn about the absence of significant effects on this species.

Moreover, the assessment of basking sharks is flawed due to a reliance on aerial

surveys, which introduce significant detection bias, particularly in Atlantic conditions. This methodology is likely to underestimate the presence of these sharks, especially when compared to established land-based observations that indicate frequent use of these waters. The failure to consider such critical data results in an incomplete baseline and detracts from the reliability of the conclusions presented.

The methodological shortcomings lead to assertions of negligible or non-significant effects based on assumptions rather than robust evidence. The lack of adequate baseline data also obstructs a meaningful assessment of cumulative and indirect impacts, including seasonal variations and interactions within the wider ecosystem. This contributes to uncertainty regarding the true extent 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 regime and the National Planning Framework 4, as it has not properly identified or assessed protected species. The uncertainties introduced prevent the exclusion of adverse effects beyond reasonable scientific doubt, thus necessitating the application of the precautionary principle. Given these conditions, lawful consent cannot be granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment presented within the application is fundamentally flawed, characterised by significant gaps in evidence and internal inconsistencies that compromise its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application does not adequately demonstrate to the necessary evidential standard that these species will remain unaffected. The proposed development is situated within critical foraging areas and migratory routes, yet the assessment fails to effectively evaluate the risks associated with displacement, collision, or habitat loss.

There exists a fundamental contradiction in the application, as the developer asserts that there will be no significant adverse effects while also advancing a Habitats Regulations derogation case, which is only relevant in instances where significant harm is anticipated. This inconsistency raises questions regarding the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the available evidence. Furthermore, the assessment lacks sufficient evidence to conclude that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not adequately acknowledged, and the reliance on modelling introduces uncertainty, particularly for declining species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate potential mortality, especially where baseline data is lacking and the

behavioural responses of these species are not fully understood.

The placement of turbines within a known migratory corridor poses an additional and considerable risk, effectively creating a barrier along a primary flight path for species migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term consequences of sustained mortality within this corridor or consider the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application fails to meet the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data deficiencies and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This invokes the precautionary principle, which precludes a lawful conclusion in support of consent. The identified deficiencies also demonstrate non-compliance with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to show that internationally significant seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

Overall, the assessment is deemed unreliable due to its internal inconsistencies, methodological shortcomings, and lack of adequate evidence. These failures hinder a thorough evaluation of impacts and support the conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline represents a vibrant cultural landscape where environment, language, tradition, and community intertwine. However, the assessment of cultural heritage and community identity is fundamentally inadequate, treating heritage merely as isolated and static assets. This approach neglects the ongoing social, cultural, and spiritual roles that these elements play within the community.

A significant shortcoming is the treatment of culturally important sites, specifically the cemeteries at Dalmore, Bragar, and Barvas. These sites are active burial grounds and places of spiritual practice, yet they are mischaracterised as static features in the assessment. This oversight fails to acknowledge their continued use and meaning, and disregards how development impacts their settings, leading to an incomplete evaluation of cultural effects.

Furthermore, the assessment overlooks intangible cultural heritage, including the Gaelic language, traditions, and the enduring relationship between the community and its coastal environment. These elements are vital to the area's identity but have not been considered, resulting in a significant omission that impairs understanding of the development's cultural impact.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking

population embodies a unique cultural identity akin to that of an Indigenous People. Yet, there has been no process of Free, Prior and Informed Consent, which diminishes the legitimacy of the assessment. This lack of meaningful engagement does not align with recognised principles for participation in decisions affecting cultural and environmental interests.

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

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

In summary, the failure to adequately assess living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been thoroughly examined, leaving the application insufficient for a proper evaluation of the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The failure to publish the full Social Impact Assessment represents a significant evidential gap that undermines the entire evaluation process for this development. While the developer engaged local residents through focus groups, the lack of transparency concerning the findings prevents both the public and the competent authority from fully understanding the social risks identified in the developer's own research. Existing summaries indicate that residents are already feeling measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement with the community and should not be dismissed as speculative; however, without access to the complete assessment, the findings cannot be properly scrutinised, limiting their significance in the decision-making process.

Furthermore, there is a perception among residents that the proposal poses a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite this critical insight, these impacts have not been adequately integrated into the main application or given the necessary consideration. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development, preventing a comprehensive understanding of its implications.

This lack of transparency also compromises the Environmental Impact Assessment process. An accurate assessment of social, economic, and health impacts is crucial for

developments of this scale, especially when community character and functioning may be affected. Without the complete dataset, the application fails to provide a thorough evidential basis for evaluating the balance between benefits and harm. From a policy standpoint, the application does not demonstrate compliance with the National Planning Framework 4 regarding health and wellbeing. Development should support positive health outcomes and avoid harm; however, the available evidence suggests existing adverse effects that have not been fully disclosed. Consequently, compliance with this policy cannot be established in the absence of the full assessment.

The procedural implications of this situation are serious. The competent authority cannot conduct a robust socio-economic and health evaluation without access to the complete Social Impact Assessment, representing a material omission within the application. This failure to meet the evidential requirements of the Environmental Impact Assessment regime is concerning. Ultimately, the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing adverse impacts, renders the evaluation incomplete and unreliable, hindering lawful determination and highlighting that the application is not backed by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts related to the proposed development is severely lacking and does not sufficiently acknowledge the extent of change or the sensitivity of the environment involved. The West Lewis coastline is characterised by its expansive Atlantic horizon, its undeveloped nature, and a profound sense of remoteness. The addition of large-scale turbines near the shoreline would create a consistent and overwhelming industrial presence, fundamentally altering this character and resulting in a permanent transformation of the landscape that cannot be reversed.

Moreover, the application fails to accurately depict the magnitude of the visual change. The size and proximity of the turbines would dominate the views from residential areas, historic sites, and popular coastal locations, leading to a direct impact on visual amenity and diminishing the defining qualities of naturalness and remoteness. This level of impact and its significance in such a sensitive landscape has not been properly conveyed in the assessment.

Concerns also arise regarding the selection and representation of visual viewpoints within the methodology. There is evidence to suggest that these viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly concerning significant cultural heritage sites and valuable landscapes. This raises the possibility that the visual impact has been underestimated, thus compromising the assessment's reliability.

Another critical shortcoming is the failure to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape that is visually and spatially linked to the Atlantic horizon. Instead of recognising their interdependence, the assessment treats these sites as isolated entities, leading to an

incomplete understanding of the impacts on their setting 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 signifies not only a visual impact but also a broader cultural and spatial harm that the application has not adequately considered.

From a policy standpoint, the proposal contradicts National Planning Framework 4 regarding the protection of natural areas and historical assets. The level of change proposed is incompatible with the mandate to maintain landscape character, visual amenity, and the setting of culturally important sites. The lack of a comprehensive worst-case assessment further diminishes any assertion of policy compliance.

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

Overall, the assessment inadequately represents the scale of the impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These deficiencies hinder a reliable evaluation and support the conclusion that the proposal is not compatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal presents a significant concern due to the incomplete assessment of construction and pollution risks, lacking the necessary detail to properly evaluate potential environmental effects. This development requires substantial seabed preparation and installation works in a high-energy Atlantic environment, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that are intended to be formulated post-consent, thereby obstructing any meaningful evaluation of their adequacy or effectiveness.

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

There is also a notable uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. In the absence of robust modelling and clearly defined management strategies, it remains impossible to ascertain the extent, duration, or ecological implications of these impacts. This uncertainty extends to the potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment.

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

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

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

FISHERIES AND MARINE LIFE

The proposal fails to provide a thorough evaluation of the ecological and socio-economic impacts on fisheries and marine life, despite the waters off the West Lewis coast hosting both a vibrant marine ecosystem and a significant fishing industry. The application does not convincingly demonstrate how these critical uses and habitats will be preserved without substantial disruption.

A major concern is the assumption that fishing activity can be relocated without consequences. There is no evidence presented that alternative fishing grounds are available, accessible, or suitable to accommodate increased pressure. This lack of information is critical, as such displacement poses a risk of overfishing in other areas and could have broader economic ramifications for the local fishing fleet. Without a solid, evidence-based assessment, understanding the implications for fisheries and local livelihoods becomes impossible.

The application also introduces considerable risks to marine species due to the anticipated underwater noise from construction activities. The use of high-energy hammer piling over an extended timeframe is expected to cause disturbances that reach large distances, thereby impacting species like dolphins. Concerns arise from the predicted disturbance to a significant portion of the local bottlenose dolphin population, yet the application diminishes the importance of these effects and does so without adequate supporting evidence.

There exists a notable contradiction within the application, where the need for licenses

to permit harm to European Protected Species is recognised while simultaneously describing the impacts as negligible. This inconsistency undermines the credibility of the assessment and raises significant concerns regarding adherence to the Habitats Regulations, especially when harm is anticipated at a level that necessitates legal authorisation.

Furthermore, the assessment neglects to address cumulative impacts resulting from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. A comprehensive evaluation of these collective effects is essential, as it directly influences our ability to gauge the overall impact on marine ecosystems and socio-economic conditions.

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

In conclusion, the deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions within the application collectively render the assessment incomplete and unreliable. These shortcomings hinder a proper evaluation of the effects on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is incomplete and does not fully consider the impacts of what is a single integrated project. The offshore turbines are linked to the onshore works, yet they are evaluated separately. This fragmented approach obscures the full scale of environmental and socio-economic effects.

Onshore elements involve cabling across protected moorland, the construction of a substation near Stornoway, and access infrastructure through sensitive landscapes. Excavation in areas of deep peat, particularly within Barvas Moor, is a significant concern as it is a carbon store and ecologically sensitive habitat. The application lacks a comprehensive assessment of these impacts, hindering the understanding of the project's overall environmental footprint.

By excluding or deferring the assessment of onshore impacts, the application fails to allow for a proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all project components are considered together. However, the separation of onshore and offshore elements means the combined impacts on peatlands, habitats, and communities remain unclear.

Additionally, there are significant risks to sensitive habitats, such as machair systems and peatland environments that are protected by policy. The application does not show that impacts on these habitats have been fully assessed or that appropriate avoidance measures have been taken. This indicates a gap in evidence regarding biodiversity

protection.

Concerns also arise about carbon balance. Disturbing peatland releases stored carbon and could create a carbon debt, contradicting renewable energy development objectives. The application does not sufficiently address this issue or show that the overall carbon balance is beneficial.

Furthermore, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application fails to provide evidence that the necessary consents or processes have been initiated, which raises questions about deliverability and lawful implementation.

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

In summary, the separation of project components, the lack of comprehensive assessment, and insufficient evidence on environmental and land use impacts make this part of the application incomplete and unreliable, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment lacks any consideration of dark skies and nocturnal wildlife, which is a significant oversight. The West Lewis coastline is notable for its exceptionally dark skies, which are essential to the area's environmental quality, cultural identity, and tourism potential. The proposed development would install permanent red aviation lighting that would create an intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

There has been no evaluation of how this lighting will impact visual amenity, landscape character, or the experiences of residents and visitors. Given the significance of dark skies to the local identity and to the developing sector of astro-tourism, this omission is particularly concerning. The lack of consideration for these factors highlights a clear gap in the overall assessment of landscape and environmental impacts.

Furthermore, the proposal does not address the effects of artificial lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly susceptible to artificial lighting, which can cause disorientation and increase the risk of collision. The absence of a lighting impact assessment or a phototaxis study means that the potential effects of aviation lighting on these species, and the associated mortality risk, have not been evaluated.

Compounding this issue, the ornithological assessment relies solely on daytime survey data, failing to account for nocturnal activity and related risks. Kittiwakes, which may forage or migrate during the night, are also at risk of disorientation from artificial lighting, yet this has not been assessed. The lack of site-specific night-time data results

in a critical deficiency in understanding the ecological impacts of the proposal.

Without an evaluation of nocturnal impacts, it becomes 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 has not been met, invoking the precautionary principle and preventing a lawful determination of the application.

From a policy standpoint, this omission contradicts the aims of National Planning Framework 4 concerning the safeguarding of natural places and environmental quality. It also detracts from the overall assessment of landscape and seascape impacts, as the character of night-time environments is a vital aspect of the ecosystem.

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

TOURISM

The application under consideration presents a significant deficiency in its assessment of tourism impacts, neglecting to evaluate both the economic and social ramifications for a vital sector of the Isle of Lewis economy. The economy of the island is heavily reliant on its wild coastline, near-pristine landscapes, dark skies, and overall sense of remoteness. While it is noted that 86% of visitors are attracted by the scenery, the application fails to provide any quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, their behaviour, or the overall economic contribution of tourism.

Tourism on the Isle of Lewis has experienced noteworthy growth, rising from £65 million in 2017 to over £81.5 million and supporting more than 1,000 jobs, accounting for up to 16% of the island's economy. However, there is no modelling of how the industrialisation of the seascape and the resulting decline in environmental quality would affect Tourism Gross Value Added or broader economic resilience. Without such an analysis, it remains unclear whether the proposed development would bring about a net economic benefit or harm an already established and expanding sector.

Another critical aspect overlooked in the assessment is the importance of environmental quality in sustaining tourism, particularly how unspoiled landscapes and dark skies enhance visitor experiences and cater to emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment only exacerbates this issue, resulting in a substantial gap in understanding the potential effects on a recognised and thriving part of the local economy.

In an island community characterised by limited economic diversification, the failure to evaluate the impacts on tourism has broader implications, affecting employment, local businesses, and overall community sustainability. Additionally, the absence of a

compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been properly addressed, contrary to the requirements set out in the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly concerning economic impact and the obligation to illustrate a net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector and does not furnish adequate evidence for the competent authority to assess the economic implications of the proposal.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development as defined by statutory duties and national policy. It echoes the issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This new application is positioned under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it still falls short.

A significant concern is the absence of a comprehensive and reliable evidential basis for the application’s determination. Critical gaps exist in baseline data, and the continued reference to an undefined design envelope raises questions. Mitigation measures mentioned are not specified, and important impact pathways, such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism, have been overlooked. Consequently, the Environmental Impact Assessment remains incomplete, hindering an understanding of potential significant effects and residual impacts.

The procedural shortcomings are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018. Furthermore, the non-disclosure of the complete Social Impact Assessment is a material omission that inhibits the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These failures collectively render the application unsuitable for determination.

Additionally, the proposal contradicts the National Planning Framework 4 by failing to demonstrate adequate protection of biodiversity, natural landscapes, and cultural heritage. It does not provide evidence that health and wellbeing impacts are acceptable, nor does it demonstrate a net economic benefit due to the lack of tourism impact modelling. Moreover, the cumulative effects of both offshore and onshore components have not been thoroughly assessed, obscuring their implications for

peatlands, carbon balance, habitats, and crofting land.

Uncertainties regarding environmental risks remain significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The evidential threshold required to demonstrate the absence of adverse effects beyond reasonable scientific doubt has not been fulfilled, invoking the precautionary principle and obstructing a lawful determination that impacts are acceptable.

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

In summary, the application is procedurally and substantively unfit for determination. The scale of information deficiencies, alongside policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. Therefore, the competent authority should refuse consent based on these grounds or employ the relevant regulatory measures to demand the submission of the necessary information.

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

Additional Comments

I would like to build a house on my family Croft in Bragar. A big part of my family's income is from a rental property with a sea view in the garage in baragr. With the turbines I don't want to live there and will have to leave the island. My family's income will significantly reduce
They are horrific for the environment and people lie about it because they are money makers.
The island will see no financial benefits from this either

You are lying to us all just leave out island alone

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: 52ADC80F

Member of the public 1388

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

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies that compromise its reliability and comprehensiveness regarding the environmental effects of the proposal. A major concern is the use of a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations. This flexibility introduces substantial uncertainty and hinders the ability to consistently apply a worst-case scenario, which detracts from the integrity of the assessment. Consequently, the impacts detailed may not accurately reflect those of the development that will ultimately be constructed, thereby limiting both public and competent authority understanding of the true extent of environmental effects.

The proposal relies extensively on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent on the premise that environmental harm will be mitigated in the future prevents any meaningful evaluation of these measures' effectiveness or an assessment of residual impacts. This approach of deferring crucial information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which necessitates that significant effects and mitigation strategies are clearly outlined before determination.

Additionally, the report reveals significant evidential gaps, including inadequate baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. Such deficiencies lead to uncertainty about the magnitude and significance of the impacts, especially where conclusions suggest negligible or non-significant effects, yet lack robust supporting data. The insufficiency of information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainties that cannot align with statutory requirements.

Due to these factors, the application does not satisfy the evidential threshold mandated by the Habitats Regulations, which necessitates 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 fails to adhere to the National Planning Framework 4, including biodiversity protection and environmental integrity requirements, as it does not demonstrate that impacts have been thoroughly assessed or that suitable safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives within the application is fundamentally inadequate and fails to satisfy the statutory requirements of the Environmental Impact Assessment

regime. Instead of offering a structured and reasoned comparison of realistic alternatives based on their environmental impacts, the application merely recounts the project's evolution. This narrative fails to establish that less harmful options have been thoroughly identified, assessed, and selected over more damaging ones.

There is a distinct lack of transparent or evidence-based comparisons of alternative offshore locations, development scales, or design configurations. Notably, the application does not illustrate that the developer has genuinely considered the possibility of siting turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be diminished. Given the sensitivity of the West Lewis coastline, and the crucial role of proximity to shore in assessing impact, the failure to conduct such analysis precludes any conclusion that the proposed siting is the least damaging option.

These deficiencies also extend to the assessment of cable routing and landfall, where evidence is insufficient to demonstrate that alternative routes have been adequately explored to avoid or minimise impacts on sensitive receptors. This includes areas of cultural and spiritual significance, such as Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis suggest that there has been no application of mitigation by design, resulting in an over-reliance on post-design mitigation measures.

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

From a policy standpoint, this deficiency weakens 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 constitutes a significant omission that contributes to the overall conclusion that the application has not been adequately assessed and cannot underpin a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed development has significant shortcomings in its assessment of marine ecology and protected species, which ultimately undermines understanding of the ecological receptors within the West Lewis coastal environment. This region is known for its sensitive and biologically active marine system; however, the baseline data provided is incomplete, and the methodologies used do not adequately capture the presence, behaviour, and habitat use of species. Consequently, the assessment lacks a reliable evidential basis for evaluating potential impacts.

A major gap exists in the analysis concerning otters, a European Protected Species. The application neglects to properly acknowledge and assess their active utilisation of coastal areas for foraging and movement. This oversight means that the evaluation of potential effects from construction disturbance, noise, and increased activity is insufficient, which calls into question the conclusions drawn regarding the absence of significant effects on this species.

Further concerns arise regarding the assessment of basking sharks, as the reliance on aerial surveys introduces considerable detection bias, particularly in challenging Atlantic conditions. This method is likely to underestimate their presence, especially when compared with established land-based observations that indicate frequent utilisation of these waters. The failure to adequately incorporate or consider such data results in an incomplete baseline and diminishes the credibility of the conclusions offered.

These methodological flaws mean that any conclusions regarding negligible or non-significant effects are based more on assumptions than on solid evidence. The lack of adequate baseline data also hampers the meaningful assessment of cumulative and indirect impacts, including those related to seasonal variations and broader ecosystem interactions. This generates uncertainty about the actual level of risk posed to marine species and habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents a fundamentally flawed ornithological assessment, marked by significant gaps in evidence and internal inconsistencies that compromise its conclusions. The site is situated within crucial foraging areas and migratory pathways along the west coast of the Isle of Lewis, which is home to internationally important seabird populations that are already experiencing decline. However, the application fails to demonstrate, to the requisite evidential standard, that these species will not be adversely affected.

A critical contradiction arises in the assessment, as the developer asserts there are no significant adverse effects while simultaneously putting forward a Habitats Regulations

derogation case, which is only necessary when significant harm is anticipated. This inconsistency casts doubt on the assessment's reliability and suggests that the conclusions drawn are unsupported by the evidence presented. The assessment does not adequately substantiate that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is insufficiently considered, and reliance on modelling approaches injects uncertainty, especially for species facing severe decline, such as Kittiwakes and Fulmars. The methodologies employed are prone to underestimating mortality, particularly given that baseline data may be incomplete and behavioural responses inadequately understood.

The positioning of turbines within a recognised migratory corridor creates an additional and significant risk, effectively serving as a barrier along a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term consequences of sustained mortality within this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application fails to satisfy the evidential threshold required to ascertain no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data gaps and modelling deficiencies, indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle, precluding a lawful conclusion in favour of consent.

Furthermore, the identified deficiencies constitute non-compliance with the National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The failure to demonstrate that internationally important seabird populations will not be adversely affected positions the proposal in direct opposition to national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is a vital cultural landscape where the environment, language, tradition, and community are deeply intertwined. However, the assessment of cultural heritage and community identity in the current application is fundamentally inadequate. It treats heritage merely as a collection of isolated, static assets, overlooking 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 they are categorised as static features in the assessment.

This approach neglects their continued use and meaning, failing to consider how development could affect their setting and, ultimately, their role in community life.

Moreover, the assessment lacks consideration of intangible cultural heritage, which includes the Gaelic language, traditions, and the enduring connection between the community and the coastal environment. These elements are essential to the area's identity, yet they are entirely omitted from the evaluation, creating a significant gap in understanding the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population holds a distinct cultural identity, recognised as Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the assessment's legitimacy and fails to align with established principles of participation in decisions that affect cultural and environmental interests.

Additionally, there is a critical procedural failure due to the absence of a compliant Island Communities Impact Assessment, which is a legal requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot fulfil its legal duty to evaluate the social, cultural, and economic impacts on the island community, making the determination of the proposal unlawful.

From a policy perspective, these deficiencies directly conflict with National Planning Framework 4, particularly regarding the protection of historic assets and places. The failure to adequately consider both tangible and intangible heritage, as well as to recognise living cultural practices, marks a clear deviation from policy requirements.

In summary, the combined failure to assess living heritage, intangible cultural value, community rights, and statutory obligations leads to a substantial evidential gap. The cultural impacts of the development have not been appropriately evaluated, and the application does not provide a robust basis for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

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

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

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and strong sense of remoteness. The introduction of large-scale turbines near the shoreline would result in a continuous and dominant industrial presence, fundamentally changing this unique character and leading to a permanent and irreversible transformation of the landscape.

The assessment accompanying the application inadequately captures the extent of visual change anticipated. Given the scale and proximity of the turbines, they are expected to overshadow views from residential areas, historic sites, and popular coastal locations. Such an impact would erode the essential qualities of naturalness and remoteness, yet the assessment fails to convey this level of impact or its significance within the context of such a sensitive landscape.

Concerns also arise regarding the methodology employed in selecting and presenting visual viewpoints. Evidence indicates that these viewpoints may not accurately reflect

the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the magnitude of visual impact has been understated, thus compromising the reliability of the assessment.

Another significant shortcoming is the lack of consideration for the interconnected relationship between landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a wider landscape setting that is visually and spatially linked to the Atlantic horizon. The assessment treats these heritage assets as isolated, neglecting their interdependence and resulting in an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these connections, altering how heritage assets are experienced and severing their relationship with the natural horizon. This goes beyond visual impact and encompasses a broader cultural and spatial harm that has not been adequately evaluated in the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4 concerning the protection of natural places and historic assets. The magnitude of change is inconsistent with the requirement to protect landscape character, visual amenity, and the setting of culturally significant sites. Moreover, the absence of a thorough worst-case assessment further undermines any assertion of policy compliance.

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal fails to provide a comprehensive assessment of construction and pollution risks, making it impossible to evaluate the likely environmental effects accurately. It involves significant seabed preparation and installation works in a high-energy Atlantic environment, yet lacks fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on undefined mitigation and contingency measures that would be prepared after consent, which undermines any meaningful assessment of their adequacy or effectiveness.

This lack of clarity is particularly alarming given the sensitive nature of the receiving

environment along the West Lewis coastline, which is home to clean coastal waters and vital habitats susceptible to sediment disturbance and contamination. While the application acknowledges potential risks such as sediment mobilisation and the possibility of chemical or oil spills, it does not adequately detail how these incidents will be prevented, controlled, or monitored.

Moreover, there is uncertainty surrounding the scale and behaviour of sediment plumes resulting from the seabed disturbance and cable installation. Without robust modelling and clearly articulated management strategies, it is impossible to ascertain the extent, duration, or ecological ramifications of these impacts. This uncertainty also affects the potential consequences for marine species and habitats already recognised as sensitive in the broader assessment.

The absence of detailed emergency response procedures only exacerbates these issues. By delaying contingency planning until after consent, the application obstructs a proper evaluation of whether suitable safeguards are in place to address pollution events. This introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures before making a decision.

From a regulatory standpoint, the postponement of crucial environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be evaluated prior to consent, and without such information, a lawful determination is unattainable. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the combination of undefined mitigation measures, inadequate management plans, and uncertainty about potential impacts makes the assessment materially deficient. These deficiencies preclude a thorough evaluation of construction and pollution risks and further emphasise that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents a range of significant deficiencies in its assessment of marine life and fisheries. There is an inadequate evaluation of the ecological and socio-economic effects related to the waters off the West Lewis coast, which are home to a diverse marine ecosystem and a thriving fishing industry. This assessment does not adequately address whether these habitats and activities can be safeguarded from disruption.

A major concern lies in the assumption that displacing fishing activity will not have adverse effects. The application fails to provide evidence that alternative fishing grounds are available and can handle the increased pressure. This lack of information is crucial, as the potential for overfishing in other areas could threaten the local fishing fleet's economic viability. Without a thorough and evidence-based evaluation, the impacts on fisheries and local livelihoods remain unclear.

Additionally, the proposal poses significant risks to marine species, particularly due to the underwater noise generated by construction activities. The anticipated use of high-energy hammer piling over a prolonged period is likely to disturb marine life across extensive areas, which includes species such as dolphins. The potential disturbance to a large portion of the local bottlenose dolphin population raises serious concerns, yet the application minimizes these impacts without adequate justification.

There is a notable inconsistency within the application, acknowledging the need for licences to permit harm to European Protected Species while simultaneously declaring the impacts as negligible. This contradiction calls into question the reliability of the assessment and raises issues regarding compliance with the Habitats Regulations, especially where anticipated harm requires legal approval.

Moreover, the assessment overlooks the cumulative impacts that arise from multiple factors, including habitat disturbance, noise, and the displacement of fishing activities. A comprehensive analysis of these combined effects is necessary to determine the overall impact on marine ecosystems and socio-economic conditions.

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

Overall, the absence of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the inconsistencies within the application result in an incomplete and unreliable assessment. These shortcomings hinder a proper evaluation of the implications for marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed development involves onshore infrastructure that is fundamentally linked to offshore turbines; however, the assessment of these elements is materially incomplete. This separation results in a fragmented analysis that fails to capture the full extent of environmental and socio-economic impacts, obscuring the project's overall footprint. The onshore components comprise cabling across protected moorland, the construction of a substation near Stornoway, and the establishment of access infrastructure through sensitive landscapes, specifically involving excavation in areas of deep peat, notably within Barvas Moor, which is both a significant carbon store and an ecologically sensitive habitat.

The application neglects to provide a thorough assessment of these impacts, thereby hindering a comprehensive understanding of the project's environmental consequences. By deferring or excluding evaluations of onshore impacts, the assessment limits the analysis of cumulative effects, which is a requisite of the Environmental Impact Assessment process. The separate evaluations of offshore and onshore components fail to fully comprehend the combined effects on peatlands,

habitats, and local communities.

Moreover, there are notable risks to sensitive habitats, such as machair systems and peatland environments, which are protected under policy. The application does not satisfactorily demonstrate that impacts on these habitats have been thoroughly evaluated or that sufficient avoidance measures have been implemented, resulting in a significant evidential gap concerning biodiversity protection.

The proposal further raises issues pertaining to carbon balance, as the disturbance of peatland may release stored carbon and create a carbon debt, which contradicts the objectives associated with renewable energy initiatives. The application does not sufficiently address this concern nor does it show that the overall carbon balance is maintained in a beneficial manner.

Furthermore, routing infrastructure through active croft land presents potential conflicts with existing land uses and legal rights. The application lacks evidence that necessary consents or processes have been initiated, leading to uncertainties regarding both deliverability and lawful implementation.

From a policy standpoint, the failure to assess the project comprehensively and 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 adverse impacts can be avoided or mitigated further undermines the application.

Overall, the disconnection between project components, the lack of a comprehensive assessment, and the insufficient evidence regarding environmental and land use impacts render this segment of the application incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment is deficient as it lacks consideration of dark skies and nocturnal wildlife, which are crucial elements of the West Lewis coastline's environmental quality and cultural identity. The area's exceptionally dark skies contribute significantly to its tourism value, yet the proposal introduces permanent red aviation lighting that creates an intrusive "wall of light" across the western horizon, fundamentally changing the night-time environment.

Additionally, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of residents and visitors. This oversight is particularly concerning given the rising significance of dark skies in promoting emerging tourism sectors like astro-tourism. The lack of a comprehensive assessment regarding these aspects represents a significant gap in the landscape and environmental evaluation.

Moreover, there is an absence of analysis regarding the effects of artificial lighting 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 responses, which can result in disorientation and increased risks of collision. The proposal does not encompass any impact assessment related to lighting or phototaxis studies, leaving an unaddressed question regarding how such aviation lighting may endanger these species or contribute to their mortality.

The reliance on daytime survey data in the ornithological assessment further exacerbates the issue, as it overlooks nocturnal activities and associated risks. For instance, Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation caused by artificial lighting, but this risk has not been evaluated. The lack of site-specific night-time data creates a critical shortfall in comprehending the ecological impacts involved.

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

From a policy standpoint, these omissions are in conflict with National Planning Framework 4 regarding the protection of natural places and environmental quality. Furthermore, they undermine the overall assessment of landscape and seascape impacts, given that night-time character is an integral aspect of the environment.

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

TOURISM

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

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

economic benefit or detract from a well-established and expanding sector.

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

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

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

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

SUMMARY

The 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 core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Despite being presented under an ostensibly stronger policy framework, which emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application still falls short.

There are significant gaps in the evidential basis for the application, including incomplete baseline data and reliance on an undefined design envelope. Furthermore, the proposed mitigation measures lack specification, and crucial impact pathways—including those affecting nocturnal wildlife, full onshore infrastructure, and tourism—have been omitted. As a result, the Environmental Impact Assessment is incomplete, hindering a thorough understanding of likely significant effects and residual impacts.

The procedural aspects of the application also exhibit clear deficiencies. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations

under the Islands (Scotland) Act 2018. Additionally, the failure to disclose the complete Social Impact Assessment represents a material omission, preventing the competent authority from adequately assessing impacts on community wellbeing, cultural identity, and economic resilience. These issues collectively render the application unsuitable for determination.

Moreover, the proposal directly conflicts with National Planning Framework 4, as it does not sufficiently protect biodiversity, natural places, and cultural heritage. It fails to demonstrate that health and wellbeing impacts are acceptable, nor can it substantiate a net economic benefit due to the absence of tourism impact modelling. A proper assessment of the cumulative impact of both offshore and onshore elements is lacking, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties and potentially significant environmental risks remain. Assessments of marine ecology, seabirds, protected species, and marine mammals are incomplete and, in certain instances, inconsistent. The evidential threshold required to confidently exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful conclusion regarding acceptable impacts.

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

In conclusion, the application is procedurally and substantively unfit for determination. The scale of information deficiencies, coupled with policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. Therefore, the competent authority must either refuse consent on these grounds or invoke the relevant regulatory provisions to necessitate the submission of the missing information. A formal request is made for the outright refusal of the application for the Spiorad na Mara Offshore Wind Farm.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: C001F5C7

Member of the public 1389

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

Dear Sir/Madam

This letter represents a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under 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 strong cultural identity. Concerns arise regarding the scale, proximity, and design of the proposal, as these factors call into question its compatibility with statutory requirements, national policy, and the principles of sustainable development.

A thorough review of the Environmental Impact Assessment Report and its supporting documentation reveals that the application does not provide an adequate evidential basis for lawful determination. Key environmental data is absent, baseline information appears limited and inconsistent, and several critical aspects of the proposal are not clearly defined. The use of a flexible design framework hampers understanding of likely significant effects, and reliance on unspecified mitigation measures raises concerns about their potential effectiveness. Consequently, the documentation fails to facilitate a complete or informed assessment of the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by robust evidence.

Furthermore, there are distinct and substantive conflicts with policy. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These inconsistencies directly challenge the statutory tests required for consent and weaken the competent authority's ability to ascertain the development's acceptability in policy terms.

The unprecedented scale of the proposal, involving large turbines situated in close proximity to the shoreline, raises significant concerns regarding landscape capacity, visual dominance, and environmental impact. Together, the lack of sufficient information, reliance on undefined mitigation strategies, evidential deficiencies, and clear policy non-compliance illustrate that the application is incomplete and unable to support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is substantially inadequate. This area is characterised as a biologically active marine system, yet the baseline data provided is incomplete. The methodologies employed do not effectively capture the presence, behaviour, and habitat use of relevant species. Consequently, the assessment lacks a reliable evidential basis necessary for evaluating potential impacts.

A significant gap exists concerning otters, a species protected under European law, where their active utilisation of coastal areas for foraging and movement has not been adequately acknowledged or assessed. The failure to consider their core foraging range and behavioural patterns leads to an insufficient evaluation of the potential impacts stemming from construction activities, noise, and increased human activity. Such omissions compromise the conclusions regarding the absence of significant effects on the otter population.

Further issues emerge in the evaluation of basking sharks, as the reliance on aerial surveys introduces a considerable detection bias, particularly given the conditions prevalent in the Atlantic. This methodology is likely to result in an underestimation of their presence, especially in light of established land-based observations that indicate frequent use of these waters. Neglecting to incorporate or adequately consider this data contributes to an incomplete baseline and diminishes the credibility of the assessment's conclusions.

These methodological deficiencies mean that the conclusions asserting negligible or non-significant effects are founded on assumptions rather than solid evidence. Additionally, the lack of comprehensive baseline data inhibits a meaningful assessment of cumulative and indirect impacts, including variations across seasons and broader ecosystem interactions. This creates uncertainty regarding the actual risks posed to marine species and their habitats.

From a regulatory standpoint, the application does not satisfy the stipulations of the Environmental Impact Assessment framework and the National Planning Framework 4, as it fails to properly identify or assess the protected species involved. The uncertainty generated by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it is not lawful to grant consent.

In conclusion, the assessment's reliability is fundamentally undermined by incomplete baseline data, flawed methodologies, and unsupported conclusions. These issues hinder a thorough evaluation of impacts on marine ecology and protected species, collectively suggesting that the application lacks a robust evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The concerns surrounding the ornithological assessment are significant, revealing major flaws that challenge its conclusions. The development’s location on the west coast of the Isle of Lewis, which is home to internationally important seabird

populations that are already in decline, necessitates a higher evidential standard to ensure that these species will not face adverse effects. However, the application fails to adequately assess the implications of displacement, collision risk, or habitat loss, particularly within key foraging areas and migratory pathways.

A notable inconsistency arises in the application, where the developer asserts that there are no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is typically invoked only when significant harm is anticipated. This contradiction raises doubts about the assessment's credibility and indicates a lack of support for the conclusions drawn from the available evidence. Furthermore, the assessment does not sufficiently demonstrate that seabirds linked to protected sites such as the Lewis Peatlands and St Kilda will remain unaffected. The crucial feeding grounds are not thoroughly considered, and the reliance on modelling approaches adds uncertainty, especially for declining species like Kittiwakes and Fulmars. The methodologies employed appear to underestimate mortality rates, compounded by incomplete baseline data and an inadequate understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor presents another serious risk, as it creates a barrier along a primary flight path that species use when travelling between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor are not adequately evaluated, nor are the potential effects on species with smaller global populations considered. From a regulatory standpoint, the application does not fulfil the evidential requirements necessary to ascertain that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with gaps in data and limitations in modelling, means that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, thereby undermining the validity of any conclusions drawn in favour of consent.

Additionally, the deficiencies noted reflect non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to prove that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy. Collectively, these issues reveal an assessment that is unreliable, marred by internal inconsistencies, methodological shortcomings, and a lack of sufficient evidence. These inadequacies hinder a thorough evaluation of impacts and culminate in the overall conclusion that the application does not satisfy the statutory requirements necessary for determination.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of landscape, seascape, and visual impacts associated with the proposal is fundamentally flawed and inadequately accounts for the scale of change and the sensitivity of the environment. The open Atlantic horizon along the West Lewis coastline is characterised by its undeveloped nature and a strong sense of remoteness. The introduction of large-scale turbines near the shoreline would establish a

continuous and dominant industrial presence, thereby fundamentally altering this character and leading to a permanent and irreversible transformation of the landscape.

Furthermore, the assessment inadequately reflects the extent of the visual change that would result from this development. Due to their scale and proximity, the turbines would significantly dominate views from nearby residential areas, historic sites, and popular coastal locations. Such dominance would adversely affect visual amenity and undermine the key qualities of naturalness and remoteness that define this area. The assessment fails to communicate the significance of these impacts within the context of such a sensitive landscape.

Methodological issues arise concerning the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not fully encompass the most sensitive receptors or the worst-case scenarios, particularly regarding critical cultural heritage sites and valued landscapes. This raises the possibility that the magnitude of visual impact has been underestimated, thus questioning the reliability of the assessment.

Additionally, there is a notable deficiency in addressing the interconnected nature of 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 leads to an incomplete evaluation of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal is at odds with National Planning Framework 4, particularly concerning the safeguarding of natural places and historic assets. The magnitude of change proposed is incompatible with the obligation to protect landscape character, visual amenity, and the context of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertion of compliance with policy requirements.

It is 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. The resulting transformation is therefore substantial and permanent, unable to be reduced to an acceptable level through any mitigation efforts.

In summary, the assessment fails to accurately convey the extent of the impacts, 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 protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal involves significant seabed preparation and installation works within a high-energy Atlantic environment. However, the assessment of construction and pollution risks is incomplete, lacking the necessary detail to adequately evaluate the likely environmental effects. Notably, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included in the application. Instead, it depends on mitigation and contingency measures that are to be prepared post-consent. This approach prevents any meaningful assessment of their adequacy or effectiveness, raising substantial concerns regarding the sensitivity of the receiving environment.

The West Lewis coastline is home to clean coastal waters and important habitats that are particularly vulnerable to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it fails to provide adequate information on how these risks will be prevented, controlled, or monitored. Additionally, there is considerable 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, including potential consequences for sensitive marine species and habitats identified within the broader assessment.

Furthermore, the absence of detailed emergency response procedures exacerbates these issues. By deferring contingency planning to a stage following consent, the application hinders the ability to evaluate whether appropriate safeguards are in place for responding to pollution events. This introduces procedural risk and undermines the competent authority's ability to assess environmental protection measures during the determination process. From a regulatory standpoint, the deferral of essential environmental safeguards contravenes the requirements of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation measures must be assessed prior to consent. The absence of such critical information renders a lawful determination impossible. The application also fails to demonstrate compliance with relevant policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The proposed development has not sufficiently assessed the implications for fisheries and marine life, leading to a lack of a thorough evaluation of ecological and socio-economic impacts. The coastal waters off West Lewis are home to a rich marine

ecosystem and an active fishing industry. However, the application does not adequately demonstrate that these vital uses and habitats will be safeguarded against significant disruption.

One major concern is the presumption that fishing activities can be shifted without repercussions. The application lacks evidence regarding the availability and accessibility of alternative fishing grounds that could handle additional pressure. This critical omission raises significant concerns, as displacing fishing activities may lead to overfishing in other areas, which could adversely affect the local fishing fleet's economic viability. The absence of a clear, evidence-based assessment means that the effects on fisheries and local livelihoods are not fully comprehended.

Furthermore, the proposal presents considerable risks to marine species, particularly through the underwater noise generated during construction. The anticipated use of high-energy hammer piling over an extended timeframe is likely to disrupt marine life over considerable distances, notably affecting species such as dolphins. The expected disturbance to a significant portion of the local bottlenose dolphin population is alarming; however, the application tends to minimise the seriousness of these impacts without providing adequate evidence to support such conclusions.

There is also a troubling inconsistency in the application where it acknowledges the need for licences to permit harm to European Protected Species while simultaneously describing these impacts as negligible. This contradiction diminishes the reliability of the assessment and raises questions about adherence to the Habitats Regulations, particularly when anticipated harm may require legal authorisation.

Additionally, the assessment does not adequately address the cumulative effects stemming from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined impacts, it is impossible to determine the overall consequences for marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to comply with the National Planning Framework 4 and the National Marine Plan. It does not demonstrate that the development can coexist with current marine users or avoid unacceptable consequences for marine biodiversity, which hampers any assertion that the proposal embodies sustainable development.

In summary, the deficiencies in evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal inconsistencies within the assessment result in an incomplete and unreliable evaluation. These flaws obstruct a proper understanding of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment concerning the onshore infrastructure is significantly incomplete and neglects to consider the full range of impacts stemming from what constitutes a single

integrated project. The offshore turbines are closely interconnected with the onshore works, yet they are assessed in isolation, leading to a disjointed approach that conceals the true extent of environmental and socio-economic repercussions.

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

Excluding or postponing the assessment of onshore impacts restricts a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components are considered collectively; however, the differentiation between offshore and onshore elements leads to a lack of clarity regarding the combined impacts on peatlands, habitats, and local communities.

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

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of any assessment regarding nocturnal wildlife and dark skies represents a significant gap in the Environmental Impact Assessment. The proposal threatens the West Lewis coastline, known for its remarkably dark skies, which are essential to the region's environmental quality, cultural identity, and potential for tourism, particularly in areas such as astro-tourism. The introduction of permanent red aviation lighting will create a persistent and intrusive “wall of light” effect across the western horizon, fundamentally altering the night-time environment.

There is no evaluation of how this lighting will impact visual amenity, landscape character, or the experiences of both residents and visitors. Such an oversight is particularly concerning given the critical role that dark skies play in the area's identity and in the burgeoning tourism sector. The lack of consideration for these impacts results in a significant shortfall in the overall landscape and environmental assessment.

Moreover, there is a notable absence of any evaluation of the effects on nocturnal wildlife, particularly species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel, which are highly sensitive to artificial lighting. This sensitivity can lead to disorientation and an increased risk of collisions. The application fails to include any lighting impact assessment or a phototaxis study, which are essential to understanding how aviation lighting may adversely affect these species or contribute to increased mortality rates.

The ornithological assessment's reliance on daytime survey data further exacerbates this issue, as it does not adequately capture nocturnal activity or the associated risks. Even species like Kittiwakes, which may forage or migrate at night, are at risk of disorientation from artificial lighting, yet this has not been assessed. The lack of site-specific night-time data creates a critical gap in understanding the ecological impacts of the proposal.

Without proper assessment of these nocturnal impacts, it remains impossible to ascertain whether protected species or designated sites would face adverse effects. The evidential standard required to rule out any adverse effects beyond reasonable scientific doubt is not met, which invokes the precautionary principle and hinders a lawful determination.

From a policy standpoint, this omission contradicts the National Planning Framework 4's emphasis on protecting natural places and environmental quality. Additionally, it undermines the wider assessment of landscape and seascape impacts, as the character of the night-time environment is an integral component of the overall setting.

In summary, the failure to address dark skies and nocturnal wildlife in the assessment constitutes a substantial evidential gap. The absence of baseline data, impact modelling, and species-specific analysis leaves 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 proposal for the Spiorad na Mara Offshore Wind Farm signifies a profound inadequacy in meeting the standards of sustainable development, as established by statutory duties and national policy. It echoes the core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of

industrialisation was highlighted. However, this application is now under a more rigorous policy framework, which places greater emphasis on biodiversity, peatland preservation, landscape integrity, and the well-being of communities.

A complete and trustworthy evidential foundation for determining this application is lacking. There are significant gaps in the baseline data, the use of an undefined design envelope, and a reliance on unspecified mitigation measures. Moreover, crucial impact pathways, including those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism, have been omitted. Consequently, the Environmental Impact Assessment is incomplete, which hampers a thorough understanding of potential significant effects or residual impacts.

There are evident procedural shortcomings as well. The absence of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018, while the failure to disclose the full Social Impact Assessment is a notable omission. These shortcomings inhibit the competent authority from properly evaluating impacts on community well-being, cultural identity, and economic resilience, rendering the application unsuitable for determination.

This proposal is in direct opposition to the National Planning Framework 4. It fails to illustrate the protection of biodiversity, natural landscapes, and cultural heritage, does not demonstrate that health and well-being impacts are acceptable, and cannot provide evidence of a net economic benefit due to the lack of tourism impact modelling. The cumulative effects of offshore and onshore components have not been adequately assessed, obscuring the implications for peatlands, carbon balance, habitats, and crofting land.

Uncertainties and potentially significant environmental risks remain. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are either incomplete or internally inconsistent. 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 that the impacts are acceptable.

Additionally, the proposal would lead to substantial and irreversible alterations to a particularly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual relationships, and impacts on tourism are all permanent consequences that cannot be mitigated to an acceptable degree.

In summary, the application is procedurally and substantively unfit for determination. The extensive information deficiencies, coupled with policy conflicts and unresolved environmental risks, hinder a lawful and evidence-based decision. The competent authority is urged to refuse consent on these grounds or to utilise the appropriate regulatory provisions to request 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: 5E65E577

Member of the public 1390

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 is submitted under marine licensing and Environmental Impact Assessment rules. The proposal is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise from the scale, proximity, and design of the project, particularly regarding its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a solid evidential basis for a lawful decision. There is a notable absence of critical environmental data, while baseline information is limited and inconsistent. Many key aspects of the proposal remain undefined, and the use of a flexible design framework obscures an understanding of potential significant effects. Furthermore, relying on unspecified mitigation measures prevents any assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, with claims of negligible effects lacking robust support.

There are significant conflicts with policy. The proposal seems to contradict the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate that the national requirements to safeguard biodiversity and environmental integrity will be fulfilled. These discrepancies directly relate to the statutory requirements for consent and impair the competent authority's ability to determine the project's acceptability in policy terms.

The unprecedented scale of the proposal raises significant concerns regarding landscape capacity, visual dominance, and environmental impact due to the large turbines being situated close to the shoreline. Overall, the lack of sufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a complete, transparent, or reliable overview of the anticipated environmental effects of the proposal. The adoption of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates

considerable uncertainty. This uncertainty hampers the consistent application of a worst-case scenario, compromising the integrity of the assessment. As a result, the presented impacts may not accurately reflect the actual development, hindering both public understanding and the competent authority's ability to grasp the true extent of environmental effects.

The application places heavy reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. As such, consent is sought based on the premise that environmental harm will be managed later. This approach undermines any meaningful evaluation of effectiveness or assessment of residual impacts. Deferring critical information to post-consent stages is procedurally unacceptable and contradicts the aims of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly established before determination.

There are also notable evidential deficiencies, which include gaps in baseline data, limitations in methodology, and the use of assumptions rather than site-specific evidence. These issues lead to uncertainty about the scale and significance of impacts, especially where findings of negligible or non-significant effects are presented without robust supporting data. Insufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that is incompatible with statutory requirements.

Consequently, the application does not satisfy the evidential threshold needed under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This triggers the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal fails to show compliance with National Planning Framework 4, which includes stipulations on biodiversity protection and environmental integrity, as it cannot demonstrate that impacts have been fully assessed or that appropriate safeguards are in place.

Overall, 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 robust assessment of environmental effects, leaving the competent authority unable to make an informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The proposed development raises significant concerns due to the inadequacy of the assessment of alternatives, which fails to comply with the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives based on their environmental effects, the application presents a narrative of project development that does not adequately demonstrate that less harmful options have been properly identified and evaluated in favour of more damaging solutions.

There is a glaring lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not convincingly show that the developer has genuinely considered positioning the turbines further offshore, where the potential for reducing visual, ecological, and coastal impacts would likely increase. Considering the sensitivity of the West Lewis coastline, along with the crucial role that proximity to shore plays in determining impact, the failure to conduct such an analysis means that it cannot be concluded that the proposed siting is the least damaging alternative.

The shortcomings are further evident in the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly explored to mitigate impacts on sensitive receptors, including culturally and spiritually significant sites such as Barvas Cemetery. The absence of a clear strategy for avoidance and the lack of comparative analysis highlight that mitigation by design has not been implemented. Instead, the application relies heavily on post-design mitigation measures.

Consequently, the application does not sufficiently 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. Without a robust assessment of alternatives, it cannot be claimed that the proposal is sustainable or compliant with policy.

From a policy standpoint, this significant deficiency undermines adherence to the National Planning Framework 4, especially concerning the protection of natural environments, cultural heritage, and community wellbeing. The absence of a systematic and comparative assessment represents a critical omission that leads to the overall conclusion that the application has not been properly evaluated and cannot support a lawful determination.

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.

ORNITHOLOGY AND SEABIRD IMPACTS

The application is fundamentally flawed, particularly in its ornithological assessment, which contains significant gaps and internal inconsistencies that undermine its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application does not sufficiently demonstrate that these species will not be adversely affected. The proposed development is situated within key foraging areas and migratory pathways, yet the assessment fails to adequately evaluate the implications of displacement, collision risk, or habitat loss.

There is a notable contradiction within the application itself, as the developer concludes that there will be no significant adverse effects while simultaneously presenting a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions are not backed by the available evidence. The assessment lacks adequate evidence to ensure that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not fully considered, and the reliance on modelling introduces uncertainty, particularly for declining species like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, especially given that baseline data is incomplete and behavioural responses are not fully

understood.

Placing turbines within a recognised migratory corridor poses an additional and substantial risk, effectively acting as a barrier in a key flight path for species travelling between the United Kingdom and Iceland. The application does not provide a thorough assessment of the long-term consequences of sustained mortality in this corridor, nor does it evaluate the potential effects on species with small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to confirm no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and prevents a lawful conclusion in support of consent. Furthermore, the identified deficiencies represent a failure to adhere to National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected puts the proposal in direct conflict with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is fundamentally flawed, failing to recognise the West Lewis coastline as a living cultural landscape where the environment, language, tradition, and community are interconnected. The application takes a reductive approach by treating heritage merely as a collection of isolated, static assets, disregarding their ongoing social, cultural, and spiritual significance within the community.

A critical shortcoming is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are active burial and spiritual sites; however, they are mischaracterised as static features. This oversight neglects their continued use and meaning, as well as the potential impact of development on their surroundings. The result is an incomplete evaluation of cultural effects, overlooking their vital role in community life.

Additionally, the assessment fails to consider intangible cultural heritage elements, including the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These aspects are crucial to the area's identity, yet they are entirely omitted from the assessment, representing a significant gap. Without addressing these factors, it is impossible to fully understand the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population possesses a unique cultural identity with characteristics recognised in Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the legitimacy of the assessment and fails to align with established principles of participation in matters affecting cultural and environmental interests.

Another procedural failure is the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The competent authority is unable to fulfil its legal obligation to assess the social, cultural, and economic impacts on the island community without this assessment, preventing a lawful determination.

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

Overall, the failure to adequately assess living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been thoroughly evaluated, and the application does not provide a sufficient foundation for understanding the true cultural costs of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The community's wellbeing is at stake due to the significant deficiencies in the assessment of social impacts, health, and wellbeing associated with this proposal. Despite the developer commissioning a Social Impact Assessment that included focus groups with local residents, the full report has not been made available. This lack of transparency creates a substantial evidential gap, hindering both public understanding and the competent authority's ability to assess the social risks identified through the developer’s research.

Residents are already facing measurable stress, anxiety, and concern directly linked to the scale and proximity of the proposed development. These impacts have been confirmed through direct engagement and are not merely speculative. However, without access to the complete assessment, the ability to scrutinise these findings is severely limited, ultimately affecting their significance in the decision-making process.

Moreover, the proposal has been perceived as a threat to community identity and cohesion, with “cultural loss” noted in the developer's findings. Despite this recognition, such impacts have not been adequately incorporated into the main application nor given the attention they deserve. By withholding the full Social Impact Assessment, the true social and human costs of the development remain obscured.

This lack of transparency further undermines the Environmental Impact Assessment process. Understanding the comprehensive social, economic, and health impacts is crucial for developments of this magnitude, especially when they threaten community character and functioning. The omission of the full dataset renders the application insufficient for assessing the balance between benefits and potential harm.

From a policy standpoint, the application fails to show compliance with National Planning Framework 4 concerning health and wellbeing. Developments should promote positive health outcomes and avoid harm, yet the evidence currently suggests existing adverse effects that have not been fully disclosed. Consequently, without the complete assessment, compliance with relevant policy cannot be verified.

The procedural implications of this situation are significant. The competent authority is unable to perform a thorough socio-economic and health evaluation without the complete Social Impact Assessment, representing a critical omission in the application and a failure to meet the evidential standards required by the Environmental Impact Assessment regime.

In summary, the failure to disclose the full Social Impact Assessment, paired with the evidence of existing adverse impacts, results in an incomplete and unreliable assessment. This inadequacy prevents a lawful determination and underscores the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

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

Additionally, there is a failure to evaluate the interconnectedness of landscape, seascape, and cultural heritage. Significant sites like the Calanais Standing Stones and

other Scheduled Monuments are part of a broader landscape that is visually and spatially linked to the Atlantic horizon. Instead of acknowledging their interdependence, the assessment treats these as separate entities, leading to an incomplete analysis of impacts on their setting and cultural significance.

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal involves significant seabed preparation and installation works in a high-energy Atlantic environment. However, the assessment of construction and pollution risks is lacking in detail necessary for evaluating potential environmental effects. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included in the application. Instead, it relies on mitigation and contingency measures that will be prepared after consent, which does not allow for a meaningful evaluation of their adequacy or effectiveness.

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

Furthermore, there is uncertainty about the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to determine the extent, duration, or ecological effects of these impacts. This uncertainty also relates to the

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

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

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

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

FISHERIES AND MARINE LIFE

The assessment of fisheries and marine life associated with the application lacks sufficient depth, failing to provide a robust evaluation of both ecological and socio-economic impacts. The area off the West Lewis coast is home to a diverse marine ecosystem and supports an active fishing industry. However, the proposal does not adequately demonstrate the protection and maintenance of these vital uses and habitats without significant disruption.

A critical concern is the assumption made within the application regarding the displacement of fishing activity, which is presented as a feasible option without acknowledging potential consequences. There is no evidence provided to support the availability, accessibility, or capacity of alternative fishing grounds to accommodate any increased pressure. This significant omission raises concerns about overfishing in other areas and may have broader economic repercussions for the local fishing fleet. Consequently, without a clear and evidence-based assessment, the impacts on fisheries and the livelihoods they support remain poorly understood.

Furthermore, the proposal introduces considerable risks to marine species, especially from the underwater noise generated during construction activities. The anticipated high-energy hammer piling over an extended period is likely to cause disturbances over large distances, potentially affecting species such as dolphins. The forecasted disturbance to a substantial portion of the local bottlenose dolphin population is particularly alarming; yet, the application minimises the significance of these effects without adequate supporting evidence.

There is an evident inconsistency in the application, wherein the requirement for licences to permit harm to European Protected Species is acknowledged while simultaneously describing the impacts as negligible. This contradiction raises concerns about the credibility of the assessment and compliance with the Habitats Regulations, especially when harm is anticipated to an extent that requires legal authorisation.

Additionally, the assessment neglects to consider the cumulative impacts resulting from various pressures, 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 fails to demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not illustrate that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thus preventing any conclusion that the proposal represents sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application for the proposed project is fundamentally flawed due to its incomplete assessment of onshore infrastructure, which fails to recognise the interconnectedness of the offshore turbines and onshore works. This fragmented evaluation obscures the true magnitude of environmental and socio-economic impacts. Key onshore components include the installation of cabling across protected moorland, the construction of a substation near Stornoway, and related access infrastructure, all of which traverse sensitive landscapes. The planned excavation, particularly in areas of deep peat within Barvas Moor, threatens a significant carbon store and ecologically sensitive habitat. However, the current application does not provide a thorough assessment of these critical impacts, limiting understanding of the overall environmental footprint of the project.

The application’s deferral or exclusion of onshore impacts obstructs proper evaluation of cumulative effects, which is essential for an accurate Environmental Impact Assessment. This process mandates that all elements of a project are considered collectively. The failure to integrate the offshore and onshore assessments means that the combined impacts on peatlands, habitats, and local communities remain largely uncharted.

Furthermore, the proposal poses serious risks to delicate habitats such as machair systems and peatland environments that are already protected under policy. There is

insufficient demonstration within the application that the impacts on these vital habitats have been thoroughly evaluated or that effective avoidance measures have been employed. This creates a significant evidential gap regarding biodiversity protection.

Additionally, the disturbance of peatland raises concerns about carbon balance, as it releases stored carbon, potentially incurring a carbon debt that contradicts the aims of renewable energy initiatives. The application does not sufficiently tackle this issue nor does it prove that the carbon balance remains favourable.

The routing of the project infrastructure through active croft land also raises potential conflicts with established land use and legal rights. The lack of evidence that the required consents or processes have been initiated calls into question the project's viability and lawful execution.

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

In summary, the disconnection of project components, the absence of comprehensive assessments, and the lack of substantiated evidence on environmental and land use impacts collectively render this aspect of the application inadequate and unreliable, thereby obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The application is fundamentally flawed due to the absence of assessments regarding dark skies and nocturnal wildlife, which represents a substantial omission in the Environmental Impact Assessment. The coastline of West Lewis is known for its remarkably dark skies, an essential aspect of the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting, which would be visible over extensive distances, threatens to create a continuous and intrusive “wall of light” effect across the western horizon, fundamentally altering the night-time environment.

Moreover, there has been no consideration of how this lighting would affect visual amenity, landscape character, or the experiences of both residents and visitors. This lack of assessment is particularly concerning given the significance of dark skies to the region's identity and the growth of emerging tourism sectors like astro-tourism. The failure to evaluate these impacts results in a glaring gap in the overall landscape and environmental assessment.

Additionally, there is a complete lack of evaluation regarding the impacts of artificial lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly sensitive to such lighting, which can lead to disorientation and an increased risk of collision. The application does not

contain any lighting impact assessment or phototaxis study, meaning it fails to consider how aviation lighting may influence these species or potentially raise mortality rates.

Compounding this issue is the reliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activity and the associated risks. For example, Kittiwakes, which may forage or migrate at night, are also at risk of disorientation due to artificial lighting, yet this has not been evaluated. The absence of site-specific night-time data creates a crucial gap in understanding the ecological impacts of the proposal.

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

From a policy standpoint, these omissions contradict National Planning Framework 4 regarding the safeguarding of natural places and environmental quality. This oversight also diminishes the overall assessment of landscape and seascape impacts, as the night-time character is an integral element of the environment.

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

TOURISM

The assessment of tourism impacts lacks material depth and does not adequately evaluate the economic and social ramifications for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the region's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness. Although the application notes that 86% of visitors are attracted by the scenery, it fails to provide a quantified evaluation of how large-scale offshore infrastructure would influence visitor numbers, behaviours, or the overall economic contribution.

Tourism has seen considerable growth, rising from £65 million in 2017 to more than £81.5 million, supporting over 1,000 jobs and representing up to 16% of the island's economy. Nevertheless, the application does not assess how the industrialisation of the seascape and the degradation of environmental quality would impact Tourism Gross Value Added or the broader economic resilience of the area. Without this analysis, it is impossible to determine whether the proposed development would offer a net economic benefit or detract from an established and burgeoning sector.

Furthermore, the assessment neglects to consider the significance of environmental quality in bolstering tourism, particularly the value of unspoiled landscapes and dark skies for visitor experiences, as well as for emerging markets such as nature-based

tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, resulting in a crucial gap in understanding the potential impacts on a recognised and growing segment of the local economy.

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

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

Overall, the inability to quantify tourism impacts, assess the environmental factors influencing visitor behaviours, and recognise the island's economic dependencies creates a significant evidential gap. This hinders a thorough evaluation of economic effects and leads to the conclusion that the application is insufficient.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the criteria for sustainable development as outlined in statutory duties, national policy, and evidential standards. This application reiterates the fundamental issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was a key concern. Despite the current proposal being presented within a strengthened policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, it remains deficient.

The application lacks a comprehensive and reliable evidential basis for its determination. There are significant gaps in baseline data, an undefined design envelope, unspecified mitigation measures, and a failure to address important impact pathways, including those affecting nocturnal wildlife, the full extent of onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is inadequate, inhibiting a thorough understanding of the likely significant effects and residual impacts.

Procedurally, there are notable failures as well. The absence of a compliant Island Communities Impact Assessment breaches the statutory requirements established under the Islands (Scotland) Act 2018, while the non-disclosure of the complete Social Impact Assessment constitutes a serious oversight. These shortcomings hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal is at odds with the National Planning Framework 4. It does not demonstrate the necessary protection for biodiversity, natural areas, and cultural heritage, 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. Moreover, the cumulative impact of both offshore and onshore components has not been adequately assessed, obscuring effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties persist regarding environmental risks, which could be significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also inconsistent in some instances. The evidential threshold needed 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 the impacts.

This proposal will lead to substantial and irreversible alterations to a 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 will create permanent changes that cannot be mitigated to an acceptable level.

In summary, the application is both procedurally and substantively unsuitable for determination. The scale of informational deficiencies, combined with conflicts with policy and unresolved environmental risks, obstructs a lawful, evidence-based decision. Therefore, the competent authority must either refuse consent based on these grounds or invoke the necessary regulatory provisions to obtain the missing information.

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

Additional Comments

I cannot find a single positive about the proposed develpment. I am yet to be shown anything positive about it.

The Hebrides have little to offer except for the unique wilderness and this is going to be stamped all over.

If the recompense was significant, prehaps it would be worth considering, but all I can see is destruction, to line the pockets of big business, in the guise of clean energy.

I am devastated for the island - its wildlife and its people.

Is nothing sacred?

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: DCE833A6

Member of the public 1391

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 presents significant deficiencies that undermine its reliability and transparency regarding the environmental impacts of the proposal. A notable issue is the reliance on a flexible Project Design Envelope, which lacks definitive turbine dimensions, layouts, or configurations. This absence creates uncertainty and hinders the effective application of worst-case scenario assessments. Consequently, the presented impacts may not accurately reflect the final construction, making it difficult for both the public and the competent authority to grasp the full extent of the potential environmental effects.

Additionally, the application is contingent upon mitigation measures, management plans, and monitoring strategies that are currently undefined. Seeking consent with the expectation that these environmental harms will be addressed at a later stage undermines the possibility of a meaningful evaluation of their effectiveness or the assessment of residual impacts. This postponement of critical information to post-consent phases is procedurally unacceptable and contradicts the Environmental Impact Assessment regime's purpose, which mandates that likely significant effects and mitigation measures be clearly established before determination.

There are also profound evidential shortcomings within the assessment, including gaps in baseline data and limitations in methodology, as well as a reliance on assumptions rather than concrete, site-specific evidence. This leads to uncertainty concerning the magnitude and significance of impacts, particularly where conclusions of negligible or non-significant effects lack robust supporting data. The inadequacy of information prevents a clear understanding of cumulative and worst-case impacts and introduces a degree of scientific uncertainty that does not align with statutory requirements.

Moreover, these factors mean the application does not satisfy the evidential threshold established under the Habitats Regulations, which demands the exclusion of adverse effects beyond reasonable scientific doubt. The precautionary principle is thus engaged, especially in relation to protected species and sensitive habitats. The proposal also fails to demonstrate adherence to National Planning Framework 4, including stipulations regarding biodiversity protection and environmental integrity, as it is impossible to verify that impacts have been comprehensively assessed or that suitable safeguards are in place.

In summary, the combination of an undefined design envelope, lack of specified mitigation strategies, and significant gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies obstruct a lawful and thorough evaluation of environmental effects, meaning the competent authority lacks sufficient information to make an informed determination regarding the application.

ASSESSMENT OF ALTERNATIVES

The proposed project lacks a sufficient assessment of alternatives and does not adhere to the statutory requirements outlined in the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of feasible alternatives based on their environmental effects, the application only provides a narrative account detailing the evolution of the project. This method does not adequately demonstrate that less harmful options have been identified, assessed, and selected over more damaging alternatives.

Furthermore, there is a lack of transparent, evidence-based comparisons of different offshore locations, development scales, and design configurations. The developer has not convincingly considered the possibility of placing turbines further offshore, where the potential visual, ecological, and coastal impacts could be lessened. Given the sensitivity of the West Lewis coastline and the critical role that proximity to the shore plays in impact assessments, the absence of such analysis undermines any assertion that the proposed siting is the least damaging option available.

The inadequacies also extend to the assessment of cable routing and landfall, where there is insufficient evidence that alternative routes have been adequately explored to minimise impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The lack of a clear strategy for avoidance and the absence of comparative analyses suggest that mitigation by design has not been adequately applied, instead relying heavily on post-design mitigation measures.

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species is significantly lacking, failing to offer a comprehensive or dependable understanding of ecological receptors within the West Lewis coastal environment. This region is noted for its sensitivity and biological activity, yet the baseline data remains inadequate, with the methodologies employed not effectively capturing species presence, behaviour, and habitat utilisation. Consequently, the assessment does not establish a solid evidential basis for evaluating potential impacts.

One notable gap is the treatment of otters, a species protected under European law. The application does not adequately recognise or assess their active use of coastal areas for foraging and movement. This oversight regarding their core foraging range and behavioural patterns means that the potential effects of construction-related disturbances, noise, and increased human activity have not been sufficiently evaluated. Such omissions undermine any claims made about the absence of significant effects on this species.

Additionally, the assessment of basking sharks presents further deficiencies. The reliance on aerial surveys introduces 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 usage of these waters. The failure to incorporate or appropriately consider this data leads to an incomplete baseline, further diminishing the credibility of the conclusions reached.

These methodological shortcomings result in conclusions regarding negligible or non-significant effects being based on assumptions rather than robust evidence. The lack of adequate baseline data also hinders meaningful assessments of cumulative and indirect impacts, which include seasonal variations and broader ecosystem interactions. As a result, there is substantial uncertainty regarding the true extent of 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, given that protected species have not been correctly identified or evaluated. The uncertainty introduced by these deficiencies precludes the exclusion of adverse effects beyond a reasonable scientific doubt, thereby invoking the precautionary principle. Under these conditions, granting consent would not be lawful.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, exhibiting significant gaps in evidence and internal inconsistencies that seriously undermine 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 sufficiently demonstrate that these species will not suffer adverse effects. The development site is situated within key foraging areas and migratory pathways, yet the implications of displacement, collision risk, and habitat loss are not adequately evaluated.

There exists a fundamental contradiction within the application, as the developer

concludes that there will be no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is typically only needed when significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the underlying evidence.

Moreover, the assessment lacks sufficient evidence to confirm that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these vital feeding grounds is not fully recognised, and the reliance on modelling approaches introduces uncertainty, particularly for species in steep decline like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, especially given incomplete baseline data and a lack of understanding of behavioural responses.

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

From a regulatory standpoint, the application does not satisfy the evidential threshold necessary to confirm no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data gaps and modelling limitations, means that the standard of beyond reasonable scientific doubt has not been met. This engages the precautionary principle, thereby precluding a lawful conclusion in favour of consent.

The identified deficiencies also reflect non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected directly conflicts with national policy.

Overall, the assessment is unreliable due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. These issues hinder a thorough evaluation of impacts and contribute to the conclusion that the application does not meet the statutory requirements necessary for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment related to community identity and cultural heritage is insufficient. It does not acknowledge the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply interconnected. Instead, the application treats heritage as a collection of separate, unchanging assets, neglecting their ongoing social, cultural, and spiritual significance within the community.

There are notable shortcomings in how culturally important sites, such as the

cemeteries at Dalmore, Bragar, and Barvas, are handled. These sites serve as active burial grounds and spaces for spiritual practices, yet they are classified as static features. This perspective overlooks their continued use and meaning, as well as the potential impacts of development on their surroundings. Such misrepresentation leads to a flawed evaluation of cultural effects and ignores their essential role in community life.

Moreover, the assessment does not address intangible cultural heritage, which includes the Gaelic language, traditions, and the enduring connection between the community and the coastal environment. These components are vital to the area's identity but are completely overlooked in the assessment, indicating a significant gap. Without considering these aspects, the cultural ramifications of the development remain unclear.

There are additional issues related to community rights and participation. The Gaelic-speaking population has a distinct cultural identity, with characteristics akin to those of an Indigenous People. However, the application has not undertaken a process of Free, Prior and Informed Consent. This lack of genuine engagement calls into question the legitimacy of the assessment and does not adhere to established principles for involving communities in decisions affecting their cultural and environmental interests.

A serious procedural error is the failure to provide a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. This absence hinders the competent authority's ability to meet its legal obligation to examine the social, cultural, and economic effects on the island community. The lack of this assessment alone renders a lawful decision impossible.

From a policy viewpoint, these shortcomings put the proposal at odds with National Planning Framework 4, particularly concerning the safeguarding of historic assets and locations. Ignoring both tangible and intangible heritage and failing to acknowledge living cultural practices clearly diverges from policy expectations.

In summary, the neglect of living heritage, intangible cultural values, community rights, and legal obligations creates a significant evidential void. The cultural impacts of the proposed development have not been adequately assessed, and the application falls short in providing a reliable basis for understanding the true cultural costs involved.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal under consideration is accompanied by a Social Impact Assessment commissioned by the developer, which included focus groups with local residents. However, the full report has not been published, resulting in a significant evidential gap. This lack of transparency precludes both public understanding and the competent authority's ability to fully assess the social risks highlighted by the developer’s own research.

Summaries available indicate that residents are currently experiencing measurable

stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts are based on direct engagement, not speculation. Nevertheless, the failure to disclose the complete assessment hampers the capacity for proper scrutiny and limits the determination of the significance of these findings in the decision-making process.

Evidence suggests that the proposal is perceived as a direct threat to community identity and cohesion, with “cultural loss” noted within the developer’s findings. Despite these concerns, such impacts have not been sufficiently integrated into the application or given appropriate consideration. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency further undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is critical for developments of this magnitude, especially when community character and functioning may be compromised. The absence of the complete dataset leads to a failure in presenting a comprehensive evidential basis for weighing the benefits against the potential harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and mitigate harm; however, existing evidence points to adverse effects that remain undisclosed. Without the full assessment, it cannot be shown that the proposal complies with this policy.

The procedural ramifications are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation due to the lack of access to the complete Social Impact Assessment. This omission is material within the application and reflects a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, alongside the evidence of existing adverse impacts, results in an incomplete and unreliable assessment. This undermines the lawful determination of the application and highlights that it lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of visual, seascape, and landscape impacts is significantly lacking and does not sufficiently address the degree of change or the sensitivity of the surrounding environment. The West Lewis coastline is characterised by its expansive Atlantic horizon, undeveloped nature, and a pronounced sense of remoteness. The proposed installation of large-scale turbines near the shore would create a continuous industrial presence that would fundamentally alter this character, leading to a permanent and irreversible transformation of the landscape.

Moreover, the application fails to adequately portray the extent of this visual change. The scale and proximity of the turbines are such that they would dominate views from residential areas, historic sites, and popular coastal locations. This would negatively affect visual amenity and diminish the qualities of naturalness and remoteness. The assessment does not effectively communicate the significance of this impact within the context of such a sensitive landscape.

Concerns also exist regarding the methodology used in selecting and presenting visual viewpoints. There is evidence to suggest that these viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly with respect to key cultural heritage sites and high-value landscapes. Consequently, there is a risk that the true extent of visual impact has been underestimated, which calls into question the credibility of the assessment.

Additionally, the assessment neglects to consider the interconnected relationship between the landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a larger landscape context that is visually and spatially linked to the Atlantic horizon. Rather than recognising these sites as interdependent, the assessment treats them as isolated entities, resulting in a partial evaluation of their setting and cultural importance.

The industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are perceived and severing their ties to the natural horizon. This alteration represents not merely a visual impact but a broader cultural and spatial detriment that has not been adequately evaluated within the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, particularly regarding the safeguarding of natural places and historic assets. The scale of change proposed is at odds with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. Furthermore, the lack of a comprehensive worst-case assessment further undermines claims of compliance with policy.

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

In summary, the assessment fails to accurately reflect the scale of impact, the sensitivity of the environment, and the interrelated nature of landscape and heritage. These shortcomings inhibit a trustworthy evaluation and reinforce the conclusion that the proposal is not compatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is insufficient and lacks the detail needed to evaluate environmental effects. The proposal includes significant seabed

preparation and installation works in a high-energy Atlantic environment, but there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures to be prepared after consent, which hinders any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures raises concerns given the sensitivity of the surrounding environment. The West Lewis coastline features clean coastal waters and important habitats that are at risk from sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it does not provide enough detail on how these risks will be prevented, controlled, or monitored.

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

The lack of detailed emergency response procedures further exacerbates these issues. By postponing contingency planning until after consent, the application fails to allow for an evaluation of whether appropriate safeguards are in place to address pollution incidents. This situation introduces procedural risk and weakens the ability of the competent authority to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the postponement of crucial environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be assessed before consent can be granted, and without such information, a lawful determination is not possible. Additionally, the application does not demonstrate compliance with policy requirements regarding environmental protection and water quality.

In summary, the lack of defined mitigation measures, absence of detailed management plans, and uncertainty about potential impacts make the assessment materially deficient. These issues prevent a thorough evaluation of construction and pollution risks and further indicate that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment concerning fisheries and marine life associated with this application presents notable deficiencies that fail to provide a comprehensive understanding of ecological and socio-economic impacts. The waters off the West Lewis coast are known to support a diverse marine ecosystem alongside a thriving fishing industry; however, the proposal lacks adequate evidence to demonstrate that these uses and habitats can be preserved or maintained without significant disruption.

A fundamental concern is the presumption that fishing activities can be displaced without adverse consequences. The application does not substantiate claims that alternative fishing grounds are readily available, accessible, or capable of accommodating additional fishing pressure. This critical gap in the assessment is particularly significant, as displacement could lead to overfishing in alternative areas, thereby imposing broader economic ramifications on the local fishing fleet. Consequently, without a clear, evidence-based analysis, the implications for fisheries and livelihoods remain inadequately understood.

Moreover, the proposal introduces considerable risks to marine species, predominantly due to underwater noise produced during construction activities. The anticipated high-energy hammer piling over a prolonged duration poses the risk of widespread disturbance, potentially impacting species such as dolphins. The projected disruption to a substantial segment of the local bottlenose dolphin population raises serious concerns, yet the application tends to downplay the gravity of these effects without sufficient corroborating evidence.

Furthermore, there exists a notable inconsistency within the application, wherein the necessity for licences to permit harm to European Protected Species is acknowledged. Simultaneously, the application characterises these impacts as negligible. This contradiction undermines the assessment's credibility and raises significant questions regarding compliance with the Habitats Regulations, particularly in cases where anticipated harm necessitates legal authorisation.

The assessment also neglects to account for cumulative impacts resulting from various pressures, such as habitat disruption, noise pollution, and the displacement of fishing activity. In the absence of a thorough evaluation of these combined effects, it remains impossible to determine the overall implications for marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not convincingly 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 avert unacceptable impacts on marine biodiversity, which hinders any conclusion regarding the proposal's alignment with sustainable development principles.

In summary, the deficiencies concerning evidence on fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies culminate in an assessment that is both incomplete and unreliable. These shortcomings obstruct a rigorous evaluation of impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment pertaining to the onshore infrastructure is fundamentally flawed and does not encompass the full range of impacts associated with what constitutes a singular integrated project. The relationship between the offshore turbines and the

onshore works is essential; however, the current assessment treats them in isolation, leading to a fragmented methodology that conceals the actual magnitude of environmental and socio-economic ramifications.

The onshore components consist of cabling across areas of protected moorland, the construction of a substation in proximity to Stornoway, and the necessary access infrastructure traversing sensitive landscapes. These activities involve excavation in regions of deep peat, notably within Barvas Moor, which serves as a critical carbon reservoir and is an ecologically delicate habitat. The application fails to provide a thorough evaluation of these impacts, thereby impeding a holistic understanding of the project's environmental footprint.

By omitting or postponing the assessment of onshore impacts, the application obstructs a proper appraisal of cumulative effects. According to the Environmental Impact Assessment requirements, all project components should be evaluated collectively. The division of offshore and onshore elements results in an incomplete understanding of the cumulative impacts on peatlands, habitats, and local communities.

Moreover, there are considerable risks posed to sensitive habitats, including machair systems and peatland ecosystems, which are afforded policy protection. The application does not adequately illustrate that impacts on these habitats have been thoroughly evaluated or that suitable avoidance measures have been employed, resulting in a significant evidential shortfall concerning biodiversity protection.

The proposal further raises issues concerning carbon balance. The disruption of peatland results in the release of stored carbon, potentially incurring 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.

Furthermore, the routing of the infrastructure through active croft land presents potential conflicts with existing land use and legal rights. The application lacks evidence indicating that the requisite consents or processes have been initiated, prompting doubts regarding its deliverability and compliance with legal standards.

From a policy standpoint, the failure to assess the project in its entirety and to demonstrate protection for peatlands, habitats, and land use interests is inconsistent 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's integrity.

Collectively, the disaggregation of project components, the absence of a comprehensive assessment, and the lack of evidence concerning environmental and land use impacts culminate in a submission that is incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment lacks any assessment of dark skies and nocturnal wildlife, which is a significant omission. The West Lewis coastline is known for its exceptionally dark skies, which contribute to the area's environmental quality, cultural identity, and tourism appeal. However, the proposal introduces permanent red aviation lighting that is visible over great distances. This lighting would create a continuous "wall of light" across the western horizon, fundamentally changing the night-time environment.

There is also no evaluation of how this lighting will impact visual amenity, landscape character, or the experiences of residents and visitors. This is particularly concerning given the importance of dark skies to the region's identity and to emerging sectors like astro-tourism. The failure to address these impacts creates a notable gap in the landscape and environmental assessment.

Moreover, the application does not assess the impacts on nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are sensitive to artificial lighting, which can disorient them and increase collision risks. Without a lighting impact assessment or a phototaxis study, there is no evaluation of how the proposed aviation lighting may affect these species or potentially increase mortality rates.

This omission is further exacerbated by the use of daytime survey data in the ornithological assessment, which does not adequately reflect nocturnal activity or the associated risks. Species like Kittiwakes, which forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this risk has not been examined. The lack of site-specific night-time data results in a crucial gap in understanding the ecological impacts.

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

From a policy standpoint, these omissions conflict with National Planning Framework 4 concerning the protection of natural places and environmental quality. Furthermore, this undermines the overall assessment of landscape and seascape impacts, as the character of the night-time environment is a vital component of the ecosystem.

In summary, the absence of any assessment of dark skies and nocturnal wildlife represents a significant evidential gap. The failure to provide baseline data, impact modelling, and species-specific analysis leaves the application incomplete and unable to support a lawful determination.

TOURISM

The economic impact assessment included in the application is significantly lacking, particularly regarding the consequences for tourism, a vital sector of the Isle of Lewis economy. Tourism relies heavily on the island's wild coastline, almost untouched landscape, dark skies, and its overall sense of remoteness. While the application notes that 86% of visitors are attracted by the scenery, it fails to provide any quantitative analysis of how the proposed large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contributions from tourism.

The growth of tourism has been notable, rising from £65 million in 2017 to over £81.5 million, with this sector supporting more than 1,000 jobs and constituting approximately 16% of the island's economy. Nevertheless, the application does not explore how the industrialisation of the seascape and potential decline in environmental quality could affect Tourism Gross Value Added or the overall economic resilience of the area. Without such an analysis, it is impossible to determine if the development would yield a net economic benefit or, conversely, threaten a well-established and expanding sector.

Moreover, the assessment neglects to consider the significance of environmental quality in the tourism sector, particularly how unspoiled landscapes and dark skies enhance the visitor experience and contribute to burgeoning markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, leading to a considerable gap in understanding the impacts on this growing facet of the local economy.

In an island community that has limited economic diversification, the failure to properly assess the effects on tourism carries broader implications for employment opportunities, local enterprises, and overall community sustainability. The absence of a thorough Island Communities Impact Assessment indicates that these economic vulnerabilities have not been adequately evaluated, which is a requirement under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not adequately demonstrate adherence to the National Planning Framework 4, particularly regarding economic impact and the essential requirement to show a net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector, failing to provide enough evidence for the competent authority to evaluate the economic ramifications of the proposal.

In summary, the lack of a thorough quantification of tourism impacts, the insufficient assessment of the environmental factors driving visitor behaviour, and the oversight of the island's economic dependency culminate in a significant evidential gap. This gap undermines a comprehensive evaluation of the economic effects and supports the conclusion that the application is fundamentally incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the requirements of sustainable development as outlined by statutory

duties, national policy, and evidential standards. This application mirrors the key issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Presenting this under an enhanced policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing does not rectify the fundamental shortcomings.

There are notable deficiencies in the evidential basis required for determining the application. Critical gaps exist in baseline data, and there remains an undefined design envelope alongside unspecified reliance on mitigation measures. Furthermore, key impact pathways, such as those affecting nocturnal wildlife, the complete onshore infrastructure, and tourism impacts, have been overlooked. Consequently, the Environmental Impact Assessment is insufficient, impeding a comprehensive understanding of likely significant effects or residual impacts.

Additionally, procedural failures are evident. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, and the incomplete disclosure of the Social Impact Assessment represents a serious omission. Such deficiencies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal is in direct contradiction with National Planning Framework 4. It fails to adequately protect biodiversity, natural environments, and cultural heritage, does not demonstrate acceptable health and wellbeing impacts, and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. Moreover, the cumulative effects of both offshore and onshore components have not been thoroughly assessed, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and may be significant. Incomplete assessments of marine ecology, seabirds, protected species, and marine mammals are internally inconsistent and do not satisfy the evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt. This engages the precautionary principle, precluding a 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, loss of dark skies, and disruption of cultural and visual relationships will have permanent effects on tourism that cannot be sufficiently mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The vast array of information gaps, coupled with conflicts with policy and unresolved environmental risks, obstructs the ability to make a lawful, evidence-based decision. Therefore, it is imperative that the competent authority either refuses consent on these grounds or employs the relevant regulatory provisions to obtain the

necessary missing information.

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

Additional Comments

I am deeply concerned that the invaluable natural environment and ecology will be hugely damaged by this development. There is no need for this industrialisation of our natural world. There is enough energy being created in Scotland already and there is no need for this. Tourists travel to the Isle of Lewis for its outstanding beauty and this will directly negatively impact our tourist industry.

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: A3253547

Member of the public 1392

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. A thorough review of the Environmental Impact Assessment Report and the accompanying documentation reveals significant deficiencies in planning, environmental, cultural, and procedural aspects. The development is situated off the west coast of the Isle of Lewis, an area notable for its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. The design, scale, and proximity of the proposed wind farm raise urgent concerns about its compliance with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential foundation necessary for a lawful determination. There are critical gaps in environmental data, and the baseline information provided is both limited and inconsistent. Many key elements of the proposal remain undefined. The employment of a flexible design framework obscures a clear comprehension of potential significant effects, and the reliance on unspecified mitigation measures renders their effectiveness impossible to evaluate. Consequently, the documentation fails to facilitate a comprehensive or informed understanding of the impacts on the environment, cultural heritage, or local communities. Assertions of negligible or non-significant effects are not underpinned by robust evidence.

Moreover, there are evident and serious conflicts with policy. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. These policy conflicts are pivotal, undermining the capacity of the competent authority to determine that the development meets acceptable policy standards.

The unprecedented scale of the proposal poses significant challenges for this location, as it includes large turbines placed in close proximity to the shoreline. This raises major concerns about landscape capacity, visual impact, and overall environmental consequences. The combination of insufficient information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a thorough and transparent account of the potential environmental consequences associated with the proposal. The incorporation of a flexible Project Design Envelope, which lacks commitment to defined turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This ambiguity hinders a consistent worst-case scenario analysis, thereby compromising the integrity of the assessment. As a result, the reported impacts may not accurately reflect the final development, leaving both the public and the competent authority uninformed about the true environmental implications.

The application places significant reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. By seeking consent on the premise that environmental harm will be managed in the future, the opportunity for a meaningful evaluation of effectiveness or assessment of residual impacts is severely limited. Deferring crucial information to post-consent stages is not procedurally acceptable and contradicts the purpose of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation must be clearly established before any determination can be made.

Furthermore, there are critical evidential shortcomings, including gaps in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. This leads to uncertainty about the magnitude and significance of impacts, especially where claims of negligible or non-significant effects are made without robust supporting data. The lack of adequate information obstructs a clear comprehension of cumulative and worst-case impacts, fostering scientific uncertainty that fails to align with statutory obligations.

Consequently, the application does not meet the evidential criteria stipulated under the Habitats Regulations, which requires 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 alignment with National Planning Framework 4, including stipulations related to biodiversity preservation and environmental integrity, as it has not been shown that impacts have been comprehensively assessed or that proper safeguards are in place.

When considered collectively, the reliance on an ambiguous design envelope, the absence of specified mitigation strategies, and the gaps in baseline data render the Environmental Impact Assessment Report untrustworthy and incomplete. These flaws preclude a lawful and thorough assessment of environmental effects, meaning that the competent authority cannot justifiably determine the application based on the information currently provided.

ASSESSMENT OF ALTERNATIVES

The application fails to meet the statutory requirements of the Environmental Impact Assessment regime, particularly in its assessment of alternatives. Instead of a thorough

and reasoned comparison of realistic alternatives based on their environmental effects, it offers a narrative detailing the evolution of the project. This method does not convincingly demonstrate that less harmful options have been properly identified, assessed, and selected over more damaging solutions.

Moreover, there is a notable lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. The application notably does not show that the developer has adequately considered placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be mitigated. The sensitivity of the West Lewis coastline and the critical role of proximity to shore in determining impacts further highlight the absence of this analysis, which undermines any claims that the proposed siting is the least damaging option.

Additionally, the deficiencies extend to cable routing and landfall assessment, revealing insufficient evidence that alternative routes have been thoroughly explored to avoid or lessen impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis signifies that mitigation by design has not been effectively applied, leading to a reliance on post-design mitigation measures instead.

Ultimately, the application does not show that environmental harm has been minimised through the careful selection of site, layout, and routing of infrastructure. This reflects a failure to adhere to the established mitigation hierarchy and obstructs the competent authority's ability to ascertain the existence of less harmful and more suitable alternatives. Without a comprehensive assessment of alternatives, it cannot be affirmed that the proposal constitutes a sustainable or policy-compliant solution.

From a policy standpoint, this inadequacy compromises adherence to National Planning Framework 4, especially concerning the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment represents a material omission, reinforcing the conclusion that the application has not been properly assessed and is incapable of supporting a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The coastal environment of West Lewis is a highly sensitive and biologically active marine system. However, the assessment of marine ecology and protected species conducted in relation to this area is materially deficient, failing to provide a complete or reliable understanding of the ecological receptors involved. The baseline data is incomplete, and the methodologies employed do not adequately capture crucial information regarding species presence, behaviour, and habitat use. Consequently, the conclusions drawn do not rest on a sound evidential basis for evaluating potential impacts.

Particularly concerning is the omission of otters, which are a European Protected

Species. The application neglects to properly recognise and assess their active use of coastal areas for foraging and movement. This oversight in considering their core foraging range and behavioural patterns means that the potential effects of construction-related disturbance, noise, and increased activity have not been properly evaluated. As a result, the assessment's conclusions regarding the absence of significant effects on otters are undermined.

Further shortcomings arise in the evaluation of basking sharks. The reliance on aerial surveys introduces significant detection bias, especially in Atlantic conditions. This method is likely to underestimate the actual presence of these sharks, particularly when compared to established land-based observations that indicate their frequent use of these waters. The failure to incorporate or adequately consider such data leads to an incomplete baseline and undermines the reliability of the conclusions presented.

These methodological deficiencies mean that the claims of negligible or non-significant effects are based more on assumptions than on robust evidence. The lack of sufficient baseline data hinders the meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty regarding the true scale of risk posed to marine species and habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

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

There is a critical contradiction within the application itself. While the developer asserts that there will be no significant adverse effects, they simultaneously submit a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated.

This inconsistency raises doubts about the assessment's reliability and suggests that the conclusions drawn are not backed by the evidence provided.

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

Placing turbines within a recognised migratory corridor adds another layer of risk. This placement effectively creates a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of ongoing mortality in this corridor have not been sufficiently assessed, nor have the potential effects on species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, data gaps, and modelling flaws means that the required standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle and renders the conclusion in support of consent unlawful.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is a dynamic cultural landscape, where the intertwined elements of environment, language, tradition, and community play a vital role in shaping local identity. However, the assessment of cultural heritage and community identity is fundamentally inadequate, treating heritage as a collection of isolated, static assets without acknowledging their ongoing significance within the community.

There are particular concerns regarding culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas, which serve as active places of burial and spiritual practice. Unfortunately, the assessment fails to recognise their continued use and the implications of development on their surroundings, resulting in an incomplete evaluation of cultural effects and neglecting their importance in community life.

Moreover, the assessment overlooks intangible cultural heritage, including the Gaelic language and traditions that define the community's relationship with the coastal environment. These aspects are crucial to local identity yet are entirely omitted from the analysis, leaving a significant gap in understanding the cultural impact of the development.

The lack of engagement with the Gaelic-speaking population, who possess a distinct cultural identity akin to that of an Indigenous People, raises further issues. The absence of a process for Free, Prior and Informed Consent undermines the credibility of the assessment, failing to uphold the principles of participation in decisions that affect cultural and environmental interests.

Additionally, there is a critical procedural failure due to the lack of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. This omission prevents the competent authority from meeting its legal obligations to evaluate the social, cultural, and economic impacts on the island community, hindering lawful determination of the proposal.

From a policy standpoint, these shortcomings conflict with the National Planning Framework 4, especially concerning the protection of historic assets and places. The neglect to consider both tangible and intangible heritage, along with the disregard for living cultural practices, reflects a clear deviation from policy requirements.

In summary, the failure to adequately assess living heritage, intangible cultural value, community rights, and statutory obligations leads to a significant evidential gap. The cultural impacts of the proposed development have not been thoroughly evaluated, and the application lacks a sufficient basis for understanding its true cultural cost.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The failure to publish the full Social Impact Assessment presents a significant evidential gap, hindering both public understanding and the competent authority's ability to evaluate the social risks identified through the developer’s own research. This lack of transparency is particularly concerning given that the assessment was commissioned by the developer and included focus groups with local residents. Available summaries reveal that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts, derived from direct engagement, are substantive and should not be dismissed as speculative. The omission of the full assessment limits scrutiny of the findings and their significance in the decision-making process.

Moreover, there is substantial evidence indicating that the proposal threatens community identity and cohesion, with “cultural loss” noted in the developer’s findings. However, these crucial impacts have not been adequately integrated into the main application or given the necessary consideration. The withholding of the complete Social Impact Assessment obscures the true human and social costs associated with

the development.

The absence of transparency compromises the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health implications is vital for developments of this magnitude, especially when community character and functioning may be at stake. The failure to provide the complete dataset prevents the application from offering a comprehensive evidential basis to assess the balance between benefits and harm.

From a policy perspective, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. While development should foster positive health outcomes and mitigate harm, the existing evidence points to adverse effects that remain undisclosed. Thus, without the full assessment, compliance with the requisite policy cannot be established.

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

In conclusion, the combination of the non-disclosure of the full Social Impact Assessment and the evidence of existing adverse impacts renders the assessment incomplete and unreliable, preventing a lawful determination and affirming 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 in close proximity to the shoreline threatens to create a continuous industrial presence that would fundamentally change this character, resulting in a permanent and irreversible transformation of the landscape.

The application does not accurately represent the extent of visual change that would occur. The scale and proximity of the turbines are such that they would dominate views from residential areas, historic sites, and frequently visited coastal locations. This dominance would directly impact visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment fails to adequately communicate the significance of this impact within the context of such a sensitive environment.

Methodological issues are also evident in the selection and presentation of visual viewpoints. It appears that the viewpoints included may not comprehensively represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the concern that the magnitude of visual impact has been understated, thereby compromising the reliability of the assessment.

Moreover, there is a notable deficiency in addressing the interconnected relationship between landscape, seascape, and cultural heritage. Important sites, including the Calanais Standing Stones and other Scheduled Monuments, form part of a larger landscape setting that is visually and spatially linked to the Atlantic horizon. The assessment considers these assets in isolation, failing to acknowledge their interdependence, which results in an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are perceived and severing their relationship with the natural horizon. This represents not merely a visual impact but also a broader cultural and spatial harm that has not been properly assessed in the application.

From a policy standpoint, the proposal contravenes National Planning Framework 4 in terms of safeguarding natural places and historic assets. The magnitude of change proposed is incompatible with the need to protect landscape character, visual amenity, and the setting of culturally significant sites. The lack of a comprehensive worst-case assessment further undermines any assertion of policy compliance.

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

Collectively, these deficiencies in the assessment prevent an accurate representation of the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. This reinforces the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

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

While the application does acknowledge risks such as sediment mobilisation and accidental chemical or oil spills, it does not adequately detail the strategies for preventing, controlling, or monitoring these risks. Moreover, there exists uncertainty regarding the scale and behaviour of sediment plumes that may arise from seabed

disturbance and cable installation. The absence of robust modelling and clearly defined management strategies leaves unanswered questions about the extent, duration, and ecological impacts of these disturbances. This uncertainty also extends to potential effects on marine species and habitats, which have already been identified as sensitive within the broader assessment.

Furthermore, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application inhibits the assessment of whether suitable safeguards are established to address pollution events. This creates procedural risks and undermines the competent authority's ability to evaluate environmental protection measures at the time of determination.

From a regulatory standpoint, the postponement of critical environmental safeguards is in conflict with the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be assessed prior to granting consent, and the absence of this information prevents a lawful determination. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality. Collectively, these deficiencies obstruct a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is fundamentally incomplete.

FISHERIES AND MARINE LIFE

The proposal presents significant concerns regarding its assessment of fisheries and marine life, failing to provide a thorough evaluation 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, yet the application does not adequately demonstrate how these vital uses and habitats will be safeguarded from disruption.

A notable issue is the presumption that fishing activities can be relocated without adverse effects. The application lacks any evidence that alternative fishing grounds are available or can support the additional pressure caused by displacement. This significant gap raises the potential for overfishing in other areas, with possible wider economic repercussions for the local fishing fleet. Without a comprehensive and evidence-backed assessment, the implications for fisheries and local livelihoods remain unclear.

Moreover, the proposal poses considerable risks to marine species, especially due to the underwater noise generated during construction. The use of high-energy hammer piling over prolonged periods is expected to disturb a wide area, impacting species such as dolphins. The anticipated disturbance to a substantial portion of the local bottlenose dolphin population raises serious concerns, yet the application minimizes these effects without adequate supporting evidence.

The application also exhibits a contradictory stance regarding the need for licences for harm to European Protected Species, while simultaneously characterising the impacts as negligible. This inconsistency undermines the credibility of the assessment and

raises questions about adherence to the Habitats Regulations, particularly when harm is anticipated to a degree that necessitates legal authorisation.

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

From a policy standpoint, the application fails to demonstrate compliance with National Planning Framework 4 and the National Marine Plan. It does not illustrate that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thereby precluding 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 render the assessment inadequate and unreliable. These shortcomings hinder a proper evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure associated with the project is fundamentally flawed, failing to address the comprehensive impacts stemming from what constitutes a single integrated development. The offshore turbines and the onshore works are interconnected, yet they are evaluated in isolation, leading to a fragmented assessment that obscures the true magnitude of environmental and socio-economic consequences.

Key onshore components include the cabling that traverses protected moorland, the construction of a substation near Stornoway, and the necessary access infrastructure through ecologically sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, a significant carbon reservoir and ecologically sensitive habitat. The application does not present a thorough evaluation of these impacts, hindering a complete understanding of the project's overall environmental footprint.

The application also neglects to assess onshore impacts adequately, which prevents a proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates a holistic consideration of all project components; however, the disjointed treatment of offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities remain unclear.

Significant risks to sensitive habitats, such as machair systems and peatland environments that are subject to policy protection, are also present. The application fails to demonstrate that the effects on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, creating a notable

evidential gap regarding biodiversity protection.

Moreover, concerns arise regarding carbon balance due to the disturbance of peatland, which can release stored carbon and potentially create a carbon debt, undermining the objectives of renewable energy development. The application does not sufficiently address this issue or prove that the overall carbon balance is beneficial.

Additionally, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is insufficient evidence that the necessary consents or procedures have been initiated, leading to questions about the project's deliverability and lawful execution.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is notable for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism value. The proposed development introduces permanent red aviation lighting that will create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment. This lighting has not been assessed for its impact on visual amenity, landscape character, or the experiences of residents and visitors, despite the critical importance of dark skies for the region's identity and the growth of sectors like astro-tourism.

There is a particularly concerning absence of evaluation regarding the impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting, which can cause disorientation and increase collision risks. The application does not include a lighting impact assessment or a phototaxis study to understand how the proposed aviation lighting may affect these species and potentially increase mortality rates. Furthermore, the ornithological assessment relies solely on daytime survey data, neglecting nocturnal activity and the associated risks, leaving vulnerable species such as Kittiwakes, which may forage or migrate at night, unassessed for their risks from artificial lighting.

The lack of site-specific night-time data creates a critical gap in understanding the ecological impacts. Without this assessment, it is impossible to determine whether protected species or designated sites would be adversely affected. The evidential

standard required to exclude adverse effects beyond reasonable scientific doubt is not met, which invokes the precautionary principle and prevents a lawful determination of the application.

Moreover, from a policy standpoint, these omissions conflict with National Planning Framework 4 regarding the protection of natural places and environmental quality. This oversight also undermines the comprehensive assessment of landscape and seascape impacts, as the character of the night-time environment is an integral aspect of the ecosystem.

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

TOURISM

The application acknowledges that a substantial 86% of visitors are attracted to the Isle of Lewis due to its stunning scenery, yet it lacks a detailed assessment of how large-scale offshore infrastructure could influence visitor numbers and overall economic contributions. Tourism is intrinsically linked to the area's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness, which all play a critical role in the visitor experience. The absence of a thorough analysis raises serious concerns about the potential economic and social repercussions for this vital sector.

Tourism on the Isle of Lewis has experienced remarkable growth, rising from £65 million in 2017 to over £81.5 million, supporting over 1,000 jobs and representing up to 16% of the island's economy. However, the application fails to model the implications of the industrialisation of the seascape and the consequent loss of environmental quality on Tourism Gross Value Added and overall economic resilience. Without this crucial analysis, it remains unclear whether the proposed development would result in a net economic benefit or jeopardise an already thriving sector.

Moreover, the importance of environmental quality in sustaining tourism has been overlooked. The significance of unspoiled landscapes and dark skies cannot be underestimated, particularly regarding emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this deficiency, creating a substantial gap in understanding the impacts on this growing facet of the local economy.

Given the limited economic diversification of this island community, neglecting 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 properly evaluated, as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not adequately demonstrate adherence

to the National Planning Framework 4, especially regarding economic impact and the necessity to provide evidence of net benefit. It also contradicts strategic objectives that highlight tourism as a priority growth sector and lacks sufficient evidence for the competent authority to evaluate the economic consequences of the proposal.

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

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fundamentally fails to meet the requirements of sustainable development as outlined by statutory duties, national policy, and evidential standards. This application echoes the critical concerns that led to the refusal of the Lewis Wind Power proposal in 2008, notably the unacceptable scale of industrialisation. The current proposal is presented under a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it still does not adequately address these priorities.

There are significant gaps in the evidential basis for the proposal, including incomplete baseline data and reliance on an undefined design envelope. Furthermore, the application lacks clarity regarding mitigation measures and does not address crucial impact pathways, such as those affecting nocturnal wildlife, the complete onshore infrastructure, and the implications for tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a thorough understanding of the likely significant effects and any residual impacts.

Procedural failures are also evident. The proposal lacks a compliant Island Communities Impact Assessment, violating statutory obligations under the Islands (Scotland) Act 2018. Additionally, the non-disclosure of a full Social Impact Assessment is a significant omission. These shortcomings impede the competent authority's ability to evaluate effects on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

Moreover, the proposal contradicts National Planning Framework 4. It does not sufficiently demonstrate the protection of biodiversity, natural places, and cultural heritage, nor does it provide evidence that health and wellbeing impacts are acceptable. The absence of tourism impact modelling raises questions about the net economic benefit of the project. Furthermore, the cumulative impacts of both offshore and onshore components have not been properly evaluated, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and often inconsistent. The evidential standard required to confidently rule out adverse effects has not been achieved, necessitating

the application of the precautionary principle and preventing any lawful conclusion regarding acceptable impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, combined with policy conflicts and unresolved environmental risks, obstruct a lawful and evidence-based decision. The competent authority is urged to either refuse consent on these grounds or to invoke 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: FEDAA4CA