Member of the public 1393

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. Upon reviewing the Environmental Impact Assessment Report and associated documentation, it is clear that there are significant deficiencies in planning, environmental considerations, cultural aspects, and procedural matters. The project is situated off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. Concerns regarding the scale, proximity, and design of the development raise fundamental questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks an adequate evidential basis necessary for a lawful determination. There is a concerning absence of critical environmental data, and the baseline information provided is limited and inconsistent. Key elements of the proposal remain undefined, and the use of a flexible design framework obscures a clear understanding of the likely significant effects. Furthermore, the reliance on unspecified mitigation measures makes it impossible to assess their effectiveness. Consequently, the documentation fails to provide a comprehensive or informed understanding of the environmental, cultural, or community impacts, while claims regarding negligible or non-significant effects are unsupported by robust evidence.

Additionally, clear and substantive conflicts with policy exist. 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 impact the statutory tests required for consent and compromise the ability of the competent authority to determine the development's acceptability in policy terms.

The scale of this proposal is unprecedented for the area, with large turbines planned to be placed in close proximity to the shoreline, raising significant concerns about landscape capacity, visual dominance, and environmental impact. Collectively, the lack of sufficient information, reliance on undefined mitigation measures, evidential weaknesses, and evident policy non-compliance illustrate that the application is incomplete and unable to support a lawful determination. In light of these circumstances, it is essential that the precautionary principle be applied.

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development on the west coast of the Isle of Lewis poses significant risks to internationally important seabird populations that are already declining. The ornithological assessment associated with this application is fundamentally flawed. It has notable gaps in evidence and internal inconsistencies that seriously undermine its conclusions. The area is known for its key foraging zones and migratory pathways, yet the assessment fails to adequately evaluate the impacts of displacement, collision risk, or habitat loss for these species.

There is a critical contradiction in the application. The developer claims that there will be no significant adverse effects, while also pursuing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that its conclusions are not backed by sufficient evidence.

Furthermore, the assessment does not convincingly show that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will be unaffected. It does not fully consider the importance of these feeding grounds, and its reliance on modelling approaches adds further uncertainty, particularly regarding species in severe decline like Kittiwakes and Fulmars. Methodologies employed appear likely to underestimate mortality rates, especially in situations where baseline data is incomplete and the behavioural responses of the species are not well understood.

The siting of turbines within a known migratory corridor adds another significant risk. This creates a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently analyse the long-term consequences of ongoing mortality in this corridor, nor does it assess the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential requirements needed to affirm no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and limitations in modelling, indicate that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, making it impossible to lawfully conclude in favour of consent.

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

In summary, the assessment is unreliable due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. These issues prevent a thorough evaluation of potential impacts and lead to the overall conclusion that the application does not fulfil the statutory requirements necessary for determination.

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 evaluation of visual, landscape, and seascape impacts lacks thoroughness and does not adequately account for the degree of change or the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by an open Atlantic horizon, an undeveloped nature, and a pronounced sense of remoteness. The planned introduction of large turbines in close proximity to the coast would lead to a continuous and predominant industrial presence, fundamentally altering this character and effecting a permanent and irreversible transformation of the landscape.

Moreover, the application fails to accurately depict the extent of this visual change. The size and location of the turbines would overshadow views from residential properties, historical sites, and frequently visited coastal areas. Consequently, this would adversely affect visual amenity and diminish the inherent qualities of naturalness and remoteness. The assessment does not sufficiently articulate this impact or its importance within the context of such a sensitive landscape.

Concerns also arise from the methodology used in selecting and presenting visual viewpoints. Evidence indicates that the chosen 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 actual visual impact has been understated, thereby compromising the credibility of the assessment.

Additionally, there is a notable deficiency in assessing the interconnectedness of landscape, seascape, and cultural heritage. Notable sites, including the Calanais Standing Stones and other Scheduled Monuments, exist within a broader landscape framework that links them visually and spatially to the Atlantic horizon. The assessment treats these sites as isolated entities rather than acknowledging their interdependence, leading to an incomplete appraisal of their setting and cultural significance.

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

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, particularly concerning the preservation of natural areas and historical assets. The anticipated level of change contradicts the necessity to protect landscape character, visual amenity, and the context of culturally important sites. The lack of a thorough worst-case analysis further diminishes any assertions of compliance with policy.

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

Collectively, the assessment fails to accurately reflect the magnitude of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings inhibit a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

FISHERIES AND MARINE LIFE

The application presents a serious shortfall in assessing the impacts on fisheries and marine life, resulting in an incomplete understanding of the ecological and socio-economic consequences. The coastal waters off West Lewis are home to a vibrant marine ecosystem and an active fishing industry. However, the proposal fails to provide assurance that these essential uses and habitats will be protected from significant disruption.

One critical concern is the flawed assumption that fishing activities can simply be displaced without negative repercussions. The application does not offer any evidence regarding the availability or accessibility of alternative fishing grounds capable of accommodating increased pressure. This lack of information is crucial, as displacing fishing efforts could lead to overfishing in other areas, ultimately affecting the local fleet's economic viability. Without a thorough, evidence-based assessment, the implications for fisheries and local livelihoods remain unclear.

Additionally, the proposal poses considerable risks to marine species, especially due to the underwater noise generated by construction activities. Prolonged hammer piling is anticipated to disturb marine life over extensive distances, impacting species such as dolphins. The projected disturbance to a significant segment of the local bottlenose dolphin population raises alarming issues, yet the application minimises these effects without adequate supporting evidence.

There exists a notable inconsistency within the application, as it acknowledges the necessity for licences to permit harm to European Protected Species, while simultaneously claiming that impacts are negligible. This contradiction diminishes the credibility of the assessment and raises questions about compliance with the Habitats Regulations, particularly when harm is expected to an extent that requires legal authorisation.

Furthermore, the assessment neglects to consider the cumulative impacts from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a comprehensive analysis of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is materially incomplete, failing to account for the full extent of impacts stemming from this single integrated project. The intrinsic link between the offshore turbines and the onshore works is overlooked, leading to a fragmented analysis that obscures the true scale of environmental and socio-economic effects.

Onshore elements encompass cabling across protected moorland, the construction of a substation near Stornoway, and associated access infrastructure traversing sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, thus preventing a complete understanding of the project's overall environmental footprint.

The failure to address or defer the assessment of onshore impacts impedes a proper evaluation of cumulative effects. According to the Environmental Impact Assessment process, all components of a project must be considered collectively; however, the separation of offshore and onshore elements results in a lack of clarity regarding their combined impacts on peatlands, habitats, and communities.

Sensitive habitats, including machair systems and peatland environments that are under policy protection, face significant risks. The application does not provide evidence that impacts on these habitats have been fully assessed or that appropriate avoidance measures have been implemented, highlighting a clear evidential gap concerning biodiversity protection.

Concerns regarding carbon balance also arise from the proposal. Disturbance of peatland leads to the release of stored carbon, which may create a carbon debt that contradicts the goals of renewable energy development. The application falls short of adequately addressing this issue or demonstrating that the overall carbon balance remains beneficial.

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

From a policy standpoint, the failure to consider the project as a whole and demonstrate protection of peatlands, habitats, and land use interests conflicts with the National Marine Plan and National Planning Framework 4. The lack of proof that

impacts can be avoided or mitigated further weakens the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment notably fails to address the crucial elements of dark skies and nocturnal wildlife. The West Lewis coastline is distinguished by its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism potential. The proposal introduces permanent red aviation lighting that would be visible over long distances, resulting in an intrusive “wall of light” effect along the western horizon, thereby fundamentally changing the night-time environment.

The application neglects to evaluate how this lighting would impact visual amenity, landscape character, or the experiences of both residents and visitors. This is particularly significant considering the importance of dark skies to local identity and to emerging sectors like astro-tourism. Consequently, there is a clear gap in the overall landscape and environmental assessment.

More alarmingly, the proposal does not assess the impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly susceptible to artificial lighting due to phototaxis, which can cause disorientation and increase collision risks. The absence of any lighting impact assessment or phototaxis study means that potential effects of aviation lighting on these species and the associated risk of increased mortality have not been considered.

This shortcoming is further exacerbated by the use of daytime survey data in the ornithological assessment, which fails to capture nocturnal activity or the associated risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this risk has gone unassessed. The lack of site-specific night-time data creates a significant gap in understanding the ecological impacts of the proposal.

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

From a policy viewpoint, this omission contradicts the National Planning Framework 4 concerning the protection of natural environments and quality. Moreover, it undermines the comprehensive assessment of landscape and seascape impacts, as the character of night-time environments is an integral aspect of the ecological setting.

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

TOURISM

The application presents significant deficiencies in its assessment of tourism impacts, overlooking the economic and social ramifications for a critical sector of the Isle of Lewis economy. Tourism, which is vital to the area, heavily relies on its wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. Notably, the application states that 86% of visitors are attracted by the scenery. However, it fails to provide a quantified analysis of how the proposed large-scale offshore infrastructure might influence visitor numbers, behaviour, or overall economic contributions to the area.

The tourism sector has seen remarkable growth, escalating 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. Despite this progress, the application does not examine how the anticipated industrialisation of the seascape and a potential decline in environmental quality could affect Tourism Gross Value Added or the broader economic resilience of the region. Without this critical analysis, it remains unclear whether the development would yield a net economic benefit or jeopardise an established and expanding sector.

Moreover, the assessment inadequately addresses the significance of environmental quality in enhancing tourism, particularly the value of unspoiled landscapes and dark skies for visitor experiences. The neglect of a Dark Skies Assessment exacerbates the already substantial gap in understanding the potential impacts on this increasingly recognised segment of the local economy, which includes nature-based and astro-tourism markets.

In an island community characterised by limited economic diversification, the lack of a thorough evaluation of tourism impacts carries broader implications for local employment, businesses, and community sustainability. The omission of a compliant Island Communities Impact Assessment means that these economic vulnerabilities, mandated under the Islands (Scotland) Act 2018, have not been sufficiently considered.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, particularly concerning economic impacts and the necessity to illustrate net benefits. It conflicts with strategic objectives that prioritise tourism as a growth sector and lacks the requisite evidence for the competent authority to assess the economic consequences of the proposal.

Taken as a whole, the failure to quantify tourism impacts, evaluate the environmental factors influencing visitor behaviour, and acknowledge the island's economic

dependencies leads to a significant evidential gap. This gap hinders a comprehensive assessment of the economic effects and reinforces the notion that the application is fundamentally incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm highlights serious deficiencies in meeting the standards of sustainable development, as required by statutory obligations, national policy, and evidential benchmarks. It echoes the critical issues that led to the rejection of the Lewis Wind Power proposal in 2008, when the extent of industrialisation was deemed unacceptable. This current application, while presented under a framework that places increased importance on biodiversity, peatland preservation, landscape integrity, and community welfare, fails to adequately address these priorities.

A reliable evidential foundation for the proposal is noticeably absent. There are significant gaps in baseline data, the design envelope remains undefined, and mitigation measures have not been clearly specified. Additionally, essential impact pathways—including those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism—are overlooked. Consequently, the Environmental Impact Assessment is inadequate, failing to provide a comprehensive understanding of potential significant effects or residual impacts.

Moreover, the process surrounding the application shows clear procedural shortcomings. The lack of a compliant Island Communities Impact Assessment is a breach of statutory duty under the Islands (Scotland) Act 2018, while the failure to present the complete Social Impact Assessment constitutes a critical omission. These issues hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for consideration.

In addition, the proposal contradicts National Planning Framework 4. It does not adequately protect biodiversity, natural environments, or cultural heritage. Furthermore, it fails to demonstrate that health and wellbeing impacts are satisfactory and lacks evidence of net economic benefits, primarily due to insufficient tourism impact modelling. The cumulative effects of both offshore and onshore components have not been thoroughly assessed, leading to a lack of clarity regarding impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain unclear and potentially severe. Evaluations related to marine ecology, seabirds, protected species, and marine mammals are incomplete and occasionally inconsistent. The necessary evidential threshold to eliminate adverse effects beyond reasonable scientific doubt has not been satisfied, which engages the precautionary principle and precludes a lawful conclusion regarding acceptable impacts.

Furthermore, the proposal is set to bring about considerable and irreversible changes

to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, loss of dark skies, disruption of cultural and visual connections, and negative effects on tourism constitute enduring impacts that cannot be mitigated to an acceptable degree.

Overall, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, along with policy inconsistencies and unresolved environmental risks, inhibit a lawful and evidence-based decision. It is imperative that the competent authority either rejects the application on these grounds or utilises the appropriate regulatory measures to obtain the missing information.

As such, we formally request that the application for the Spiorad na Mara Offshore Wind Farm be rejected in its entirety.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 67A329FE

Member of the public 1394

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

Dear Sir/Madam

This letter formally objects to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the marine licensing and Environmental Impact Assessment regimes. The development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The concerns regarding this proposal stem from its scale, proximity, and design, which raise fundamental issues about its alignment with statutory requirements, national policy, and sustainable development principles.

The application presents significant shortcomings, as it lacks an adequate evidential basis for lawful determination. There are critical gaps in environmental data, and the baseline information provided is limited and inconsistent. Moreover, key elements of the proposal remain undefined. The flexible design framework obscures a clear understanding of potential significant effects, and the reliance on unspecified mitigation measures hinders any assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects are not substantiated by robust evidence.

Substantive policy conflicts are evident, as the proposal appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This is particularly relevant to biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not convincingly demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests necessary for consent, undermining the competent authority's ability to determine the development's acceptability in policy terms.

The scale of the proposed development is unprecedented for this location, with large turbines planned in close proximity to the shoreline. This introduces significant concerns related to landscape capacity, visual dominance, and overall environmental impact. When considering the absence of sufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance, it is evident that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks essential transparency and reliability in its account of the likely environmental effects associated with the proposal. It employs a flexible Project Design Envelope, which does not commit to

specific turbine dimensions, layouts, or configurations, leading to considerable uncertainty. This lack of certainty compromises the integrity of the assessment and obscures the actual environmental impacts that may arise from the development. As a result, both the public and the competent authority are left without a clear understanding of the true extent of these effects.

Furthermore, the application depends significantly on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under the premise that any environmental harm will be addressed later prevents a thorough evaluation of the potential effectiveness of these measures and an assessment of residual impacts. This approach defers crucial information to stages following consent, which is procedurally inappropriate and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly established before a decision is made.

There are notable evidential deficiencies present, such as gaps in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. These shortcomings lead to uncertainty about the scale and significance of the impacts, particularly when negligible or non-significant effects are concluded without robust supporting data. The lack of adequate information hampers a comprehensive understanding of cumulative and worst-case impacts, introducing scientific uncertainty that fails to comply with statutory requirements.

Consequently, the application does not satisfy the evidential threshold stipulated under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially regarding protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, particularly in relation to the safeguarding of biodiversity and environmental integrity, as it cannot adequately show that impacts have been fully assessed or that appropriate safeguards are in place.

In summary, the deficiencies arising from the reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data culminate in an Environmental Impact Assessment Report that is both unreliable and incomplete. These issues hinder a lawful and rigorous assessment of environmental effects, leaving the competent authority unable to make a well-informed determination based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is fundamentally flawed and fails to deliver a complete understanding of the ecological receptors present. This region is recognised as a biologically active and sensitive marine system, yet the baseline data provided is insufficient, and the methodologies employed do not adequately capture species presence, behaviours, and habitat usage. Consequently, the assessment lacks a

robust evidential basis for assessing potential impacts.

The assessment's shortcomings are particularly evident regarding otters, a species protected under European law. The application does not appropriately recognise or evaluate their usage of coastal areas for foraging and movement. This oversight neglects to account for their core foraging ranges and behavioural patterns, resulting in a failure to adequately assess the impacts of construction disturbances, noise, and increased human activity. Such omissions undermine any claims concerning the absence of significant effects on otters.

Similarly, the assessment of basking sharks suffers from methodological deficiencies, primarily due to its reliance on aerial surveys that carry significant detection biases, especially under Atlantic conditions. This method is likely to underestimate their presence, particularly when compared to established land-based observations that indicate frequent usage of these waters. The disregard for such data further contributes to an incomplete baseline and diminishes the credibility of the conclusions drawn.

These methodological flaws imply that the assertions of negligible or non-significant effects are based more on assumptions than on solid evidence. The lack of comprehensive baseline data hinders any meaningful evaluation of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. This leaves uncertainties regarding the true extent of risks posed to marine species and habitats.

Regulatory requirements, including those set forth by the Environmental Impact Assessment regime and National Planning Framework 4, are not adequately met in the application, as it has not properly identified or assessed protected species. The uncertainties introduced necessitate the application of the precautionary principle, as it prevents the reasonable exclusion of adverse effects. Thus, consent cannot be lawfully granted under these circumstances.

In summary, the combination of incomplete baseline data, flawed methodologies, and unfounded conclusions culminates in an unreliable assessment. These critical deficiencies inhibit a thorough evaluation of the potential impacts on marine ecology and protected species and substantiate the overall assertion that the application lacks an adequate evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment conducted lacks reliability due to significant internal inconsistencies and methodological weaknesses, which result in a failure to provide adequate evidence. The application does not meet the evidential threshold required to demonstrate that the integrity of protected sites will remain unaffected. Notably, the assessment fails to robustly evaluate the implications of displacement, collision risk, or habitat loss within key foraging areas and migratory pathways located on the west coast of the Isle of Lewis, which supports internationally important seabird populations that are already in decline.

There exists a fundamental contradiction in the application. The developer asserts that no significant adverse effects will occur while simultaneously proposing a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This inconsistency raises questions about the reliability of the assessment and the validity of its conclusions, which are not substantiated by the evidence presented.

Furthermore, the assessment does not sufficiently account for the importance of feeding grounds associated with protected sites, such as the Lewis Peatlands and St Kilda. The reliance on modelling approaches creates uncertainty, particularly for species experiencing severe decline, including Kittiwakes and Fulmars. The methodologies employed may underestimate mortality rates, especially where baseline data is lacking and behavioural responses remain inadequately understood.

The placement of turbines within a recognised migratory corridor introduces a notable risk, as it effectively creates a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor are not adequately addressed in the application, nor are the potential effects on species with relatively small global populations considered.

In light of these deficiencies, the application stands in direct conflict 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 face adverse effects undermines compliance with national policy.

Collectively, these factors contribute to the conclusion that the assessment does not fulfil the statutory requirements necessary to support a determination. The standard of beyond reasonable scientific doubt has not been achieved, thereby engaging the precautionary principle and precluding a lawful conclusion in favour of consent.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment presented fails to adequately recognise the West Lewis coastline as a vibrant cultural landscape where the environment, language, tradition, and community are deeply intertwined. The application adopts a simplistic view, treating heritage merely as a collection of isolated, static entities instead of acknowledging their continuous social, cultural, and spiritual roles within the community.

A significant shortcoming is evident in the handling of culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places for burial and spiritual practices, yet the assessment categorises them as static features, neglecting their ongoing significance and the repercussions of development on their surroundings. This misrepresentation leads to an inadequate evaluation of cultural effects and overlooks their integral role in community life.

Moreover, the assessment neglects to evaluate intangible cultural heritage, such as the

Gaelic language, traditions, and the enduring connection between the community and its coastal environment. These aspects are vital to the area's identity, yet they are entirely omitted from the assessment, representing a major gap. Without addressing these elements, the potential cultural impact of the proposed development cannot be fully comprehended.

There are also pressing issues surrounding community rights and engagement. The Gaelic-speaking population possesses a distinct cultural identity with attributes recognised as characteristic of Indigenous Peoples, but 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 align with established principles of participation concerning decisions that affect cultural and environmental interests.

A crucial procedural oversight is the failure to conduct a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. In the absence of this assessment, the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic effects on the island community. This oversight alone hinders a lawful determination.

From a policy standpoint, these shortcomings put the proposal at odds with National Planning Framework 4, especially regarding the protection of historical assets and places. The inability to consider both tangible and intangible heritage, alongside the neglect of living cultural practices, constitutes a clear deviation from policy obligations.

When taken as a whole, the neglect to assess living heritage, intangible cultural values, community rights, and adherence to statutory requirements creates a substantial evidential void. The cultural impacts of the proposed development remain unassessed, and the application fails to offer a sufficient foundation for determining the genuine cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The non-disclosure of the complete Social Impact Assessment significantly hampers the evaluation of social, economic, and health impacts associated with the proposed development. The competent authority is unable to perform a thorough socio-economic and health evaluation without access to the full report, which is a substantial omission within the application. This failure to provide comprehensive information undermines the Environmental Impact Assessment process.

Available summaries suggest that residents are already feeling measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These observations are based on direct engagement with the community and not mere speculation. However, the lack of transparency regarding the full assessment restricts proper scrutiny of these findings and limits the ability to assess their importance in the decision-making process.

Moreover, there is evidence indicating that the proposal is viewed as a threat to

community identity and cohesion, with “cultural loss” highlighted in the developer’s findings. Despite this recognition, these social impacts have not been adequately incorporated into the main application, nor have they been given the appropriate emphasis. The omission of the complete Social Impact Assessment obscures the true social and human costs of the development.

From a policy standpoint, the application does not adequately demonstrate adherence to the National Planning Framework 4 regarding health and wellbeing. Developments should enhance positive health outcomes and avoid harm, yet the evidence at hand suggests existing adverse effects that have not been fully revealed. Without the complete assessment, the application cannot confirm compliance with this policy.

Ultimately, the failure to disclose the full Social Impact Assessment, coupled with evidence of pre-existing negative impacts, results in an incomplete and unreliable evaluation. This lack of comprehensive information hinders a lawful determination and supports the conclusion that the application lacks sufficient backing.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts lacks depth and does not adequately capture the significant changes expected nor the sensitivity of the surrounding environment. The coastline of West Lewis features an expansive Atlantic horizon, an undeveloped nature, and a strong sense of remoteness. The proposed installation of large turbines near the shoreline would create an overwhelming industrial presence that would fundamentally alter this landscape, leading to a permanent change.

Moreover, the application does not fully convey the extent of this visual alteration. The size and location of the turbines would dominate views from residential properties, historical sites, and popular coastal areas, affecting visual amenity and detracting from the qualities of naturalness and remoteness. The assessment does not effectively demonstrate the impact's significance within such a sensitive landscape.

There are concerns regarding how visual viewpoints were chosen and presented. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly concerning important cultural heritage sites and valued landscapes. This raises the possibility that the visual impact has been underestimated, questioning the assessment's reliability.

Another significant shortcoming is the failure to evaluate the interconnectedness of landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape connected to the Atlantic horizon through visual and spatial relationships. The assessment regards these sites as separate entities rather than acknowledging their interdependence, resulting in an incomplete understanding of the impacts on their setting and cultural value.

The industrialisation of the seascape would disrupt these relationships, altering how

heritage sites are perceived and severing their connection to the natural horizon. This results in both visual and broader cultural harm that has not been adequately evaluated in the application.

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

It is also evident that the identified impacts cannot be sufficiently mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelming and unavoidable. The resulting change is therefore substantial and enduring, rather than something that could be reduced to an acceptable level through mitigation efforts.

In summary, the assessment fails to accurately reflect the extent of the impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings hinder a dependable evaluation and reinforce the conclusion that the proposal does not align with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline is characterised by clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. The current proposal entails 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 potential environmental effects. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans provided in the application, which instead relies on mitigation and contingency measures that are to be prepared post-consent. This reliance on undefined future measures raises significant concerns regarding the sensitivity of the receiving environment.

The application does acknowledge risks such as sediment mobilisation and accidental chemical or oil spills but fails to deliver adequate information on how these risks will be prevented, controlled, or monitored. Moreover, there is uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts, which include potential effects on marine species and habitats already recognised as sensitive within the broader assessment.

Furthermore, the absence of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning until after consent, the application obstructs any evaluation of whether suitable safeguards are in place to address pollution events. This introduces procedural risk and undermines 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 requirements of the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation are assessed before consent; the omission of such information renders a lawful determination unfeasible. Additionally, the application 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 concerning potential impacts result in a materially deficient assessment. These inadequacies hinder a thorough evaluation of construction and pollution risks and substantiate 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 proposal includes onshore infrastructure that is assessed separately from offshore turbines. This fragmented approach fails to capture the full extent of impacts from what is a single integrated project. The onshore elements consist of cabling across protected moorland, the construction of a substation near Stornoway, and access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which is an important carbon store and ecologically sensitive habitat. The application does not provide a thorough assessment of these impacts, limiting the understanding of the project's overall environmental footprint.

By deferring the assessment of onshore impacts, the application undermines the evaluation of cumulative effects. The Environmental Impact Assessment process requires all project components to be considered together. However, by treating the offshore and onshore elements separately, the combined effects on peatlands, habitats, and local communities are not fully comprehended.

There are significant risks to sensitive habitats, including machair systems and peatland environments that are protected by policy. The application does not adequately demonstrate that impacts on these habitats have been assessed or that avoidance measures have been implemented. This results in a clear evidential gap concerning biodiversity protection.

Concerns also arise regarding carbon balance. Disturbance of peatland can release stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy development. The application does not sufficiently address this issue or show that the overall carbon balance remains advantageous.

Moreover, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application lacks evidence that necessary consents or processes have been initiated, which raises questions about its feasibility and legality.

From a policy standpoint, the failure to assess the project as a whole and to

demonstrate the protection of peatlands, habitats, and land use interests is in conflict with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further weakens the application.

Overall, the separation of project components, the absence of comprehensive assessment, and the lack of evidence regarding environmental and land use impacts render this part of the application incomplete and unreliable, which obstructs 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 fundamentally alters the night-time environment of the West Lewis coastline, which is characterised by exceptionally dark skies that contribute to environmental quality, cultural identity, and tourism value.

An Environmental Impact Assessment for this application notably lacks an evaluation of the impacts on visual amenity, landscape character, and the experiences of both residents and visitors. This gap is particularly concerning given the significance of dark skies to the area’s identity and the potential for emerging tourism sectors, such as astro-tourism. The absence of such assessments creates a clear deficiency in the overall landscape and environmental evaluation.

Furthermore, there is no examination of the effects of this artificial lighting on nocturnal wildlife. Species that are particularly sensitive to artificial lighting, such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel, may experience disorientation and increased collision risks due to phototaxis. The application does not include a lighting impact assessment or a phototaxis study, which means it fails to evaluate how aviation lighting could impact these species or lead to higher mortality rates.

This issue is exacerbated by the reliance on daytime survey data for the ornithological assessment, which does not account for nocturnal activities and the associated risks. Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this risk remains unassessed. The lack of site-specific night-time data creates a critical gap in understanding the ecological impacts of the proposal.

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

From a policy standpoint, this omission contradicts the National Planning Framework 4 regarding the protection of natural places and environmental quality. It undermines the

broader evaluation of landscape and seascape impacts, as the character of the night-time environment is a vital component of the overall ecosystem.

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

TOURISM

The application inadequately assesses the impacts on tourism, which is vital to the economy of the Isle of Lewis. This sector relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. While the application recognises that 86% of visitors are attracted by the scenery, it fails to quantify how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism has witnessed substantial growth, increasing from £65 million in 2017 to over £81.5 million and supporting more than 1,000 jobs, representing up to 16% of the island's economy. Nevertheless, the application does not analyse how the industrialisation of the seascape and degradation of environmental quality could affect Tourism Gross Value Added or the broader economic resilience. Without such an analysis, it remains unclear whether the development would yield a net economic benefit or threaten an established and expanding sector.

Furthermore, the role of environmental quality in bolstering tourism is not addressed. The significance of unspoiled landscapes and dark skies in enhancing visitor experiences and emerging markets, such as nature-based tourism and astro-tourism, is overlooked. The lack of a Dark Skies Assessment exacerbates this issue, creating a considerable gap in understanding the impacts on this recognised and growing segment of the local economy.

The implications of failing to assess tourism impacts extend beyond the sector itself, affecting employment, local businesses, and the sustainability of the community within this island context that has limited economic diversification. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been adequately evaluated as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not convincingly demonstrate adherence to the National Planning Framework 4, particularly regarding economic impact and the necessity to show net benefit. It also conflicts with strategic objectives that highlight tourism as a priority growth sector, failing to provide sufficient evidence for the competent authority to assess the economic ramifications of the proposal.

In summary, the shortcomings in quantifying tourism impacts, the neglect to assess the environmental factors influencing visitor behaviour, and the disregard for the island's

economic dependency culminate in a significant evidential gap. This deficiency hampers a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the standards of sustainable development when evaluated against statutory duties, national policy, and evidential benchmarks. This application revisits the primary concerns that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. The current proposal emerges under a more robust policy framework that places increased emphasis on biodiversity, peatland conservation, landscape integrity, and community wellbeing.

A thorough and reliable evidential basis for the determination of this application is not provided. There exist critical gaps in the baseline data, the use of an undefined design envelope, and a reliance on unspecified mitigation measures. Additionally, there is a significant omission of crucial impact pathways, including those affecting nocturnal wildlife, comprehensive onshore infrastructure, and the implications for tourism. Consequently, the Environmental Impact Assessment remains incomplete, hindering a full understanding of likely significant effects and residual impacts.

Furthermore, procedural shortcomings are evident. The lack of a compliant Island Communities Impact Assessment constitutes a violation of statutory duty under the Islands (Scotland) Act 2018. The failure to present a complete Social Impact Assessment further represents a material omission. These shortcomings inhibit the competent authority from evaluating the impacts on community wellbeing, cultural identity, and economic resilience, thereby rendering the application unfit for determination.

The proposal stands in direct opposition to the National Planning Framework 4. It fails to demonstrate adequate protection for biodiversity, natural landscapes, and cultural heritage, does not prove that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit due to the absence of modelling on tourism impacts. The cumulative effects of both offshore and onshore elements have not been adequately assessed, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in certain instances, inconsistent. The evidential threshold needed to rule out adverse effects beyond reasonable scientific doubt has not been fulfilled, invoking the precautionary principle and obstructing a lawful conclusion regarding the acceptability of impacts.

Additionally, the proposal would bring about considerable and irreversible changes to a

highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruptions to cultural and visual relationships, and the impacts on tourism signify permanent effects that cannot be mitigated to an acceptable level.

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

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

Additional Comments

A massive impact on current way of life, nature & tourism 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: 6851297F

Member of the public 1395

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 review of the Environmental Impact Assessment Report and its supporting documentation has revealed material deficiencies in planning, environmental considerations, cultural impacts, and procedural compliance. The development site, located off the west side of the Isle of Lewis, is characterised by an Atlantic-facing coastline, a near-pristine environment, and a rich cultural identity. The scale and proximity of the proposed turbines, along with the design, raise serious concerns about compatibility with statutory requirements, national policy, and the principles of sustainable development.

The application does not provide a robust evidential basis for a lawful determination. Key environmental data is absent, baseline information is inadequate and inconsistent, and essential elements of the proposal remain undefined. The flexible design framework employed limits the understanding of likely significant effects, and the reliance on unspecified mitigation measures renders it impossible to assess their effectiveness. Consequently, the documentation fails to offer a full or informed understanding of the potential environmental, cultural, or community impacts, undermining claims of negligible or non-significant effects, which lack solid evidence.

There are evident and substantial conflicts with policy. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate adherence to national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests for consent and compromise the competent authority's ability 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 regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, dependence on undefined mitigation measures, evidential weaknesses, and clear non-compliance with policy indicates that the application is incomplete and cannot support a lawful determination. In such circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

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

Due to these deficiencies, the application does not meet the evidential threshold required under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. The precautionary principle must be applied, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate compliance with National Planning Framework 4, particularly in relation to biodiversity protection and environmental integrity, as it has not been shown that impacts have been thoroughly assessed or that suitable safeguards are established.

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

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 application fails to meet the evidential threshold necessary to confirm no adverse effect on the integrity of protected sites. It contains significant gaps in evidence and presents internal inconsistencies that undermine its conclusions. The assessment does not adequately address the implications of displacement, collision risk, or habitat loss, particularly given the development's location within key foraging areas and migratory pathways.

Seabird populations on the west coast of the Isle of Lewis are internationally important and many are in decline. The assessment does not convincingly demonstrate that these species will remain unaffected, particularly the Kittiwakes and Fulmars, which are already in severe decline. The reliance on modelling approaches leads to uncertainty, especially where baseline data is incomplete. Furthermore, the siting of turbines in a recognised migratory corridor presents a significant risk, creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland.

A fundamental contradiction arises in the application when the developer concludes no significant adverse effects, while also making a Habitats Regulations derogation case that is only warranted when significant harm is expected. This inconsistency raises questions about the reliability of the assessment and suggests that its conclusions are not backed by adequate evidence.

From a regulatory standpoint, the shortcomings in the assessment represent a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The presence of contradictory conclusions, coupled with data gaps and modelling limitations, 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.

In summary, the assessment is unreliable due to internal inconsistencies, methodological weaknesses, and insufficient evidence. These deficiencies hinder a proper evaluation of impacts and contribute to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, seascape, and landscape is significantly lacking, failing to capture the scale of change and the sensitivity of the environment. The coastline of West Lewis is characterised by its unspoilt Atlantic horizon and a pronounced sense of remoteness. The proposed large-scale turbines, situated in close proximity to the shoreline, would introduce a continuous industrial presence, fundamentally changing this character and resulting in a permanent alteration of the landscape.

The application inadequately portrays the extent of this visual change. Due to their scale and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations, adversely affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment does not effectively communicate the significance of this impact within such a sensitive landscape.

Concerns are raised regarding the methodology used in selecting and presenting visual viewpoints. It appears that these viewpoints do not adequately reflect the most sensitive receptors or the worst-case scenarios, especially regarding important cultural heritage sites and high-value landscapes. This possibility raises doubts about the

accuracy of the visual impact assessment, suggesting it may have been understated.

Additionally, the assessment neglects to consider the interconnectedness of landscape, seascape, and cultural heritage. Significant sites, including the Calanais Standing Stones and other Scheduled Monuments, exist within a broader landscape that is visually and spatially linked to the Atlantic horizon. The failure to acknowledge their interdependence leads to an incomplete understanding of the impacts on their setting and cultural significance.

The anticipated industrialisation of the seascape would disrupt these connections, altering how heritage assets are experienced and affecting their relationship with the natural horizon. This represents not just a visual impact, but a deeper cultural and spatial harm that remains unaddressed in the application.

From a policy standpoint, the proposal is at odds with National Planning Framework 4 regarding the protection of natural places and historic assets. The magnitude of change proposed is not aligned with the requirements to preserve landscape character, visual amenity, and the context of culturally significant sites. Moreover, the lack of a thorough worst-case scenario assessment further weakens any assertions of compliance with policy.

It is evident that the impacts highlighted cannot be effectively mitigated. The sheer scale, height, and proximity of the turbines would ensure that their presence remains dominant and unavoidable. The resulting transformation is fundamentally permanent and cannot be reduced to an acceptable level through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal's evaluation of construction and pollution risks lacks comprehensiveness, preventing a thorough assessment of its likely environmental impacts. It entails significant seabed preparation and installation works in a challenging Atlantic environment, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application relies on mitigation and contingency measures that are to be formulated after consent is granted, which hinders any meaningful appraisal of their effectiveness.

This reliance on unspecified future measures raises serious concerns, especially given the sensitivity of the receiving environment. The coastline of West Lewis features clean coastal waters and vital habitats that are susceptible to disturbances from sediment and contamination. While the application acknowledges risks like sediment mobilisation and possible chemical or oil spills, it fails to provide adequate details on prevention, control, or monitoring strategies for these risks.

Additionally, there is uncertainty surrounding the scale and behaviour of sediment plumes that may result from seabed disturbances and cable installations. In the absence of robust modelling and well-defined management strategies, it remains impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty similarly extends to potential repercussions for sensitive marine species and habitats already noted in the broader assessment.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent, the application obstructs the evaluation of whether suitable measures exist to address pollution incidents. This not only introduces procedural risks but also undermines the competent authority's capacity to evaluate environmental protection measures at the determination stage.

From a regulatory standpoint, deferring critical environmental safeguards contradicts the obligations set forth by the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be evaluated prior to granting consent, and without this essential information, a lawful decision cannot be reached. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the absence of defined mitigation strategies, insufficient detailed management plans, and the uncertainty surrounding potential impacts collectively render the assessment materially deficient. These shortcomings hinder a rigorous evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal presents significant shortcomings in its assessment of marine life and fisheries, leading to an incomplete understanding of ecological and socio-economic implications. The waters off the West Lewis coast are known for both their rich marine ecosystem and an active fishing industry. However, the application fails to adequately demonstrate that these essential uses and habitats will be safeguarded against substantial disruption.

A critical concern arises from the unfounded assumption that fishing activities can be relocated without adverse effects. There is no evidence provided that alternative fishing grounds exist or can support the increased pressure that displacement would entail. This lack of information is crucial, as such displacement poses a risk of overfishing in other areas and could have broader economic repercussions for the local fishing fleet. Without a thorough, evidence-based assessment, the potential impacts on fisheries and local livelihoods remain unclear.

Moreover, the proposal poses significant risks to marine species, particularly due to the underwater noise produced during construction. The high-energy hammer piling expected over an extended period is likely to disturb a wide area, negatively affecting

species such as dolphins. The anticipated disturbance to a considerable portion of the local bottlenose dolphin population raises substantial concerns, yet the application seems to minimise these impacts without adequate supporting data.

Additionally, the application demonstrates a notable inconsistency in its acknowledgment of the need for licences to permit harm to European Protected Species while simultaneously claiming that these impacts are negligible. This contradiction undermines the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially in situations where harm is expected to necessitate legal authorisation.

The failure to consider cumulative impacts from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities, further complicates the assessment. Without a thorough evaluation of these interconnected effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not satisfy the requirements set forth in the National Planning Framework 4 or the National Marine Plan. It does not establish that the development can coexist with current marine users or avert unacceptable impacts on marine biodiversity, hindering any conclusion that the proposal aligns with sustainable development principles.

In summary, the deficiencies in the evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal contradictions within the application render the assessment incomplete and unreliable. These issues obstruct a comprehensive evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

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

Furthermore, the exclusion or deferral of assessing onshore impacts compromises the evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered in unison; however, the distinct

assessment of offshore and onshore elements fails to account for the combined impacts on peatlands, habitats, and local communities. This separation raises concerns regarding sensitive habitats, including machair systems and peatland environments that are already protected by policy. The application does not adequately demonstrate that the impacts on these habitats have been fully assessed or that appropriate avoidance measures are in place, resulting in a significant evidential gap concerning biodiversity protection.

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal introduces permanent red aviation lighting that will be visible over long distances, creating a continuous and intrusive “wall of light” effect across the western horizon. This alteration fundamentally affects the night-time environment of the West Lewis coastline, which is distinguished by exceptionally dark skies that contribute significantly to environmental quality, cultural identity, and tourism value.

The Environmental Impact Assessment fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. Given the importance of dark skies to the area’s identity and to emerging tourism sectors, such as astro-tourism, this omission is significant and results in a clear gap in the overall landscape and environmental assessment.

Moreover, there is no evaluation of the impacts on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are notably sensitive to artificial lighting due to phototaxis, which can cause disorientation and increased collision risk. The application lacks a lighting impact assessment or a phototaxis study, failing to assess how aviation lighting may affect these species or potentially increase

mortality rates.

The reliance on daytime survey data in the ornithological assessment does not adequately capture nocturnal activity or the associated risks. Species such as Kittiwakes, which may forage or migrate at night, are also vulnerable to disorientation from artificial lighting, yet the risk remains unassessed. The absence of site-specific night-time data presents a critical gap in understanding ecological impacts.

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

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

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

TOURISM

The Isle of Lewis sees tourism as a critical component of its economy, with the sector having expanded from £65 million in 2017 to over £81.5 million, providing more than 1,000 jobs and constituting up to 16% of the local economy. Despite the significance of this industry, the assessment of tourism impacts within the application is inadequate, particularly regarding the social and economic consequences for this key sector. It is noted that 86% of visitors are attracted by the area's scenic beauty, yet there is no quantifiable analysis of how the introduction of large-scale offshore infrastructure might influence visitor numbers, behaviours, or their overall economic contributions.

Furthermore, the assessment overlooks the crucial relationship between environmental quality and tourism, disregarding how unspoiled landscapes and dark skies enhance visitor experiences and appeal to growing markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortfall, creating a substantial gap in understanding the impacts on an increasingly important segment of the local economy.

The implications of this oversight are considerable, especially for an island community that relies heavily on tourism due to limited economic diversification. The failure to evaluate tourism impacts carries broader consequences for employment, local businesses, and the sustainability of the community. Notably, the absence of a compliant Island Communities Impact Assessment means these economic

vulnerabilities have not been properly assessed, as mandated under the Islands (Scotland) Act 2018.

On a policy level, the application does not demonstrate adherence to the National Planning Framework 4, particularly regarding economic impact and the requirement for a net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector, failing to provide adequate evidence for the competent authority to evaluate the economic consequences of the proposed development.

The cumulative effect of not quantifying tourism impacts, neglecting the environmental factors that influence visitor behaviour, and overlooking the island's economic dependency results in a significant evidential gap. This deficiency hampers a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the 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.

Additional Comments

This is the most appalling prospect for the Island and has been a done deal since the beginning.
No one seems to be waking up to the environmental impact. The EIA that has been conducted is woefully inadequate.
This is a pristine, fragile environment. Don't ruin it for the benefit of the hedge fund managers and the Crown estate.

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: E6D7157B

Member of the public 1396

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. My concerns arise from a thorough review of the Environmental Impact Assessment Report and the accompanying documentation, which reveal serious deficiencies in planning, environmental considerations, cultural aspects, and procedural compliance. The proposed development is set to take place off the west side of the Isle of Lewis, a region celebrated for its Atlantic-facing coastline, nearly untouched environment, and rich cultural heritage. The scale and design of this proposal raise urgent questions about its adherence to statutory requirements, national policy, and the principles that underpin sustainable development.

The application lacks a sufficient evidential foundation necessary for a lawful determination. There is a notable absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Key elements of the proposal remain undefined, with a flexible design framework inhibiting a clear understanding of potential significant effects. Furthermore, the reliance on unspecified mitigation measures raises questions about their effectiveness, leaving the documentation inadequate for a comprehensive understanding of the environmental, cultural, or community impacts. Consequently, claims of negligible or non-significant effects lack robust supporting evidence.

Substantial policy conflicts are evident as well. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment requirements, or National Planning Framework 4. This inconsistency is particularly prominent concerning biodiversity, natural spaces, cultural heritage, and health and wellbeing. The application fails to prove that it meets national obligations for the protection of biodiversity, climate interests, and environmental integrity. These conflicts undermine the ability of the competent authority to assess the acceptability of the development within policy parameters.

The scale of this proposal is unprecedented for this area, with large turbines being positioned alarmingly close to the shoreline, thereby raising significant concerns about the landscape's capacity, visual impact, and overall environmental effects. When considered collectively, the lack of adequate information, dependence on undefined mitigation measures, evidential weaknesses, and clear non-compliance with policy all indicate that the application is incomplete and unfit for a lawful determination. Under these circumstances, it is imperative that the precautionary principle be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary rigor and completeness, failing to deliver a full and transparent account of the potential environmental effects associated with the proposal. The reliance on a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, introduces a high degree of uncertainty. This approach undermines the reliability of the assessment, as it is impossible to ascertain a worst-case scenario. As a result, the impacts presented may not accurately reflect the actual development, thereby preventing both the public and the competent authority from grasping the true extent of environmental effects.

Furthermore, the application depends significantly on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under such conditions implies that any environmental harm will be addressed after approval, which obstructs a meaningful evaluation of effectiveness or the assessment of residual impacts. This postponement of crucial information to post-consent stages is procedurally unacceptable and contradicts the fundamental objectives of the Environmental Impact Assessment regime, which stipulates that significant effects and mitigation must be clearly established prior to any decision.

Additionally, there are considerable evidential gaps, including deficiencies in baseline data, limitations in methodology, and a reliance on assumptions rather than site-specific evidence. These issues contribute to uncertainty surrounding the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are drawn without adequate supporting data. The lack of comprehensive information hampers a clear understanding of cumulative and worst-case impacts, resulting in scientific uncertainty that cannot align with statutory obligations.

Consequently, the application does not meet the evidential standards required by the Habitats Regulations, failing to exclude adverse effects beyond reasonable scientific doubt. This scenario triggers the precautionary principle, particularly concerning protected species and sensitive habitats. Moreover, the proposal does not demonstrate adherence to National Planning Framework 4, including obligations relating to 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 an undefined design envelope, the absence of specified mitigation measures, and gaps in baseline data culminate in an unreliable and incomplete Environmental Impact Assessment Report. These shortcomings hinder a lawful and robust evaluation of environmental effects, leaving the competent authority unable to make an informed determination 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 inadequate assessment of alternatives. Rather than

offering a structured comparison of viable alternatives based on environmental impacts, it provides a narrative detailing the project's evolution. This method does not sufficiently demonstrate that less harmful options have been identified, evaluated, and chosen over more damaging ones.

There is a lack of transparent and evidence-based analysis regarding alternative offshore locations, scales of development, or design configurations. Specifically, the application does not indicate that the developer has meaningfully considered the potential of placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts could be lessened. Given the sensitivity of the West Lewis coastline, the crucial importance of proximity to shore in assessing impacts makes this absence of analysis particularly significant and obstructs any conclusion that the proposed siting is the least damaging available option.

These shortcomings also extend to the assessment of cable routing and landfall, as there is insufficient evidence demonstrating that alternative routes have been adequately explored to 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 mitigation by design has not been employed, with an overreliance on post-design mitigation measures instead.

Consequently, the application does not show 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, preventing the competent authority from determining 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 compliant solution according to policy standards.

From a policy viewpoint, this inadequacy undermines adherence to National Planning Framework 4, particularly regarding the protection of natural environments, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment constitutes a material omission, contributing to the overall conclusion that the application has not been adequately evaluated and cannot facilitate a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The coastal environment of West Lewis represents a highly sensitive and biologically active marine system. However, the assessment of marine ecology and protected species is materially deficient, providing an incomplete and unreliable understanding of ecological receptors. The methodologies employed do not adequately capture important aspects such as species presence, behaviour, and habitat use. Consequently, the assessment fails to provide a sound evidential basis for evaluating impacts.

One significant oversight is the treatment of otters, which are a European Protected Species. The application does not properly recognise or assess their active use of coastal areas for foraging and movement. This lack of consideration for their core foraging range and behavioural patterns means the potential effects of construction disturbance, noise, and increased activity have not been sufficiently assessed. Such shortcomings undermine any conclusions regarding the absence of significant effects on this species.

The assessment of basking sharks also reveals significant deficiencies, particularly due to the reliance on aerial surveys that introduce detection bias, especially in Atlantic conditions. This methodological approach likely underestimates the presence of basking sharks when compared to established land-based observations indicating their frequent use of these waters. The failure to incorporate relevant data results in an incomplete baseline, weakening the reliability of the conclusions drawn.

These methodological limitations lead to conclusions of negligible or non-significant effects that are based more on assumptions than on robust evidence. The absence of sufficient baseline data further prevents a meaningful assessment of cumulative and indirect impacts, including seasonal variations and wider ecosystem interactions. This creates uncertainty regarding the true scale of risk to marine species and habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application fails to meet the evidential threshold required to conclude that there will be no adverse effect on the integrity of protected sites. Significant gaps in evidence and internal inconsistencies within the ornithological assessment undermine its conclusions. There is a fundamental contradiction in the application, as the developer asserts no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only necessary where significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment and suggests that its conclusions are unsupported by the evidence presented.

Furthermore, the assessment does not provide sufficient evidence that seabirds associated with protected sites such as the Lewis Peatlands and St Kilda will remain

unaffected. The importance of these feeding grounds is not fully considered, and the reliance on modelling approaches introduces uncertainty, particularly for species that are already in severe decline, such as Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, especially in instances where baseline data is incomplete and behavioural responses are not entirely understood.

The siting of turbines within a recognised migratory corridor introduces a significant risk by effectively creating a barrier in a primary flight path utilised by species travelling between the United Kingdom and Iceland. The assessment does not adequately evaluate the long-term implications of sustained mortality within this corridor or the potential effects on species with small global populations.

From a regulatory perspective, the presence of contradictory conclusions, data gaps, and limitations in modelling means the standard of beyond reasonable scientific doubt has not been achieved. This situation engages the precautionary principle and obstructs a lawful conclusion in favour of consent. The deficiencies identified indicate 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 rendered unreliable due to internal inconsistencies, methodological weaknesses, and a lack of sufficient evidence. These shortcomings prevent a thorough evaluation of impacts and contribute to the conclusion that the application does not meet the statutory requirements necessary for a proper determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the proposal significantly underrepresents the cultural heritage and community identity associated with the West Lewis coastline. This region is not merely a collection of static assets but a vibrant cultural landscape where environment, language, tradition, and community are deeply intertwined. The application adopts a narrow perspective, failing to recognise the ongoing social, cultural, and spiritual roles that heritage sites play within the community.

Particularly concerning is the treatment of key culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active places of burial and spiritual practice, yet they are inaccurately classified as static features in the assessment. This oversight neglects their continued significance and the potential impacts of development on their surroundings, leading to a limited understanding of the cultural effects and their importance in community life.

Furthermore, the assessment disregards the intangible aspects of cultural heritage, including the Gaelic language and local traditions, as well as the longstanding relationship the community shares with the coastal environment. These elements are vital to the identity of the area, but they are entirely omitted from the evaluation,

representing a major oversight. The cultural impacts of the development cannot be adequately assessed without incorporating these factors.

There are additional concerns about community rights and engagement, particularly regarding the Gaelic-speaking population, which embodies a distinct cultural identity characteristic of an Indigenous People. The absence of a process for Free, Prior and Informed Consent raises questions about the validity of the assessment and fails to align with established principles of meaningful participation in decisions that affect cultural and environmental interests.

Moreover, the lack of a compliant Island Communities Impact Assessment is a significant procedural failure. Under the Islands (Scotland) Act 2018, this assessment is a statutory requirement that allows the competent authority to fulfil its legal obligation to consider the social, cultural, and economic impacts on the island community. The absence of this critical evaluation precludes a lawful determination of the proposal.

From a policy standpoint, the identified deficiencies contradict the National Planning Framework 4, especially concerning the safeguarding of historic assets and places. The neglect to consider both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, marks a clear deviation from policy mandates.

In summary, the lack of assessment regarding living heritage, intangible cultural value, community rights, and adherence to statutory obligations creates a significant evidential gap. The cultural impacts associated with the proposed development remain inadequately evaluated, and the application does not furnish a sufficient basis for understanding the true cultural costs involved.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The transparency surrounding the assessment of social impacts, health, and wellbeing is critically lacking, resulting in a deficient evaluation. The developer undertook a Social Impact Assessment that included focus groups with local residents; however, the complete report remains unpublished. This significant evidential gap hinders both the public and the competent authority from fully grasping the social risks highlighted by the developer's own research.

Residents are reportedly experiencing stress, anxiety, and concern due to the scale and proximity of the proposed development. These effects are based on direct engagement, rendering them non-speculative. Nevertheless, the failure to disclose the full assessment limits proper scrutiny of these findings and obstructs the ability to evaluate their relevance in the decision-making process.

Moreover, there is evidence that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" identified in the developer's findings. Unfortunately, these significant impacts have not been sufficiently integrated into the primary application or afforded the necessary consideration. The withholding of the complete Social Impact Assessment obscures the true social and human 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 the character and functioning of the community could be at stake. The failure to provide the full dataset means that the application does not offer a complete evidential basis for evaluating the balance between benefits and potential harm.

From a policy standpoint, the application does not comply with National Planning Framework 4 regarding health and wellbeing. Development should facilitate positive health outcomes and mitigate harm; yet, the evidence available suggests existing adverse effects that have not been thoroughly disclosed. Without the complete assessment, demonstrating compliance with this policy is impossible.

The procedural implications are considerable. The competent authority cannot conduct a robust socio-economic and health evaluation without access to the entire Social Impact Assessment. This omission is significant within the application and constitutes a failure to meet the evidential standards required by the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual and landscape impacts associated with the proposed turbines is significantly inadequate, failing to accurately capture the scale of change and the sensitivity of the West Lewis coastline. This area is characterised by its unspoilt Atlantic horizon, natural landscape, and a profound sense of remoteness. The proposed large-scale turbines, situated close to the shoreline, would introduce a pervasive industrial presence that would fundamentally change this character, leading to an irreversible transformation of the landscape.

The application does not effectively represent the extent of the visual changes anticipated. The size and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and undermining the defining qualities of naturalness and remoteness. The assessment inadequately conveys the significance of these impacts in the context of such a sensitive landscape.

Moreover, there are serious methodological issues concerning the selection and presentation of visual viewpoints. It appears that the chosen viewpoints do not adequately represent the most sensitive receptors or the worst-case scenarios, particularly regarding cultural heritage sites and high-value landscapes. This raises

concerns that the magnitude of visual impact has been understated, thereby compromising the assessment's reliability.

Another critical oversight is the lack of consideration for the interconnectedness of landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are integral to a wider landscape that is visually and spatially linked to the Atlantic horizon. The assessment treats these heritage assets in isolation, disregarding their interdependence, which results in a partial evaluation of the impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would sever these important relationships, altering how heritage assets are perceived and disrupting their connection to the natural horizon. This not only represents a visual issue but also inflicts broader cultural and spatial damage, which has not been sufficiently evaluated in the application.

From a policy standpoint, this proposal contravenes the National Planning Framework 4, particularly regarding the protection of natural landscapes and historic assets. The extent of the proposed changes is inconsistent with the requirement to preserve landscape character, visual amenity, and the settings of culturally significant sites. Additionally, the lack of a thorough worst-case assessment further diminishes any claims of compliance with policy guidelines.

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

In summary, the assessment fails to accurately portray the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings hinder a reliable evaluation and strongly indicate that the proposal is incompatible with the necessary protections for 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 vibrant marine ecosystem and a thriving fishing industry. However, the application does not adequately address the ecological and socio-economic impacts on these vital resources. It lacks a robust evaluation and fails to demonstrate how the fishing activity and habitats can be preserved without significant disruption.

A critical concern is the assumption that fishing can be displaced without negative consequences. The application offers no evidence that alternative fishing grounds are available or capable of absorbing the additional pressure from displaced activities. This is a serious oversight, as displacement could lead to overfishing in other areas and adversely affect the local fishing fleet's economic stability. Without a clear and evidence-based assessment, the implications for fisheries and local livelihoods remain unclear.

Moreover, the proposal poses substantial risks to marine species, particularly due to the underwater noise generated during construction. The high-energy hammer piling expected over an extended period is likely to disturb marine life across considerable distances, potentially impacting species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is concerning, yet the application downplays these effects without providing sufficient evidence.

There is a notable inconsistency within the application regarding the need for licences for harm to European Protected Species while simultaneously asserting that the impacts are negligible. This contradiction raises significant questions about the credibility of the assessment and compliance with the Habitats Regulations, especially where harm necessitates legal authorisation.

Additionally, the assessment neglects to account for cumulative impacts from various pressures, including habitat disturbance, noise, and the displacement of fishing activity. Without an exhaustive evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions cannot be fully understood.

From a policy standpoint, the application fails to demonstrate alignment with National Planning Framework 4 or the National Marine Plan. It does not show that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thus precluding any assertion that the proposal represents sustainable development.

In summary, the deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions render the assessment inadequate and untrustworthy. These shortcomings inhibit a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the project lacks completeness, particularly concerning onshore infrastructure, which is critical to understanding the overall impacts of the integrated project. The offshore turbines and onshore works are interrelated, yet the assessment treats them as separate entities. This fragmented approach obscures the comprehensive scale of environmental and socio-economic effects associated with the project.

The onshore components consist of cabling that crosses protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. Notably, these activities entail excavation in areas of deep peat, especially within Barvas Moor, which serves as a significant carbon store and is an ecologically delicate habitat. The application falls short of delivering a thorough assessment of these impacts, which is essential for fully grasping the project's environmental footprint.

By omitting or delaying the evaluation of onshore impacts, the application hampers the assessment of cumulative effects. The Environmental Impact Assessment (EIA) process mandates that all elements of a project be considered collectively. The current separation between offshore and onshore components means that the combined effects on peatlands, habitats, and local communities remain inadequately understood.

Moreover, there are considerable risks to sensitive habitats, such as machair systems and peatland environments, which are subject to policy protection. The proposal does not sufficiently demonstrate that impacts on these habitats have been fully assessed or that suitable avoidance measures have been implemented, leading to a clear evidential gap regarding biodiversity protection.

Concerns also arise regarding carbon balance. Disturbing peatland releases stored carbon, potentially generating a carbon debt that contradicts renewable energy development goals. The application fails to sufficiently address this issue or prove that the overall carbon balance is favourable.

Additionally, routing infrastructure through active croft land raises potential conflicts with current land use and legal rights. There is no evidence provided that the requisite consents or processes have been initiated, which brings into question the deliverability and lawful execution of the project.

From a policy standpoint, the failure to evaluate the project in its entirety and to 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 weakens the application further.

Overall, the separation of project components, the lack of a comprehensive assessment, and the absence of evidence concerning environmental and land use impacts render this aspect of the application incomplete and unreliable. This inadequacy impedes a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife represents a significant oversight within the Environmental Impact Assessment. The West Lewis coastline boasts remarkably dark skies, which are vital to the area's environmental quality, cultural identity, and tourism potential. The proposal includes the installation of permanent red aviation lighting that will be visible over extensive distances, leading to a continuous and intrusive “wall of light” effect on the western horizon, fundamentally changing the night-time landscape.

Moreover, the application fails to evaluate the implications of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This lack of consideration is particularly concerning given the critical role dark skies play in the identity of the area and the growth of sectors such as astro-tourism. The resulting

gap in the overall assessment of the landscape and environment is evident.

Equally troubling is the absence of an evaluation of the impacts on nocturnal wildlife. Notably, species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can cause disorientation and increase the risk of collisions. The application lacks any lighting impact assessment or phototaxis study, meaning it does not adequately consider how aviation lighting may affect these species or contribute to increased mortality rates.

The reliance on daytime survey data in the ornithological assessment further exacerbates this issue, as it fails to account for nocturnal activity or associated hazards. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been taken into account. The absence of site-specific data for night-time creates a crucial gap in understanding the ecological impacts involved.

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

From a policy standpoint, this omission is at odds with National Planning Framework 4 concerning the protection of natural spaces and the maintenance of environmental quality. Additionally, it undermines the comprehensive evaluation of landscape and seascape impacts, as the night-time character is an essential component of the environment.

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

TOURISM

The 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 of sustainable development, as assessed against statutory duties, national policy, and evidential standards. It mirrors the core issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This current application, despite being presented under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, does not provide a complete or reliable evidential basis for determination.

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

Procedural failures are also evident. The lack of a compliant Island Communities Impact Assessment breaches the statutory duty under the Islands (Scotland) Act 2018, while the failure to disclose the full Social Impact Assessment is a material omission.

These shortcomings impede the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

In addition, the proposal is in direct conflict with National Planning Framework 4. It does not demonstrate protection for biodiversity, natural places, and cultural heritage. Moreover, it fails to establish that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, particularly due to the absence of tourism impact modelling. The cumulative impact of both offshore and onshore elements has not been adequately assessed, obscuring effects on peatlands, carbon balance, habitats, and crofting land.

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

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

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

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

Additional Comments

Please don't destroy Scotland's natural beauty with this nonsense.

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: 0D2D226D

Member of the public 1397

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The development 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 have been raised regarding the scale, proximity, and design of the proposal, which challenge its compatibility with statutory requirements, national policy, and the principles of sustainable development.

A thorough examination of the Environmental Impact Assessment Report and associated documentation reveals significant deficiencies that hinder a lawful determination. There is a notable absence of critical environmental data, limited and inconsistent baseline information, and key aspects of the proposal that remain undefined. The flexible design framework employed prevents a clear understanding of the likely significant effects, while the reliance on unspecified mitigation measures renders their effectiveness impossible to assess. Consequently, the information provided does not enable a comprehensive understanding of environmental, cultural, or community impacts, leaving claims of negligible or non-significant effects unsupported by robust evidence.

The proposal demonstrates clear and substantive conflicts with established policy frameworks. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It fails to show that national requirements for protecting biodiversity, climate interests, and environmental integrity can be satisfied. These conflicts directly undermine the statutory tests necessary for consent and impede the competent authority's ability to determine the development's acceptability in policy terms.

The unprecedented scale of the proposal presents significant concerns regarding landscape capacity, visual dominance, and environmental impact, with large turbines positioned alarmingly close 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 cannot support a lawful determination. Given these circumstances, it is essential that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is lacking and does not give a complete, clear, or trustworthy overview of the potential environmental effects of the proposal.

The flexible Project Design Envelope used does not commit to specific turbine dimensions, layouts, or configurations. This creates significant uncertainty and hinders the ability to consistently apply a worst-case scenario. As a result, the assessment's integrity is compromised, meaning that the impacts described may not accurately reflect the final development. This prevents both the public and the competent authority from fully understanding the environmental effects.

The application relies on mitigation measures, monitoring strategies, and management plans that have not been defined yet. Seeking consent under these conditions means that any environmental harm will supposedly be addressed later, which undermines a proper evaluation of effectiveness and assessment of residual impacts. This postponement of essential information until after consent is granted is procedurally unacceptable and contradicts the purpose of the Environmental Impact Assessment regime. This regime requires that significant effects and mitigation measures are clearly identified before a decision is made.

There are also major evidential gaps, including insufficient baseline data, methodological limitations, and reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are made without adequate supporting data. The lack of sufficient information means that cumulative and worst-case impacts are not clearly understood, resulting in scientific uncertainty that does not meet statutory requirements.

Consequently, the application does not meet the evidential threshold necessary under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This raises concerns regarding the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not show compliance with National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity. It has not been demonstrated that the impacts have been fully assessed or that appropriate safeguards are in place.

Overall, the reliance on an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data make the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings prevent a lawful and thorough evaluation of environmental effects, meaning the competent authority cannot make an informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application proposes a project but fails to provide a proper assessment of alternatives, which does not meet the requirements set by the Environmental Impact Assessment regime. It does not offer a structured comparison of realistic alternatives based on their environmental effects. Instead, it presents a narrative of how the project has evolved. This approach does not show that less harmful options have been adequately identified, assessed, and chosen over more damaging solutions.

There is a lack of transparent comparison regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not prove that the developer has truly considered placing turbines further offshore, where the potential for visual, ecological, and coastal impacts would likely be lessened. Considering the sensitivity of the West Lewis coastline and the critical role of proximity to shore in impact assessment, the absence of such analysis prevents any determination that the proposed siting is the least damaging choice.

The shortcomings also apply to the assessment of cable routing and landfall, revealing inadequate evidence that alternative routes have been properly investigated to avoid or reduce impacts on sensitive areas, including those of cultural and spiritual significance like Barvas Cemetery. The lack of a clear strategy for avoidance and the absence of comparative analysis suggest that mitigation through design has not been applied. Instead, there seems to be an over-reliance on mitigation measures that occur after the design phase.

Consequently, the application does not demonstrate that environmental harm has been minimised through careful selection of the site, layout, and routing of infrastructure. This indicates a failure to adhere to the established mitigation hierarchy and hinders the competent authority's ability to assess whether less harmful and more suitable alternatives exist. Without a thorough assessment of alternatives, it cannot be determined that the proposal is a sustainable or compliant solution with relevant policies.

From a policy standpoint, this lack of assessment undermines compliance with National Planning Framework 4, especially regarding the protection of natural areas, cultural heritage, and the wellbeing of communities. The failure to provide a structured and comparative assessment is a significant omission that contributes to the conclusion that the application has not been adequately evaluated, thereby failing to support a lawful decision.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is inadequate, failing to provide a full and dependable understanding of ecological receptors in the West Lewis coastal environment. This area is a biologically active marine system, yet the baseline data is incomplete. The methodologies used do not sufficiently capture species presence, behaviour, and habitat use, leading to a lack of sound evidence for evaluating impacts.

One significant gap involves otters, which are a European Protected Species. The application does not properly recognise or assess their active use of coastal areas for foraging and movement. Consequently, the assessment does not consider their core foraging range or behavioural patterns. This oversight means that the potential effects of construction disturbance, noise, and increased activity have not been properly evaluated, undermining claims regarding the absence of significant effects on this species.

In addition, the assessment of basking sharks shows further deficiencies. The reliance on aerial surveys creates significant detection bias, especially in Atlantic conditions. This method is likely to underestimate their presence, particularly compared to established land-based observations that indicate these waters are frequently used. Not incorporating or properly considering such data contributes to an incomplete baseline and diminishes the reliability of the conclusions.

These methodological shortcomings result in conclusions of negligible or non-significant effects being based on assumptions rather than solid evidence. The lack of adequate baseline data also hinders meaningful assessment of cumulative and indirect impacts, including seasonal variation and wider ecosystem interactions. This uncertainty casts doubt on the actual 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. Protected species have not been correctly identified or assessed. The uncertainty introduced means that adverse effects cannot be excluded beyond reasonable scientific doubt, thus necessitating the application of the precautionary principle. Under these circumstances, granting consent would not be lawful.

Ultimately, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions makes the assessment unreliable. These issues obstruct a thorough evaluation of impacts on marine ecology and protected species, contributing to the overall finding that the application lacks a robust evidential foundation.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency regarding the Social Impact Assessment conducted by the developer is a critical shortcoming that affects the evaluation of the application. While the developer engaged local residents through focus groups, the full report remains unpublished, leading to a significant evidential gap. This absence hinders both public understanding and the competent authority's ability to assess the social risks identified in the developer’s own research.

Evidence suggests that residents are experiencing measurable levels of stress, anxiety, and concern linked to the scale and proximity of the proposed development. These findings are based on direct engagement and should not be viewed as speculative. However, without access to the complete assessment, the findings cannot be adequately scrutinised, and their significance in the decision-making process is diminished.

Furthermore, the proposal is perceived as a threat to community identity and cohesion, with the developer's findings highlighting concerns over “cultural loss.” These social impacts have not been sufficiently acknowledged in the main application and have not been assigned the appropriate weight. The failure to disclose the full Social Impact Assessment obscures the true human and social costs of the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health impacts is crucial for developments of this magnitude, particularly when community character and functioning are at stake. The absence of the complete dataset leads to an incomplete evidential basis for balancing benefits against harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. It is required that developments promote positive health outcomes and avoid causing harm. However, the evidence currently available points to existing adverse effects that have not been fully disclosed. Thus, without the full assessment, compliance with this policy remains unproven.

The procedural implications of this situation are profound. The competent authority cannot perform a thorough socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This represents a material omission within the application and signifies a failure to meet the evidential standards mandated by the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development involves the introduction of large-scale turbines along the West Lewis coastline, which is characterised by its open Atlantic horizon, undeveloped nature, and profound sense of remoteness. This change would create a continuous industrial presence in close proximity to the shoreline, fundamentally transforming the landscape and leading to a permanent and irreversible alteration of its character.

The application does not sufficiently convey the extent of the anticipated visual change. The scale and location of the turbines would dominate the views from residential areas, historic sites, and popular coastal spots, directly impacting visual amenity and diminishing the qualities of naturalness and remoteness that define the area. The current assessment fails to adequately communicate the significance of this impact in light of the sensitivity of the landscape.

Concerns arise regarding the methodology used to select and present visual viewpoints. Evidence indicates that these viewpoints may not accurately reflect the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. Such a shortcoming risks underestimating the magnitude of visual impact, which casts doubt on the credibility of the assessment.

Moreover, the assessment neglects to evaluate the interconnectedness of landscape,

seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are situated within a broader landscape context, interconnected through visual and spatial relationships with the Atlantic horizon. The treatment of these heritage assets as isolated entities overlooks their interdependence, leading to an incomplete understanding of the impacts on their settings and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are perceived and diminishing their connection to the natural horizon. This not only constitutes a visual concern but also inflicts broader cultural and spatial harm that remains inadequately addressed in the application.

From a policy standpoint, the proposal is at odds with National Planning Framework 4 regarding the safeguarding of natural spaces and historic assets. The proposed scale of change is incompatible with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further detracts from any assertions of policy compliance.

Additionally, it is evident that the identified impacts are unlikely to be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelming and inescapable. The resulting alterations to the landscape are fundamental and permanent, rather than amenable to reduction through mitigation measures.

In summary, the assessment does not accurately portray the extent of the impact, the environmental sensitivity, or the interconnectedness of the landscape and heritage. These shortcomings preclude a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal fails to demonstrate compliance with essential policy requirements concerning environmental protection and water quality. A crucial aspect of the application is the incomplete assessment of construction and pollution risks, which does not provide the necessary detail to evaluate the likely environmental effects. Given the substantial seabed preparation and installation works planned in a high-energy Atlantic environment, the absence of fully developed Construction Environmental Management Plans or Pollution Prevention Plans is a significant oversight. Instead, the application relies on mitigation and contingency measures that are to be prepared after consent, hindering any meaningful assessment of their adequacy or effectiveness.

This deferral of key environmental safeguards raises serious concerns, particularly in relation to the sensitive receiving environment of the West Lewis coastline. The area supports clean coastal waters and critical habitats that are vulnerable to disturbances from sediment and contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it lacks detailed strategies

for preventing, controlling, or monitoring these threats.

Furthermore, there remains 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 becomes impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also extends to potential effects on marine species and habitats identified as sensitive within the wider assessment.

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning to a post-consent phase, the application obstructs the evaluation of whether adequate safeguards are in place to address pollution events. This introduces procedural risk and diminishes the competent authority's ability to assess the effectiveness of environmental protection measures at the time of determination.

Collectively, the lack of defined mitigation measures, inadequate management plans, and uncertainty surrounding potential impacts render the assessment materially deficient. These shortcomings significantly hinder a thorough evaluation of construction and pollution risks and further underline the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry. Unfortunately, the application does not adequately demonstrate how these essential uses and habitats will be safeguarded against significant disruption. The assessment of fisheries and marine life is lacking, failing to provide a thorough evaluation of the ecological or socio-economic impacts.

One major concern is the assumption that fishing activities can be displaced without any repercussions. The application does not present evidence that there are alternative fishing grounds that are accessible or capable of bearing the additional pressure. This critical omission raises serious questions, as such displacement could lead to overfishing in other areas, which may have broader economic ramifications for the local fishing fleet. Without a detailed and evidence-based examination, the potential impacts on fisheries and local livelihoods remain obscured.

Moreover, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated by construction activities. The prolonged use of high-energy hammer piling is likely to disturb marine life over significant distances, affecting species including dolphins. The anticipated disturbance to a substantial portion of the local bottlenose dolphin population is alarming, yet the application downplays the seriousness of these effects, lacking sufficient supporting evidence.

There is also a glaring inconsistency in the application regarding the need for licences to permit harm to European Protected Species, which is acknowledged, while

simultaneously classifying impacts as negligible. This contradiction undermines the credibility of the assessment and raises concerns about compliance with the Habitats Regulations, particularly when harm is expected to occur at levels that warrant legal authorisation.

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

From a policy standpoint, the application fails to demonstrate alignment with the National Planning Framework 4 or the National Marine Plan. It does not illustrate that the development can coexist with existing marine users or that it will avoid unacceptable impacts on marine biodiversity, making it difficult to conclude that the proposal represents sustainable development.

The deficiencies in the assessment, particularly concerning fishing displacement, underestimation of acoustic impacts, and internal inconsistencies, render it incomplete and unreliable. These shortcomings impede a robust evaluation of the impacts on marine life and fisheries.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment contains a significant gap, as it fails to address the crucial aspects of dark skies and nocturnal wildlife. The West Lewis coastline, known for its exceptionally dark skies, is vital for environmental quality, cultural identity, and tourism. The proposal introduces permanent red aviation lighting that would create a persistent and disruptive “wall of light” across the western horizon, fundamentally altering the night-time environment.

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

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

The reliance on daytime survey data in the ornithological assessment further compounds this issue, as it does not adequately capture nocturnal activities or associated risks. Other species, such as Kittiwakes, which may forage or migrate during

the night, are equally at risk of disorientation from artificial lighting, yet this has not been assessed. Without site-specific night-time data, the understanding of ecological impacts remains critically deficient.

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

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

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

TOURISM

The proposed development brings serious concerns regarding its impacts on tourism, a vital component of the Isle of Lewis economy. With tourism being fundamentally reliant on the area's wild coastline, near-pristine landscape, dark skies, and the overall sense of remoteness, any industrialisation of the seascape may jeopardise this crucial sector. Although the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide any quantified analysis regarding how large-scale offshore infrastructure would influence visitor numbers, behaviour, or the economic contribution of tourism.

Tourism has seen significant growth, with its value rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. However, the application lacks a model that considers how potential degradation of environmental quality may impact Tourism Gross Value Added and the broader economic resilience of the community. Without this essential analysis, it remains unclear if the development would create a net economic benefit or threaten an established and flourishing sector.

Furthermore, the assessment neglects the critical role of environmental quality in sustaining tourism, such as the need for unspoiled landscapes and dark skies, which enhance the visitor experience and cater to emerging markets like nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment further exacerbates this issue, leaving a substantial void in understanding how the proposal could affect this recognised and growing segment of the local economy.

In a context where economic diversification is limited for this island community, the

lack of a thorough assessment of tourism impacts raises significant concerns regarding employment, local businesses, and community sustainability. The failure to conduct 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 National Planning Framework 4, particularly regarding economic impact and the obligation to prove net benefit. Additionally, it contradicts strategic objectives that prioritise tourism as a growth sector and fails to provide adequate evidence for competent authorities to evaluate the economic implications of the proposal.

Collectively, the inadequacies in quantifying tourism impacts, assessing environmental factors influencing visitor behaviour, and recognising the island's economic dependencies result in a significant evidential gap. This deficiency obstructs a thorough evaluation of the economic effects and reinforces the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm 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.

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: 89D20F99

Member of the public 1398

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under relevant marine licensing and Environmental Impact Assessment frameworks. Upon reviewing the Environmental Impact Assessment Report and accompanying documentation, it is evident that there are significant deficiencies across various dimensions, including planning, environmental, cultural, and procedural aspects. The project is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. The scale and design of the proposed development, particularly its proximity to the shoreline, raise essential questions about its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks an adequate evidential foundation for a lawful decision. There are notable omissions of critical environmental data, limited and inconsistent baseline information, and several key elements of the proposal remain undefined. The use of a flexible design framework hinders a clear assessment of likely significant effects, while the reliance on unspecified mitigation measures makes it impossible to evaluate their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the impacts on the environment, culture, and community, and assertions of negligible or non-significant effects are not substantiated by credible evidence.

Furthermore, there are clear and significant conflicts with established policies. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and public health and wellbeing. It does not adequately demonstrate compliance with national obligations to protect biodiversity, climate interests, and environmental integrity. Such conflicts are pivotal to the statutory tests necessary for consent and hinder the ability of the competent authority to determine the development's acceptability in terms of policy.

The unprecedented scale of this proposal in this location, combined with the placement of large turbines in close proximity to the shoreline, raises serious concerns regarding landscape capacity, visual impact, and environmental consequences. Taken collectively, the absence of sufficient information, dependence on undefined mitigation strategies, evidential shortcomings, and clear non-compliance with policy reflect that the application is incomplete and insufficient for lawful consideration. In light of these factors, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and does not deliver a full, transparent, or dependable account of the potential environmental effects associated with the proposal. The flexible Project Design Envelope employed in the application, which does not commit to specific turbine dimensions, layouts, or configurations, creates substantial uncertainty. This uncertainty obstructs the consistent application of a worst-case scenario, thereby undermining the integrity of the assessment. Consequently, the impacts outlined may not accurately represent the development that will ultimately be constructed, hindering both public understanding and that of the competent authority regarding the true extent of the environmental effects.

Furthermore, the application is predominantly dependent on mitigation measures, monitoring strategies, and management plans that are not yet defined. Seeking consent on the premise that environmental harm will be addressed at a later stage obstructs any substantial evaluation of the effectiveness of these measures or assessment of residual impacts. This postponement of crucial information to post-consent stages is procedurally unacceptable, contradicting the intent of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be clearly established before determination.

Additionally, there are significant evidential gaps, including deficiencies in baseline data, limitations in methodology, and a reliance on assumptions rather than site-specific evidence. This results in uncertainty regarding the magnitude and significance of impacts, especially in cases where negligible or non-significant effects are presented without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, leading to scientific uncertainty that cannot be aligned with statutory requirements.

As a result, the application does not meet the evidential threshold stipulated under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning 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 remains unclear whether impacts have been thoroughly assessed or appropriate safeguards implemented.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development introduces large-scale turbines near the West Lewis coastline, which is characterised by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. This project threatens to create a continuous industrial

presence that would fundamentally alter the landscape, leading to a permanent transformation that could not be reversed. The assessment of potential seascape, landscape, and visual impacts is critically deficient, failing to adequately convey the extent of this visual change and the sensitivity of the environment.

The scale and proximity of the turbines would dominate the views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and eroding the key qualities of naturalness and remoteness. This deficiency extends to the methodologies used in selecting and presenting visual viewpoints, which may not capture the most sensitive receptors or worst-case scenarios, particularly concerning significant cultural heritage sites. As a result, the assessment may have understated the visual impact, calling into question the reliability of its findings.

Furthermore, the application overlooks 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 that is visually and spatially linked to the Atlantic horizon. The assessment inadequately treats these sites as isolated rather than recognising their interdependence, which leads to an incomplete evaluation of the impact 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 change represents not just a visual impact, but also a broader cultural and spatial harm that has not been sufficiently evaluated in the application. From a policy standpoint, the proposal is at odds with National Planning Framework 4, which aims to protect natural places and historic assets. The scope of change proposed is incompatible with the need to safeguard landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertion of compliance with policy.

Moreover, 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. This change is substantial and permanent, incapable of being reduced to an acceptable level through mitigation efforts. Collectively, the assessment fails to accurately reflect the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage, resulting in an unreliable evaluation that reinforces the conclusion that the proposal is not compatible with the protection of this significant landscape.

FISHERIES AND MARINE LIFE

The application presents a concerning lack of evidence regarding the potential displacement of fishing activity. It assumes that such displacement can occur without negative consequences, yet it fails to establish whether alternative fishing grounds are available, accessible, or capable of accommodating the increased pressure. This oversight is critical, as the risk of overfishing in other areas poses a threat not only to marine life but also to the economic stability of the local fishing fleet. The implications

for fisheries and livelihoods remain inadequately addressed, leaving serious questions about the long-term sustainability of these practices.

Moreover, the risks posed to marine species, particularly from underwater noise during construction, are alarmingly understated. The use of high-energy hammer piling is anticipated to generate disturbances over considerable distances, which may adversely affect species such as dolphins. The anticipated impact on a significant portion of the local bottlenose dolphin population raises profound concerns, yet the application minimizes these effects without providing compelling supporting evidence.

There is a notable inconsistency within the application itself, where it acknowledges the need for licences to permit harm to European Protected Species, while simultaneously asserting that the impacts are negligible. This contradiction not only undermines the credibility of the assessment but also raises significant doubts about compliance with the Habitats Regulations, particularly in scenarios where anticipated harm would necessitate legal authorisation.

Additionally, the assessment does not adequately address the cumulative impacts arising from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these interconnected effects, it is impossible to gauge the overall impact on marine ecosystems and socio-economic conditions effectively.

From a policy standpoint, the application fails to demonstrate alignment with the National Planning Framework 4 or the National Marine Plan. It does not provide sufficient evidence that the development can coexist harmoniously with current marine users or that it can avert unacceptable impacts on marine biodiversity, which are essential for concluding that the proposal aligns with the principles of sustainable development.

In summary, the glaring deficiencies regarding fishing displacement, the minimisation of acoustic impacts, and the internal contradictions within the application render the assessment both incomplete and unreliable. These issues critically hinder any reliable evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the project as a whole is fundamentally flawed, as it fails to provide a complete evaluation of the impacts associated with what constitutes a single integrated endeavour. The distinct treatment of offshore turbines and onshore works results in a fragmented analysis that obscures the true scope of the environmental and socio-economic consequences.

The onshore infrastructure comprises various elements, including cabling across protected moorland, the construction of a substation in proximity to Stornoway, and the development of access routes through delicate landscapes. Notably, these activities involve excavation in areas of deep peat, especially within Barvas Moor, which

is recognised as both an ecologically sensitive habitat and a critical carbon store. The application does not offer a thorough assessment of these impacts, thereby hindering a comprehensive understanding of the project's overall environmental footprint.

Furthermore, the separation of assessments for offshore and onshore components leads to a failure to evaluate cumulative effects adequately. The Environmental Impact Assessment process mandates that all parts of a project be examined collectively. However, the disjointed assessment obscures the combined effects on peatlands, habitats, and local communities, leaving significant risks unaddressed.

There are substantial threats to sensitive habitats, including machair systems and peatland environments, which hold policy protection. The application lacks sufficient evidence that impacts on these habitats have been fully evaluated or that effective avoidance measures have been implemented, which raises a clear evidential gap in terms of biodiversity protection.

Concerns are also raised regarding the project's carbon balance. Disturbance of peatland areas can release stored carbon, leading to a potential carbon debt that contradicts the aims of renewable energy initiatives. The application fails to tackle this issue adequately or to demonstrate that the overall carbon balance remains advantageous.

Moreover, the routing of the infrastructure through active croft land introduces risks of conflict with existing land uses and legal entitlements. There is no evidence provided that the necessary consents or processes have been initiated, which raises concerns about the project's deliverability and lawful execution.

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

In summary, the separation of the project's components, the lack of a comprehensive impact assessment, and insufficient evidence concerning environmental and land use implications collectively render this aspect of the application incomplete and unreliable, thus obstructing a lawful determination.

TOURISM

The tourism sector on the Isle of Lewis has seen substantial growth, rising from £65 million in 2017 to over £81.5 million, which now supports more than 1,000 jobs and accounts for up to 16% of the island's economy. However, the assessment of the application inadequately addresses the potential economic and social impacts on this critical sector. Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. While the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide a quantified assessment of how large-scale offshore infrastructure might influence visitor

numbers, behaviours, or the overall economic contribution of tourism.

Moreover, the assessment neglects to evaluate how the industrialisation of the seascape and a loss of environmental quality could affect the Tourism Gross Value Added and broader economic resilience. Without this analysis, it is impossible to ascertain whether the proposed development would generate a net economic benefit or hinder a sector that is already established and growing.

The role of environmental quality in supporting tourism is also overlooked, particularly concerning the significance of unspoiled landscapes and dark skies for visitor experiences, which are crucial for emerging markets like nature-based tourism and astro-tourism. The omission of a Dark Skies Assessment further highlights this deficiency, creating a major gap in understanding the impacts on an increasingly recognised aspect of the local economy.

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

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

Taken collectively, the absence of a detailed quantification of tourism impacts, the lack of consideration for environmental factors influencing visitor behaviour, and the oversight of the island's economic dependency lead to a significant evidential gap. This gap inhibits a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the essential criteria for sustainable development as required by statutory duties, national policy, and evidential standards. It mirrors the fundamental concerns that led to the rejection of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. This current application, while submitted under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, still does not adequately address these issues.

There are significant shortcomings in the evidential basis for the application. Critical gaps in baseline data exist, alongside the continued use of an undefined design envelope and reliance on unspecified mitigation measures. Additionally, there are omissions concerning key impact pathways, including effects on nocturnal wildlife, the

complete onshore infrastructure, and potential tourism implications. As a result, the Environmental Impact Assessment remains incomplete, hindering a comprehensive understanding of likely significant effects or any residual impacts.

The application also presents clear procedural failures. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the non-disclosure of the full Social Impact Assessment represents a material omission. These deficiencies obstruct the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application inappropriate for determination.

This proposal contradicts the directives of National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural places, or cultural heritage, nor does it establish that health and wellbeing impacts are acceptable. Furthermore, the absence of tourism impact modelling means that a net economic benefit cannot be evidenced. The cumulative effects of both offshore and onshore components have not been thoroughly assessed, obscuring their impact on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the project remain uncertain and potentially significant. Assessments pertaining to marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The required evidential threshold to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, thus engaging the precautionary principle and barring a lawful conclusion regarding acceptable impacts.

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

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

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

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: AACE99E0

Member of the public 1399

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the proposed Spiorad na Mara Offshore Wind Farm, which has been submitted under the marine licensing and Environmental Impact Assessment regimes. The objection stems from an analysis of the Environmental Impact Assessment Report and its supporting documents, highlighting significant deficiencies across planning, environmental, cultural, and procedural aspects. This development 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 heritage. Concerns arise from the scale, proximity, and design of the project, which challenge its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential foundation for a lawful determination. There is a notable absence of critical environmental data, while baseline information is both limited and inconsistent. Additionally, key components of the proposal remain undefined. The flexible design framework employed prevents a comprehensive understanding of potential significant effects, and the reliance on unspecified mitigation measures means their effectiveness cannot be evaluated. Consequently, the documentation does not allow for a thorough understanding of the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by adequate evidence.

There are evident and substantial conflicts with policy. The proposal does not appear to comply with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, especially regarding biodiversity, natural environments, cultural heritage, and health and wellbeing. It fails to establish that national obligations for the protection of biodiversity, climate interests, and environmental integrity can be fulfilled. These conflicts are directly relevant to the statutory tests required for consent and compromise the competent authority's ability to determine that the development is acceptable from a policy perspective.

The unprecedented scale of the proposal in this area, 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 adequate information, dependence on undefined mitigation, evidential shortcomings, and clear policy violations indicate that the application is incomplete and unable to support a lawful determination. In light of these issues, the precautionary principle must be applied.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is significantly lacking, leading to an unreliable understanding of ecological receptors in this sensitive and biologically active marine system. The methodologies employed have proven inadequate in capturing essential aspects such as species presence, behaviour, and habitat use, resulting in incomplete baseline data. Consequently, this deficiency undermines the evidential basis necessary for evaluating potential impacts.

A notable gap exists concerning otters, recognised as a European Protected Species. The application does not appropriately acknowledge or assess their active utilisation of coastal regions for foraging and movement. The oversight of their core foraging range and behavioural patterns leaves the potential impacts of construction disturbances, noise, and increased activity insufficiently evaluated, thereby challenging any conclusions regarding the absence of significant effects on this species.

The assessment of basking sharks is similarly flawed, as it relies on aerial surveys that introduce considerable detection bias, particularly under Atlantic conditions. This reliance risks underestimating their presence when compared to well-established land-based observations that indicate frequent utilisation of these waters. The failure to adequately consider such data contributes to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings result in conclusions about negligible or non-significant effects being based on assumptions rather than robust evidence. The lack of sufficient baseline data hampers the ability to conduct a meaningful assessment of cumulative and indirect impacts, as well as seasonal variation and broader ecosystem interactions. This uncertainty obscures the true scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements outlined in the Environmental Impact Assessment regime and National Planning Framework 4, as there has been an inadequate identification and assessment of protected species. The uncertainty introduced by these deficiencies inhibits the possibility of excluding adverse effects beyond reasonable scientific doubt, necessitating the precautionary principle. In such circumstances, granting consent would not be legally permissible.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions collectively 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 lacks a sufficiently robust evidential foundation.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The full Social Impact Assessment has not been published, leading to a significant evidential gap that hampers both public understanding and the competent authority's ability to evaluate the associated social risks comprehensively. Although the developer

has undertaken a Social Impact Assessment that included focus groups with local residents, the non-disclosure of the complete report raises concerns regarding transparency and thoroughness in the evaluation process. Summaries reveal that residents are facing measurable stress, anxiety, and concern due to the proximity and scale of the proposed development, underscoring the need for a detailed examination of these impacts, which are based on direct engagement rather than speculation.

Moreover, the proposal is viewed as a threat to community identity and cohesion, with the developer acknowledging potential “cultural loss” in their findings. However, these significant impacts have not been adequately incorporated into the main application or weighted appropriately. The withholding of the full assessment obscures the true social and human costs associated with the development, thereby undermining the overall Environmental Impact Assessment process.

A comprehensive understanding of social, economic, and health impacts is imperative for developments of this magnitude, particularly when community character is at stake. The failure to disclose the complete dataset inhibits a balanced assessment of benefits and harm, rendering the application deficient. From a policy standpoint, the application does not align with National Planning Framework 4 regarding health and wellbeing, which necessitates that development fosters positive health outcomes and mitigates harm. Existing evidence indicates adverse effects that have not been fully disclosed, further complicating compliance with this policy.

The procedural ramifications of this situation are substantial. Without the complete Social Impact Assessment, the competent authority cannot conduct a thorough socio-economic and health evaluation, constituting a material omission within the application. This failure to meet the evidential requirements of the Environmental Impact Assessment framework is critical. Collectively, the non-disclosure of the full assessment, alongside evidence of existing adverse impacts, results in an incomplete and unreliable evaluation, obstructing a lawful determination and reinforcing the assertion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, seascape, and landscape is fundamentally inadequate and does not accurately capture the extent of the changes or the sensitivity of the environment that would be affected. The character of the West Lewis coastline is distinguished by an unspoiled Atlantic horizon, an undeveloped landscape, and a pronounced sense of remoteness. The introduction of large-scale turbines near the shore would lead to a continuous industrial presence, which would irrevocably transform this character.

Inadequacies in the application extend to its representation of the scale of visual change. The size and placement of the turbines would overshadow views from residential neighbourhoods, historic sites, and popular coastal areas. This would have a direct adverse effect on visual amenity and undermine the intrinsic qualities of naturalness and remoteness. The assessment fails to convey the full significance of

this impact in light of the sensitivity of the landscape.

Concerns also arise regarding the methodology used for selecting and presenting visual viewpoints. There is evidence indicating that the viewpoints chosen may not adequately reflect the most sensitive receptors or the worst-case scenarios, particularly with respect to important cultural heritage locations and high-value landscapes. Such shortcomings raise the risk that the actual visual impacts have been understated, which compromises the overall reliability of the assessment.

Another notable deficiency is the lack of evaluation of the interconnectedness between seascape, landscape, and cultural heritage. Notable sites, including 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 heritage assets as isolated entities instead of acknowledging their interdependence, leading to an incomplete understanding of the impacts on their context and cultural significance.

The industrialisation of the seascape would disrupt these vital relationships, altering the context in which heritage assets are perceived and breaking their link to the natural horizon. This constitutes not only a visual impact but also a more extensive cultural and spatial detriment that the application does not sufficiently assess.

From a policy standpoint, the proposal is directly at odds with National Planning Framework 4 regarding the safeguarding of natural places and historic assets. The extent of the changes proposed is incompatible with the imperative to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case impact assessment further weakens any assertions of compliance with policy requirements.

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. Consequently, the resulting change is inherent and permanent, not something that can be reduced to an acceptable level through mitigation efforts.

Overall, the assessment does not accurately depict the scale of the impact, the sensitivity of the environment, or the interconnectedness of landscape and heritage. These shortcomings preclude a dependable evaluation and substantiate the conclusion that the proposal is incompatible with the conservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal involves significant seabed preparation and installation works in a high-energy Atlantic environment, but the assessment of construction and pollution risks is lacking in detail needed for a thorough evaluation of likely environmental effects. There are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included with the application, which instead relies on the preparation of mitigation and contingency measures after consent. This reliance on undefined

future actions raises serious concerns, particularly considering the sensitivity of the West Lewis coastline, which is home to clean coastal waters and vulnerable habitats at risk of sediment disturbance and contamination.

The application does acknowledge certain risks, such as sediment mobilisation and the potential for accidental chemical or oil spills, yet it fails to provide adequate information on how these risks will be prevented, controlled, or monitored effectively. Additionally, there is uncertainty surrounding the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. Without thorough modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of these disturbances. This uncertainty is compounded by potential effects on already identified sensitive marine species and habitats within the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures, which further exacerbates the concerns regarding environmental protection. By postponing contingency planning to a post-consent stage, the application limits the ability to evaluate whether adequate safeguards are in place to manage pollution events. This introduces procedural risks and diminishes the competent authority's capacity to assess environmental measures before a decision is made.

From a regulatory standpoint, deferring essential environmental safeguards conflicts with the requirements established by the Environmental Impact Assessment regime. Significant effects and mitigation measures must be evaluated prior to consent; if this information is not available, a lawful determination cannot be achieved. The application also does not demonstrate compliance with relevant policy requirements concerning environmental protection and water quality.

Overall, the lack of defined mitigation measures, detailed management plans, and clarity regarding potential impacts result in a materially deficient assessment. These shortcomings hinder a robust evaluation of construction and pollution risks, further substantiating the conclusion that the application remains incomplete.

FISHERIES AND MARINE LIFE

The assessment of marine life and fisheries related to the application is inadequate and lacks a thorough evaluation of both ecological and socio-economic impacts. The coastal waters off West Lewis are home to a vibrant marine ecosystem and an active fishing industry. However, the proposal does not adequately address how these vital uses and habitats will be preserved or sustained without substantial disruption.

A critical concern lies in the flawed assumption that fishing activities can be relocated without significant repercussions. The application fails to provide evidence that alternative fishing grounds exist, are accessible, or can sustain the additional pressure that displacement would entail. This gap in information is crucial, as it poses risks of overfishing in other areas and could have broader economic ramifications for the local

fishing fleet. In the absence of a clear, evidence-based assessment, understanding the implications for fisheries and local livelihoods remains impossible.

Furthermore, the proposal poses considerable risks to marine species, primarily due to the underwater noise produced during construction. The use of high-energy hammer piling over an extended duration is expected to create disturbances across considerable distances, negatively impacting species such as dolphins. The anticipated disturbance to a large portion of the local bottlenose dolphin population is particularly alarming. Yet, the application minimises these potential effects and does not provide adequate evidence to support such downplaying.

There is also a troubling inconsistency within the application, where the necessity for licences to allow harm to European Protected Species is recognised, while simultaneously describing the impacts as negligible. This contradiction calls into question the validity of the assessment and raises issues concerning adherence to the Habitats Regulations, especially when harm is expected to a level that would require legal clearance.

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

From a policy standpoint, the application fails to demonstrate conformity with the National Planning Framework 4 or the National Marine Plan. It does not establish that the development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, thereby obstructing any conclusion that the proposal is sustainable.

In summary, the shortcomings related to evidence on fishing displacement, the minimisation of acoustic impacts, and the inconsistencies within the application render the assessment both incomplete and unreliable. These inadequacies impede a thorough understanding of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application raises serious concerns regarding the routing of infrastructure through active croft land, which introduces 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 questions about the deliverability and lawful implementation of the project.

The assessment of onshore infrastructure is significantly incomplete, failing to recognise the interconnectedness of the offshore turbines and onshore works. This separation results in a fragmented approach that obscures the full scale of environmental and socio-economic impacts. The onshore components include cabling

across protected moorland, the construction of a substation near Stornoway, and associated access infrastructure through sensitive landscapes. Excavation is planned across areas of deep peat, particularly within Barvas Moor, which is both a significant carbon store and an ecologically sensitive habitat. The lack of a comprehensive assessment hinders a full understanding of the overall environmental footprint of the project.

Furthermore, by excluding or deferring the assessment of onshore impacts, the application does not allow for proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all components of a project are considered collectively; however, the distinct treatment of offshore and onshore elements results in an insufficient understanding of the combined impacts on peatlands, habitats, and local communities.

There are also considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are afforded policy protection. The application fails to demonstrate that impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been implemented, highlighting a clear evidential gap in relation to biodiversity protection.

In addition, the proposal raises critical issues concerning carbon balance. Disturbing peatland can release stored carbon, potentially creating a carbon debt that contradicts the objectives of renewable energy development. The application does not sufficiently address this concern or prove that the overall carbon balance remains advantageous.

From a policy standpoint, the failure to assess the project as a whole, along with the inability to demonstrate adequate protection of peatlands, habitats, and land use interests, conflicts with the National Marine Plan and National Planning Framework 4. The lack of evidence to show that impacts can be avoided or mitigated further diminishes the application's reliability.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal fails to include any assessment of nocturnal wildlife, which is critical given that species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly vulnerable to artificial lighting. The impacts of this lighting, specifically its potential to disorient these species and increase the risk of collision, have not been evaluated. Additionally, the ornithological assessment is based solely on daytime survey data, neglecting nocturnal activity and the associated risks. Kittiwakes, which may forage or migrate at night, are also at risk of disorientation due to artificial lighting, yet this has not been considered. The lack of site-specific night-time data creates a significant gap in understanding the ecological impacts.

The introduction of permanent red aviation lighting visible over long distances would create a continuous and intrusive “wall of light” across the western horizon, fundamentally altering the night-time environment of the West Lewis coastline. This area is characterised by exceptionally dark skies, which play a vital role in environmental quality, cultural identity, and tourism value. The application does not address the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. The omission of such assessments is significant, particularly as dark skies are important for the area’s identity and for emerging sectors such as astro-tourism.

This lack of assessment leads to a clear gap in the overall landscape and environmental evaluation. Without understanding the nocturnal impacts, it is impossible to determine if protected species or designated sites may be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt cannot be achieved, which engages the precautionary principle and complicates lawful determination.

Moreover, from a policy standpoint, the absence of this assessment conflicts with National Planning Framework 4, which emphasises the protection of natural places and environmental quality. The oversight also undermines the broader assessment of landscape and seascape impacts since the night-time character is an integral aspect of the environment.

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

TOURISM

The application exhibits considerable deficiencies in its assessment of tourism impacts, crucially neglecting to analyse the economic and social ramifications for a vital sector of the Isle of Lewis's economy. Tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. While the application indicates that 86% of visitors are attracted by scenery, it fails to provide a quantified evaluation of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution.

Tourism on the island has seen notable growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and constitutes up to 16% of the island's economy. However, the application does not model the potential impacts of the industrialisation of the seascape and the resultant loss of environmental quality on Tourism Gross Value Added or the broader economic resilience. This lack of analysis obscures the ability to ascertain whether the proposed development would generate a net economic benefit or threaten an established and burgeoning sector.

Moreover, the assessment neglects the critical role of environmental quality in underpinning tourism, particularly the significance of unspoiled landscapes and dark skies to the visitor experience and to emerging markets such as nature-based tourism and astro-tourism. The omission of a Dark Skies Assessment exacerbates this shortcoming, leaving a considerable gap in understanding the potential impacts on an acknowledged and expanding segment of the local economy.

Given that the community on the island has limited economic diversification, the failure to assess tourism impacts raises broader concerns regarding employment, local businesses, and the sustainability of the community. The lack of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been scrutinised as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly regarding economic impacts and the necessity to illustrate net benefit. It also conflicts with strategic objectives that prioritise tourism as a growth sector, and it lacks adequate evidence for the competent authority to evaluate the economic repercussions of the proposal.

In summary, the inadequacies in quantifying tourism impacts, assessing the environmental factors that drive visitor behaviour, and considering the island's economic reliance culminate in a substantial evidential gap. This hinders a thorough evaluation of economic effects and contributes to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the criteria for sustainable development as required by statutory duties, national policy, and evidential standards. This application echoes the fundamental issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. Despite the introduction of a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the current proposal fails to adequately address these concerns.

A reliable evidential basis for determination is not provided in the application. There are notable deficiencies in baseline data, reliance on an ill-defined design envelope, unspecified mitigation measures, and key impact pathways such as nocturnal wildlife, full onshore infrastructure, and tourism effects are omitted. Consequently, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of the likely significant effects or residual impacts.

There are procedural failures present in the application. The lack of a compliant Island Communities Impact Assessment is a violation of the statutory duty outlined in the Islands (Scotland) Act 2018, while the failure to present a full Social Impact Assessment represents a significant omission. These shortcomings impede the

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

The proposal contradicts the principles of National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural places, and cultural heritage, fails to ensure that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit as a result of missing tourism impact modelling. The cumulative effects of both offshore and onshore components have not been thoroughly assessed, obscuring the potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. The assessments relating to 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, which activates the precautionary principle, thus preventing any lawful determination that impacts are acceptable.

The proposal also threatens to bring about substantial and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption to cultural and visual relationships, and impacts on tourism are all permanent effects that cannot be mitigated to an acceptable level.

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

In conclusion, 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: 01E3BA6B

Member of the public 1400

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 procedures. A thorough review of the Environmental Impact Assessment Report and accompanying materials reveals significant deficiencies in planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west coast of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. Concerns arise regarding the compatibility of the project's scale, proximity, and design with statutory requirements, national policy, and sustainable development principles.

The application lacks a robust evidential basis necessary for a lawful determination. Essential environmental data is missing, baseline information is either limited or inconsistent, and crucial components of the proposal remain undefined. The adoption of a flexible design framework complicates the assessment of likely significant effects, and the reliance on unspecified mitigation measures hampers the evaluation of their potential effectiveness. Consequently, the documentation fails to provide a comprehensive or informed perspective on the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by credible evidence.

There are evident and substantial conflicts with existing policies. The proposal is at odds with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health and wellbeing. It does not adequately demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts are critical as they directly pertain to the statutory tests required for consent and challenge the ability of the competent authority to ascertain the development's acceptability from a policy standpoint.

The scale of this proposal is unprecedented for the area, with large turbines sited in close proximity to the shoreline, raising significant concerns about landscape capacity, visual impact, and environmental consequences. Collectively, the lack of sufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy violations highlight that the application is incomplete and unable to facilitate a lawful determination. In light of these factors, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate, failing to deliver a complete, transparent, or trustworthy overview of the likely environmental repercussions of the proposal. The flexible Project Design Envelope, which lacks specific turbine dimensions, layouts, or configurations, creates substantial uncertainty and hinders the application of a worst-case scenario. This compromises the assessment's integrity, meaning the impacts outlined may not accurately represent the development that is ultimately built. Consequently, both the public and the competent authority are deprived of a true understanding of the extent of environmental effects.

Furthermore, the application places considerable reliance on mitigation measures, monitoring strategies, and management plans that have yet to be clearly defined. Seeking consent on the premise that environmental harm will be mitigated later obstructs a meaningful evaluation of effectiveness or assessment of residual impacts. Such deferral of critical information to post-consent stages is procedurally unacceptable and contradicts the Environmental Impact Assessment regime's purpose, which necessitates that likely significant effects and mitigation measures be established before determination.

There are substantial evidential deficiencies present, including insufficient baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. This leads to uncertainty regarding the magnitude and significance of impacts, particularly where conclusions of negligible or non-significant effects are reached without strong supporting data. The lack of adequate information inhibits a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot align with statutory requirements.

Consequently, the application does not meet the evidential threshold mandated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. The proposal additionally falls short of demonstrating compliance with National Planning Framework 4, including its stipulations regarding biodiversity protection and environmental integrity, as it cannot be verified that impacts have been comprehensively assessed or that suitable safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The 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 assessment of marine ecology and protected species is fundamentally inadequate, failing to deliver a comprehensive or reliable understanding of ecological receptors within the West Lewis coastal environment. This marine system is both highly sensitive and biologically active, yet the baseline data is lacking, and the methodologies employed do not sufficiently capture the presence, behaviour, and habitat use of various species. Consequently, the assessment does not offer a solid evidential basis for evaluating potential impacts.

A notable shortcoming is the omission of otters, which are a European Protected Species. The application does not adequately recognise or assess their active use of coastal areas for foraging and movement. This oversight in considering their core foraging range and behavioural patterns means that the potential effects of construction disturbance, noise, and increased activity remain insufficiently assessed.

As a result, any conclusions drawn regarding the absence of significant effects on this species are compromised.

Further methodological deficiencies emerge in the assessment of basking sharks. The reliance on aerial surveys introduces a significant detection bias, particularly in the challenging conditions of the Atlantic. This method is likely to underestimate the presence of these sharks, especially when compared to established land-based observations that indicate frequent usage of these waters. The failure to incorporate or properly consider such critical data leads to an incomplete baseline and diminishes the reliability of the conclusions reached.

These methodological shortcomings imply that any conclusions suggesting negligible or non-significant effects are largely based on assumptions rather than robust evidence. Moreover, the absence of adequate baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This results in uncertainty regarding the actual level of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set out by the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainty introduced undermines the ability to exclude adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it is clear that consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents significant flaws in its ornithological assessment, which suffers from major gaps in evidence and contradictions that undermine its validity. Located in crucial foraging areas and migratory pathways on the west coast of the Isle of Lewis, the development poses a threat to internationally important seabird populations, many of which are already in decline. However, the application fails to meet the evidential standards necessary to assure that these species will not face adverse effects.

A troubling inconsistency is evident within the submission, as the developer asserts that there will be no significant adverse effects while concurrently making a case for Habitats Regulations derogation, a process invoked only when significant harm is anticipated. This contradiction raises serious doubts about the reliability of the assessment, suggesting that its conclusions lack robust support from the available evidence.

Furthermore, the assessment inadequately addresses the impact on seabirds associated with protected sites such as the Lewis Peatlands and St Kilda. The critical importance of their feeding grounds is not sufficiently considered, and the reliance on modelling introduces uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars, which are already experiencing severe declines. The methodologies used are likely to underestimate mortality rates due to incomplete baseline data and a lack of comprehensive understanding of the species' behavioural responses.

The placement of turbines within a recognised migratory corridor poses additional risks, creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The assessment does not thoroughly evaluate the long-term consequences of potential sustained mortality in this corridor or the effects on species with already small global populations.

Regulatory standards have not been met, as the application fails to establish, beyond reasonable scientific doubt, that there will be no adverse effect on the integrity of protected sites. The contradictory findings, combined with data gaps and limitations in modelling, engage the precautionary principle, hindering a lawful conclusion in support of consent.

Moreover, the deficiencies highlighted indicate non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to convincingly demonstrate that globally significant seabird populations will remain unaffected brings the proposal into direct conflict with national policy.

In summary, the assessment's internal inconsistencies, methodological shortcomings, and insufficient evidence collectively render it unreliable. These issues prevent a thorough evaluation of the potential impacts and lead to the conclusion that the application does not fulfil the statutory requirements necessary for determination.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's commissioned Social Impact Assessment, which included focus groups with local residents, has not been made fully available. This lack of transparency represents a significant evidential gap that hinders public understanding and prevents the competent authority from evaluating the full extent of social risks identified through the developer’s own research. Available summaries indicate that local residents are experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are grounded in direct engagement and therefore cannot be regarded as speculative. However, the failure to publish the complete assessment stifles proper scrutiny of the findings and limits the ability to ascertain their significance in the decision-making process.

Moreover, there is evidence that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" noted in the developer's own findings. Despite this serious concern, these impacts have not been adequately integrated into

the main 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 absence of transparency undermines the entire Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is essential for developments of this scale, especially when community character and functioning may be compromised. By failing to provide the complete dataset, the application lacks a solid evidential basis for evaluating the balance between benefits and harms.

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

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

In summary, the combination of non-disclosure of the full Social Impact Assessment and evidence of existing negative impacts renders the evaluation incomplete and unreliable. This situation obstructs a lawful determination and reinforces the conclusion that the application does not rest on sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal's assessment of seascape, landscape, and visual impacts is fundamentally lacking and does not adequately capture the scale of change or the sensitivity of the environment. The coastline of West Lewis is characterised by its open Atlantic horizon, undeveloped nature, and a profound sense of remoteness. The placement of large-scale turbines near the shoreline would introduce a continuous industrial presence that would fundamentally alter this character, leading to a permanent and irreversible transformation of the landscape.

Moreover, the application fails to represent the extent of the visual change adequately. The turbines' scale and proximity would dominate the views from residential areas, historic sites, and popular coastal spots. This would have a direct effect on visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not convey the true significance of this impact within such a sensitive landscape context.

There are notable methodological issues regarding the selection and presentation of visual viewpoints. Evidence indicates that the viewpoints chosen may not fully represent the most sensitive receptors or the worst-case scenarios, especially

concerning key cultural heritage sites and high-value landscapes. This raises concerns that the visual impact may have been understated, which weakens the assessment's reliability.

Additionally, the application neglects to assess the interconnectedness between landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape context linked visually and spatially to the Atlantic horizon. The assessment considers these sites in isolation instead of recognising their interdependence, leading to an incomplete understanding of the impacts on their setting and cultural significance.

The introduction of industrialisation into the seascape would disrupt these connections, altering how heritage assets are experienced and their link to the natural horizon. This not only signifies a visual impact but also a wider cultural and spatial detriment that has not been appropriately evaluated within the application.

From a policy standpoint, the proposal contradicts the principles set forth in National Planning Framework 4 regarding the safeguarding of natural places and historical assets. The scale of the proposed change is incompatible with the imperative to protect landscape character, visual amenity, and the context of culturally significant sites. Furthermore, the lack of a thorough worst-case assessment further undermines any assertions of compliance with policy.

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

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

CONSTRUCTION AND POLLUTION RISKS

The application lacks sufficient detail regarding the assessment of construction and pollution risks, rendering it materially deficient. It involves significant seabed preparation and installation activities within a high-energy Atlantic environment, yet does not provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are to be formulated post-consent, which hampers any meaningful evaluation of their adequacy or effectiveness.

This reliance on undefined future measures is particularly troubling in light of the sensitivity of the receiving environment. The West Lewis coastline is known for its clean coastal waters and significant habitats that are at risk from sediment disturbance and contamination. While the application does recognise risks such as sediment

mobilisation and accidental chemical or oil spills, it fails to furnish adequate detail on the methods of prevention, control, or monitoring of these risks.

Moreover, there exists uncertainty surrounding the scale and behaviour of sediment plumes produced by seabed disturbance and cable installation. Without comprehensive modelling and explicitly defined management strategies, the potential extent, duration, and ecological effects of these impacts cannot be determined. This uncertainty extends to potential consequences for marine species and habitats that have already been acknowledged as sensitive within the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent has been granted, the application obstructs the assessment of whether appropriate safeguards are in place to address pollution incidents. This introduces procedural risk and undermines the capability of the competent authority to review environmental protection measures during the determination process.

From a regulatory viewpoint, the postponement of vital environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. Significant effects and mitigation must be evaluated prior to consent, and in the absence of this information, a lawful determination cannot be achieved. The application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

In summary, the lack of defined mitigation measures, inadequate management plans, and the uncertainty regarding potential impacts collectively indicate that the assessment is insufficient. These deficiencies inhibit a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry, yet the application related to this development lacks a thorough assessment of its ecological and socio-economic impacts. A critical flaw is the presumption that fishing activities can be relocated without repercussions. There is no evidence presented that alternative fishing grounds are available, easily accessible, or capable of withstanding additional fishing pressure. This significant gap raises concerns over potential overfishing in other areas, which could adversely affect the local fishing fleet's economic stability. The absence of a clear, evidence-based evaluation makes it impossible to fully understand the implications for fisheries and local livelihoods.

Furthermore, the proposal poses considerable risks to marine species, particularly due to the underwater noise produced during construction activities. The use of high-energy hammer piling for prolonged periods is expected to disturb marine life across extensive areas, impacting species such as dolphins. The predicted disturbance to a

considerable portion of the local bottlenose dolphin population is alarming, yet the application minimises these concerns without adequate supporting evidence.

Additionally, there is a notable inconsistency in the application regarding the need for licenses to permit harm to European Protected Species, which is acknowledged while simultaneously stating that the impacts are negligible. This contradiction undermines the assessment's credibility and raises compliance issues with the Habitats Regulations, particularly when anticipating harm that necessitates legal authorisation. The assessment further fails to consider cumulative impacts from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a comprehensive analysis of these compounded effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not align with the requirements of the National Planning Framework 4 or the National Marine Plan. It does not demonstrate how the development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, thus precluding any assertion that the proposal constitutes sustainable development. Collectively, the inadequacies surrounding evidence on fishing displacement, the underestimation of acoustic impacts, and the inconsistencies within the assessment highlight its incompleteness and unreliability, obstructing a thorough evaluation of the implications for marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The 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 proposed development introduces permanent red aviation lighting, which would be visible over long distances and create a continuous and intrusive “wall of light” effect across the western horizon. This alteration fundamentally changes the night-time environment, yet the application fails to assess the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. Given the significance of dark skies to the identity of the area and the potential for emerging tourism sectors, such as astro-tourism, this omission in the Environmental Impact Assessment is particularly concerning.

Moreover, the absence of an evaluation of impacts on nocturnal wildlife is critical. 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 cause disorientation and increase the risk of collisions. The application lacks any form of lighting impact assessment or phototaxis study, resulting in a failure to evaluate how aviation lighting could adversely affect these species and potentially increase their mortality rates.

This lack of assessment is exacerbated by the reliance on daytime survey data in the ornithological evaluation, which overlooks nocturnal activity and associated risks. For instance, Kittiwakes may forage or migrate at night and are also susceptible to disorientation from artificial lighting; however, this risk has not been addressed. The failure to provide site-specific night-time data creates a significant gap in

understanding the ecological impacts of the proposed development.

Without a proper 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 is not met, invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, the omission contradicts National Planning Framework 4 concerning the protection of natural places and environmental quality. It further undermines the broader evaluation of landscape and seascape impacts, given that the character of night-time environments is a vital aspect of the overall ecosystem.

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

TOURISM

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

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

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

In an island community characterised by limited economic diversification, the disregard for tourism impacts carries broader repercussions for employment, local

businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been thoroughly evaluated as mandated by the Islands (Scotland) Act 2018.

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm 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

Turbines have a place in our search for net zero but NOT at any price, that price being human health. If we are to sacrifice human life to a Greener planet we don't need turbines at all, but a global mass suicide to rid this planet of her parasites.
As that would of course be unthinkable, a line needs to be drawn with care so that the engineering systems we use to help the planet are not killing wildlife or humans.

The medical standards used for parameters on the effects on human health have changed. Research methods have changed and the standards are more than 30 years out of date

For that reason alone, the erection of these super giant turbines needs pausing until the effects of infra sound generated by them can be examined in detail. We know that various Rogue States are using Infra Sound as a weapon against their enemies, and whilst I am not suggesting these turbines are being weaponized by anyone, we can not in good conscience accept findings that are more than 30 years out of date. Technology has moved on and so has science and our understanding of the damaging and/or indeed useful effects of such unheard sounds.

This application MUST be reexamined in detail and new standards, SAFER standards adhered to. One death caused by neglecting the new findings is one too many to accept, especially under these circumstances.

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: 8F5B6A89

Member of the public 1401

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted in accordance with the relevant marine licensing and Environmental Impact Assessment regimes. A review of the Environmental Impact Assessment Report and associated documentation has revealed material deficiencies in planning, environmental considerations, cultural aspects, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and robust cultural identity. Concerns arise regarding the scale, proximity, and design of the project, which challenge its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application does not provide a sufficient evidential foundation for a lawful determination. Significant environmental data is absent, baseline information is both limited and inconsistent, and several key elements of the proposal remain unspecified. The application's flexible design framework hinders a clear assessment of potential significant effects, and the reliance on unspecified mitigation measures means that their effectiveness cannot be evaluated. Consequently, the available documentation fails to facilitate a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidential support.

There are evident and serious policy conflicts present in the proposal. It appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not sufficiently demonstrate adherence to national mandates aimed at safeguarding biodiversity, climate interests, and environmental integrity. Such discrepancies directly relate to the statutory tests necessary for consent and compromise the competent authority's capacity to deem the development acceptable in policy terms.

The proposal's scale is unprecedented for this location, featuring large turbines situated in close proximity to the shoreline. This introduces significant concerns regarding landscape capacity, visual dominance, and environmental impacts. Collectively, the lack of adequate information, reliance on undefined mitigation measures, evidential shortcomings, and clear policy non-compliance illustrate that the application is incomplete and unable to support a lawful determination. Under these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks essential information, rendering it materially deficient in its account of the potential environmental effects of the proposal. A flexible Project Design Envelope is employed, which does not commit to specific turbine dimensions, layouts, or configurations. This flexibility introduces significant uncertainty and hinders 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 constructed, obstructing both the public and the competent authority from fully comprehending the actual environmental effects.

Additionally, the application is predicated on mitigation measures, monitoring strategies, and management plans that remain undefined. Consent is sought under the premise that any environmental harm will be addressed at a subsequent stage. This approach inhibits a meaningful evaluation of the effectiveness of these measures and the assessment of residual impacts. Such deferral of critical information to post-consent phases is procedurally unacceptable and contravenes the intended purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and corresponding mitigations be clearly established prior to determination.

Furthermore, significant evidential deficiencies arise from gaps in baseline data, limitations in methodology, and an overreliance on assumptions instead of site-specific evidence. These issues lead to uncertainty surrounding the scale and significance of impacts, particularly when negligible or non-significant effects are asserted without adequate supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot align with statutory requirements.

As a result of these shortcomings, the application fails to satisfy the evidential threshold mandated under the Habitats Regulations, which requires exclusion of adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially regarding protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it cannot be established that the impacts have been thoroughly assessed or that suitable safeguards are in place.

In summary, the reliance on an unspecified design envelope, the absence of clearly defined mitigation, and the existence of gaps in baseline data contribute to the unreliability and incompleteness of the Environmental Impact Assessment Report. These deficiencies hinder a lawful and robust assessment of environmental effects, placing the competent authority in a position where it cannot appropriately determine the application based on the information available.

ASSESSMENT OF ALTERNATIVES

The evaluation of alternatives provided in the application is significantly deficient and does not satisfy the legal obligations set forth by the Environmental Impact Assessment

framework. Instead of offering a coherent and analytical comparison of viable alternatives based on their environmental implications, the submission presents a narrative detailing the development's progression. This method inadequately demonstrates that less detrimental options have been thoroughly identified, evaluated, and chosen over more harmful alternatives.

Furthermore, there is a lack of transparent, evidence-backed comparisons regarding different offshore sites, various development scales, or design configurations. Notably, the application fails to illustrate that the developer has genuinely contemplated positioning the turbines further from the shore, where the potential for visual, ecological, and coastal impacts could be considerably diminished. The sensitivity of the West Lewis coastline and the critical role that proximity to the shore plays in assessing impact make this oversight particularly concerning. Without such an analysis, it is impossible to conclude that the proposed location is the least damaging available option.

This shortcoming extends to the assessment of cable routes and landfall, where there is inadequate evidence that alternative pathways have been sufficiently explored to avoid or lessen impacts on sensitive sites, including culturally and spiritually significant areas like Barvas Cemetery. The absence of a clear avoidance strategy and the lack of comparative analysis suggest that mitigation by design has not been adequately utilised, relying instead on measures implemented after the design phase.

Consequently, the application does not convincingly establish that environmental harm has been mitigated through careful site selection, layout planning, and infrastructure routing. This signifies a failure to adhere to the established mitigation hierarchy, which limits the ability of the competent authority to determine whether less harmful and more suitable alternatives are available. In the absence of a thorough assessment of alternatives, one cannot ascertain that the proposal represents a sustainable or compliant approach in line with policy requirements.

From the standpoint of policy adherence, this inadequacy undermines compliance with National Planning Framework 4, particularly regarding the protection of natural environments, cultural heritage, and the wellbeing of the community. The failure to provide a structured and comparative evaluation constitutes a significant omission, contributing to the overall conclusion that the application has not undergone sufficient assessment and cannot warrant a lawful decision.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation concerning marine ecology and protected species is significantly inadequate, failing to deliver a thorough and trustworthy understanding of the ecological receptors present within the West Lewis coastal environment. This region represents a highly sensitive and biologically rich marine system; however, the existing baseline data remains incomplete, and the methodologies employed do not effectively capture the presence, behaviour, and habitat utilisation of various species. Consequently, the assessment lacks a solid evidential basis for assessing potential

impacts.

A critical gap exists in the consideration of otters, which are classified as a European Protected Species. The application does not sufficiently acknowledge or evaluate their active utilisation of coastal areas for foraging and movement. The neglect to consider their core foraging ranges and behavioural patterns means that the potential impacts stemming from construction disturbances, noise, and increased activity have not been sufficiently assessed. This deficiency undermines any assertions regarding the lack of significant effects on this species.

Further shortcomings are noted in the assessment of basking sharks. The reliance on aerial surveys introduces considerable detection bias, particularly under Atlantic conditions. This methodology is likely to lead to an underestimation of their presence, particularly when compared to established land-based observations that indicate frequent utilisation of these waters. The failure to incorporate or adequately assess such data results in an incomplete baseline, thereby diminishing the reliability of the conclusions drawn.

The methodological weaknesses highlighted mean that any conclusions regarding negligible or non-significant effects are based on assumptions rather than strong evidence. The lack of adequate baseline data further obstructs the ability to meaningfully assess cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This introduces uncertainty regarding the actual level of risk faced by marine species and habitats.

From a regulatory standpoint, the application does not comply with the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. The uncertainty created by these deficiencies prevents the dismissal of potential adverse effects beyond reasonable scientific doubt, thus necessitating the invocation of the precautionary principle. Under these circumstances, the granting of consent cannot be executed lawfully.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. The ornithological assessment associated with the application is significantly flawed, with considerable gaps in evidence and internal inconsistencies undermining its conclusions. Notably, the application fails to demonstrate to the required evidential standard that these species will not be adversely affected. It is situated within key foraging areas and migratory

pathways; however, the implications of displacement, collision risk, and habitat loss have not been robustly evaluated.

A fundamental contradiction arises in the application where the developer concludes that there are no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which should only be necessary where significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment and indicates that the conclusions drawn are not adequately supported by the underlying evidence. The assessment lacks sufficient proof that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not fully recognised, and the reliance on modelling approaches introduces further uncertainty, particularly for species in severe decline like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, especially in areas where baseline data is lacking and behavioural responses remain poorly understood.

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

From a regulatory standpoint, the application does not meet the necessary evidential threshold 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 modelling limitations, means that the standard of beyond reasonable scientific doubt has not been achieved. This invokes the precautionary principle, preventing a lawful conclusion in favour of consent. The deficiencies outlined also signify non-compliance with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The failure to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

In summary, the assessment is rendered unreliable due to internal inconsistencies, methodological weaknesses, and inadequate evidence. These deficiencies obstruct a thorough evaluation of 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 proposed development does not adequately assess the cultural heritage and identity of the community, particularly along the West Lewis coastline, which is a vibrant cultural landscape where language, tradition, community, and environment are deeply intertwined. The application takes an overly simplistic view of heritage, treating it as a collection of isolated assets rather than recognising their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming is evident in the treatment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places for burial and spiritual observance, yet the assessment categorises them as static features, overlooking their continued significance and the potential impacts of development on their settings. This misunderstanding leads to an incomplete evaluation of cultural effects and disregards the cemeteries' integral role in community life.

Moreover, the assessment neglects intangible aspects of cultural heritage, such as the Gaelic language, local traditions, and the enduring relationship between the community and its coastal environment. These elements are essential to the area's identity, yet they are entirely omitted from the evaluation, highlighting a crucial gap. The cultural impact of the proposed development cannot be fully comprehended without addressing these factors.

Concerns also arise regarding the rights and engagement of the community. The Gaelic-speaking population possesses a unique cultural identity that aligns with recognised characteristics of Indigenous Peoples. However, there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the credibility of the assessment and fails to adhere to established principles of participation concerning cultural and environmental issues.

Additionally, there is a critical procedural flaw in the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to fulfil its legal obligations to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders a lawful determination impossible.

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

Collectively, the neglect to assess living heritage, intangible cultural values, community rights, and statutory obligations leads to a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application fails to provide a robust basis for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal raises significant concerns regarding social impacts, health, and wellbeing, as the assessment conducted appears to be materially deficient and lacks the necessary transparency for a lawful evaluation. The developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the complete report has not been made public. This absence creates a considerable evidential gap, hindering both the public and the competent authority from grasping the

full extent of the social risks revealed by the developer's own research.

Evidence suggests that residents are currently experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts stem from direct engagement with the community and are therefore based on observable realities rather than speculation. Nevertheless, the failure to disclose the full assessment limits the opportunity for proper scrutiny of the findings and restricts the ability to assess their significance in the decision-making process.

Moreover, there is an indication that the proposal poses a perceived threat to community identity and cohesion, with concerns about "cultural loss" documented in the developer's own findings. Despite this, the full extent of these impacts has not been adequately incorporated into the main application or given the appropriate weight they deserve. The withholding of the complete Social Impact Assessment obscures the genuine human and social costs associated with the development.

This lack of transparency undermines the Environmental Impact Assessment process. An in-depth understanding of the social, economic, and health impacts is crucial for developments of this magnitude, especially when they may affect community character and functioning. By not providing the complete dataset, the application does not offer a comprehensive evidential basis to evaluate the balance between potential benefits and harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. The development should contribute to positive health outcomes and mitigate harm, yet the existing evidence indicates adverse effects that have not been fully disclosed. Without access to the full assessment, it is impossible to verify compliance with this policy.

The procedural implications of this situation are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without the full Social Impact Assessment. This represents a material omission within the application and a failure to meet the evidential requirements established by the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, seascape, and landscape is fundamentally inadequate and does not accurately capture the extent of the changes or the sensitivity of the environment that would be affected. The character of the West Lewis coastline is distinguished by an unspoiled Atlantic horizon, an undeveloped landscape, and a pronounced sense of remoteness. The introduction of large-scale turbines near the

shore would lead to a continuous industrial presence, which would irrevocably transform this character.

Inadequacies in the application extend to its representation of the scale of visual change. The size and placement of the turbines would overshadow views from residential neighbourhoods, historic sites, and popular coastal areas. This would have a direct adverse effect on visual amenity and undermine the intrinsic qualities of naturalness and remoteness. The assessment fails to convey the full significance of this impact in light of the sensitivity of the landscape.

Concerns also arise regarding the methodology used for selecting and presenting visual viewpoints. There is evidence indicating that the viewpoints chosen may not adequately reflect the most sensitive receptors or the worst-case scenarios, particularly with respect to important cultural heritage locations and high-value landscapes. Such shortcomings raise the risk that the actual visual impacts have been understated, which compromises the overall reliability of the assessment.

Another notable deficiency is the lack of evaluation of the interconnectedness between seascape, landscape, and cultural heritage. Notable sites, including 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 heritage assets as isolated entities instead of acknowledging their interdependence, leading to an incomplete understanding of the impacts on their context and cultural significance.

The industrialisation of the seascape would disrupt these vital relationships, altering the context in which heritage assets are perceived and breaking their link to the natural horizon. This constitutes not only a visual impact but also a more extensive cultural and spatial detriment that the application does not sufficiently assess.

From a policy standpoint, the proposal is directly at odds with National Planning Framework 4 regarding the safeguarding of natural places and historic assets. The extent of the changes proposed is incompatible with the imperative to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case impact assessment further weakens any assertions of compliance with policy requirements.

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. Consequently, the resulting change is inherent and permanent, not something that can be reduced to an acceptable level through mitigation efforts.

Overall, the assessment does not accurately depict the scale of the impact, the sensitivity of the environment, or the interconnectedness of landscape and heritage. These shortcomings preclude a dependable evaluation and substantiate the conclusion that the proposal is incompatible with the conservation 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 proposal presents significant risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over an extended period is likely to cause disturbances across large distances, which could adversely affect species such as dolphins. The potential impact on a significant proportion of the local bottlenose dolphin population is concerning; however, the application underplays the importance of these effects without adequate supporting evidence.

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

A critical flaw in the application is the assumption that fishing activity can be relocated without repercussions. There is no evidence provided to indicate that alternative fishing grounds are available, accessible, or able to support the additional pressure that may arise from displacement. This oversight is crucial, as such displacement poses risks of overfishing in other areas and could have broader economic implications for the local fishing fleet. Without a well-founded assessment, the impacts on fisheries and local livelihoods remain inadequately understood.

Inconsistencies within the application further raise concerns, particularly regarding the need for licences to permit harm to European Protected Species, which are acknowledged while simultaneously described as having negligible impacts. This contradiction undermines the credibility of the assessment and raises significant issues related to compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

The assessment also neglects to take into account the cumulative impacts from multiple pressures, such as habitat disturbance, noise, and the displacement of fishing activity. A comprehensive evaluation of these combined effects is essential for determining the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It fails to illustrate that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, which obstructs any conclusion that the proposal signifies sustainable development.

Ultimately, the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and internal inconsistencies compromise the reliability and completeness of the assessment. These deficiencies hinder a robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure presents significant gaps and fails to fully recognise the interconnected nature of the project. The offshore turbines and onshore works should be considered as one integrated project; however, the separate evaluations obscure the true magnitude of environmental and socio-economic effects, resulting in a fragmented understanding.

Onshore activities encompass cabling across protected moorland, the construction of a substation near Stornoway, and the necessary access infrastructure that traverses sensitive landscapes. These undertakings involve excavation in areas of deep peat, particularly within Barvas Moor, which is an important carbon store and an ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, which hampers a comprehensive understanding of the project's overall environmental footprint.

By deferring the assessment of onshore impacts, the application limits the evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all project components be considered collectively; however, the division between offshore and onshore elements means the combined impacts on peatlands, habitats, and local communities remain unclear.

There are also notable risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application fails to demonstrate that these habitats have been thoroughly assessed or that suitable avoidance measures have been adopted. This evidential gap poses a threat to biodiversity protection.

Additionally, there are concerns about carbon balance due to the disturbance of peatland, which releases stored carbon and may lead to a carbon debt, counteracting the aims of renewable energy development. The application does not sufficiently tackle this concern or show that the overall carbon balance is advantageous.

Furthermore, routing infrastructure through active croft land raises potential conflicts with current land use and legal rights. The application does not provide evidence that the requisite consents or processes have been initiated, casting doubt on the project's feasibility and legality.

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

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

TOURISM

The assessment of tourism impacts presented in the application is inadequate, as it neglects to evaluate the economic and social repercussions for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the region's wild coastline, nearly untouched landscapes, dark skies, and sense of remoteness. Although it is noted that 86% of visitors are attracted by the scenery, there is no quantified analysis of how large-scale offshore infrastructure could influence visitor numbers, behaviour, or the overall economic contribution.

The growth of tourism in the area has been notable, with revenues increasing from £65 million in 2017 to more than £81.5 million, thus supporting over 1,000 jobs and representing up to 16% of the island's economy. However, the application fails to model the potential impacts of industrialising the seascape and the associated loss of environmental quality on Tourism Gross Value Added or the broader economic resilience of the area. Without this analysis, it remains uncertain whether the development would yield a net economic benefit or jeopardise an established and expanding sector.

The significance of environmental quality in enhancing tourism, particularly the value of unspoiled landscapes and dark skies for visitor experiences and emerging sectors like nature-based tourism and astro-tourism, is also overlooked. The absence of a Dark Skies Assessment exacerbates this shortcoming, creating a considerable gap in understanding the impact on a recognised and growing component of the local economy.

Considering the limited economic diversification within the island community, the neglect of tourism impact assessments carries broader implications for employment, local enterprises, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been addressed as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not substantiate its compliance with National Planning Framework 4, especially regarding economic impact and the necessity to demonstrate net benefits. It also contradicts strategic goals that designate tourism as a priority growth sector and fails to furnish adequate evidence for the competent authority to evaluate the economic ramifications of the proposal.

In summary, the combination of unquantified tourism impacts, a lack of assessment regarding environmental influences on visitor behaviour, and the omission of the island's economic dependencies results in a significant evidential gap. This absence hampers 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 highlights significant deficiencies that undermine its alignment with sustainable development principles. It echoes the core concerns that led to the rejection of the Lewis Wind Power proposal in

2008, where the unacceptable scale of industrialisation was a primary issue. Despite being submitted under an enhanced policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application fails to adequately address these crucial aspects.

A reliable evidential basis for decision-making is lacking, with critical gaps in baseline data. The design envelope remains undefined, and unspecified reliance on mitigation measures raises concerns. Furthermore, key impact pathways—such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism—are overlooked. This leads to an incomplete Environmental Impact Assessment, which does not sufficiently inform stakeholders about likely significant effects or residual impacts.

The proposal also reveals procedural shortcomings, including the lack of a compliant Island Communities Impact Assessment, which breaches statutory obligations under the Islands (Scotland) Act 2018. Additionally, the incomplete disclosure of the Social Impact Assessment is a serious omission that hampers the competent authority's ability to evaluate effects on community wellbeing, cultural identity, and economic resilience. Such inadequacies render the application unfit for determination.

Moreover, the proposal is at odds with National Planning Framework 4, as it does not demonstrate the necessary protections for biodiversity, natural places, and cultural heritage. There is no assurance that health and wellbeing impacts are acceptable, nor is there evidence of a net economic benefit, particularly due to the lack of tourism impact analysis. The cumulative effects of both offshore and onshore elements are inadequately assessed, obscuring their influence on peatlands, carbon balance, habitats, and crofting land.

Uncertainties regarding environmental risks persist, particularly in relation to marine ecology, seabirds, protected species, and marine mammals. The assessments are incomplete and, in certain areas, inconsistent. The evidential threshold required to eliminate adverse effects beyond reasonable scientific doubt has not been satisfied, necessitating the application of the precautionary principle. This failure to meet evidential standards prevents the conclusion 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 adverse impacts on tourism result in permanent effects that cannot be mitigated to an acceptable level.

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

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

Additional Comments

I am writing myself to object to the proposed Spiorad na Mara Offshore Wind Farm. I object in the strongest possible terms, and I ask that consent and the associated marine licences are refused.

I live at 1 Arnol and I am 82 years old. I am largely housebound now, and my garden is one of the only places I can still go on my own. Being able to look out from my home and garden across the coast is one of the few things I can still enjoy each day. I sit outside when I can, watch the weather and the light change, and see the birds passing overhead. I am a deeply religious person, and this outdoor space is also where I pray and feel close to God. It means a great deal to me, and it helps me stay calm and cope.

This has been my family home where I married and brought up my children. I lost my husband in 2016 and I lost my only son in July last year. Since those losses, being at home, in the garden where we spent time together, and with the familiar outlook to the coast has been especially important to me in getting through each day.

When I look out from my home and garden, I am also looking out on a place filled with memories of my husband and my son. When I try to picture this proposal in that same view, I see tall towers across the horizon, blades turning, and warning lights blinking in the dark. Instead of an open, natural coastline and sea, it would feel like an industrial skyline. I find that thought intrusive and distressing, and I do not want my remaining years at home overshadowed by this.

I have so many memories of my children—and now my grandchildren—growing up here, surrounded by the sea and our way of life. I relive those times often: the simple, ordinary days that meant everything. Those memories are tied to this place and this view, and I cannot bear the thought of it being replaced by an industrial horizon.
I have now passed the house on to my daughter, who lives with me and will take on the croft tenancy, but I will remain living here for the rest of my life. This makes it even more important to me that the quiet character of this place—including the outlook and dark nights—is not taken away.

I am very worried that a large offshore turbine development, and especially any night-time warning lights, would permanently change this outlook and take away the peace and darkness that we have here. I am often awake through the night. At those hours, the quiet and darkness help me feel safe and settled, and I try to rest when I can. The thought of repetitive flashing lights on the horizon is frightening to me, and I worry it would leave me feeling constantly unsettled and unable to relax. This would be a real harm to my wellbeing.

Please confirm that you have received my objection and that it will be fully considered

as part of the decision. Please keep me informed of the outcome. I will keep this matter in my prayers.

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: 7E91E58C

Member of the public 1402

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the marine licensing and Environmental Impact Assessment regulations. The objection is grounded in a detailed review of the Environmental Impact Assessment Report alongside other supporting documents, highlighting several material deficiencies related to planning, environmental factors, cultural concerns, and procedural aspects. Situated off the west side of the Isle of Lewis, the proposed development area is characterized by its Atlantic-facing coastline, a near-pristine environment, and a significant cultural identity. The size, proximity, and design of the wind farm raise serious questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks sufficient evidence for a lawful determination. There are substantial gaps in critical environmental data, with baseline information that is both limited and inconsistent, and many elements of the proposal remain undefined. The flexible design framework employed obscures an understanding of likely significant effects, and the dependence on unspecified mitigation measures renders any assessment of their effectiveness impossible. Consequently, the supporting documentation does not facilitate a comprehensive understanding of the environmental, cultural, or community impacts, and assertions regarding negligible or non-significant effects are not backed by robust evidence.

There are evident policy conflicts within the proposal. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regulations, and National Planning Framework 4, especially concerning biodiversity, natural areas, cultural heritage, and public health and wellbeing. The application fails to establish that it can meet national standards for protecting biodiversity, climate interests, and environmental integrity. These discrepancies are crucial as they pertain to the statutory tests necessary for consent and compromise the competent authority's ability to determine the development's acceptability in policy terms.

The scale of the proposed wind farm is unprecedented for this location, with large turbines set very close to the shoreline, which raises significant concerns about landscape capacity, visual dominance, and overall environmental impact. Collectively, the insufficient information provided, reliance on undefined mitigation strategies, evidential deficiencies, and clear non-compliance with policy indicate that the application is incomplete and unable to facilitate a lawful decision. In light of these issues, it is essential that the precautionary principle is applied.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment fails to adequately identify and evaluate protected species, specifically otters, which are a European Protected Species. The application does not recognise their foraging and movement patterns along the coast. This oversight means that the potential impacts from construction activities, noise, and increased human presence have not been properly assessed. Consequently, the conclusions regarding the lack of significant effects on otters are not credible.

The methodologies used in the assessment are also problematic, particularly in relation to basking sharks. Aerial surveys are relied upon, which can create a significant detection bias, especially under Atlantic conditions. This approach is likely to underestimate the presence of basking sharks, especially when compared to established observations from land that show frequent use of these waters. The failure to properly consider this data leads to an incomplete understanding and compromises the conclusions drawn.

There are broader implications arising from these methodological deficiencies. The conclusions that suggest negligible effects are based on assumptions rather than strong evidence. Furthermore, the lack of comprehensive baseline data limits the ability to assess cumulative and indirect impacts on marine species, particularly considering seasonal variations and the interactions within the wider ecosystem. This introduces uncertainty about the actual risks to marine habitats and species.

From a regulatory viewpoint, the application does not adhere to the requirements set out by the Environmental Impact Assessment regime and National Planning Framework 4. The failure to adequately identify and assess protected species means that uncertainties about adverse effects cannot be dismissed with reasonable scientific certainty, thereby invoking the precautionary principle. Under these conditions, granting consent would not be lawful.

Overall, the assessment is rendered unreliable due to incomplete baseline data, flawed methodologies, and unsupported conclusions. These shortcomings hinder a thorough evaluation of impacts on marine ecology and protected species, leading to the conclusion that the application lacks a solid evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, revealing significant gaps in evidence and inconsistencies that compromise its conclusions. It is essential to recognise that the west coast of the Isle of Lewis is home to internationally significant seabird populations, many of which are already facing decline. However, the application fails to provide the necessary evidential standard to prove that these species will remain unaffected. The proposed site is situated within critical foraging areas and migratory routes, yet the assessment inadequately evaluates the risks related to displacement, collision, and habitat loss.

Moreover, there exists a crucial contradiction within the application itself, as the developer asserts no significant adverse effects while simultaneously submitting a

Habitats Regulations derogation case. Such a derogation is only warranted when significant harm is anticipated. This inconsistency raises serious doubts regarding the reliability of the assessment and suggests that the conclusions drawn are not supported by the evidence presented.

The evaluation 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 is not thoroughly addressed, and the reliance on modelling methods injects uncertainty, particularly for species that are already in serious decline, such as Kittiwakes and Fulmars. The methodologies employed may underestimate mortality rates, especially given the incomplete baseline data and the incomplete understanding of behavioural responses.

Additionally, the placement of turbines within a recognised migratory corridor poses another substantial risk, as it effectively obstructs a primary flight path used by species migrating between the United Kingdom and Iceland. The application fails to provide a thorough assessment of 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 required to ascertain that there will be no adverse effect on the integrity of protected sites. The presence of contradictory findings, coupled with data deficiencies and limitations in the modelling, signifies that the standard of beyond reasonable scientific doubt has not been satisfied. This situation invokes the precautionary principle and prohibits a lawful conclusion that would support consent.

The identified deficiencies also indicate non-compliance with the National Planning Framework 4 concerning the protection of biodiversity and the preservation of natural assets. The failure to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct opposition to national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development fails to adequately assess cultural heritage and community identity along the West Lewis coastline. This area is a living cultural landscape where the environment, language, tradition, and community are interconnected. Instead of recognising these relationships, the application takes a reductive approach, viewing heritage as isolated and static rather than dynamic and socially significant.

The treatment of important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, highlights a significant deficiency. These cemeteries serve as active places of burial and spiritual practice, yet the assessment treats them as fixed features. It overlooks their ongoing use and the development's impact on their surroundings, leading to an incomplete evaluation of cultural effects and neglecting their importance in community life.

Additionally, the assessment does not consider intangible cultural heritage, such as the Gaelic language and the traditions that reflect the community's long-standing relationship with the coastal environment. These aspects are essential to the area's identity, yet they are notably absent from the evaluation, indicating a critical omission that hinders a proper understanding of the development's cultural impact.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, with its distinct cultural identity that aligns with Indigenous characteristics, has not been included in a Free, Prior and Informed Consent process. This lack of meaningful engagement undermines the assessment's credibility and disregards established participation principles in decisions affecting cultural and environmental interests.

Moreover, a vital procedural failure is the absence of a compliant Island Communities Impact Assessment, which is required by the Islands (Scotland) Act 2018. Without this assessment, the responsible authority cannot adequately 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 in direct conflict with National Planning Framework 4, especially concerning the protection of historic assets and places. The neglect to consider both tangible and intangible heritage and to acknowledge living cultural practices signifies a clear violation of policy requirements.

In summary, the failure to assess living heritage, intangible cultural value, community rights, and compliance with statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been thoroughly evaluated, and the application lacks a solid foundation for assessing the true cultural costs of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency regarding social impacts, health, and wellbeing is a critical issue that undermines the evaluation process. A Social Impact Assessment was commissioned by the developer and involved focus groups with local residents; however, the full report has not been made public. This significant gap in evidence inhibits both public understanding and the competent authority's ability to grasp the full extent of the social risks identified through the developer's own findings.

Evidence suggests that local residents are currently facing measurable stress, anxiety,

and concern due to the scale and proximity of the proposed development. These effects stem from direct engagement with the community and are therefore based on actual experiences rather than speculation. Yet, the omission of the full assessment stymies proper scrutiny of these findings and hampers the assessment of their implications within the decision-making framework.

Additionally, there are indications that the proposal is viewed as a threat to community identity and cohesion, with the term "cultural loss" featured in the developer's findings. Nonetheless, these impacts have not been adequately included in the main application or given the necessary consideration. By withholding the complete Social Impact Assessment, the true human and social costs of the development remain obscured.

This lack of transparency has repercussions for the Environmental Impact Assessment process. It is vital to fully understand the social, economic, and health impacts associated with developments of this magnitude, especially when community character and functionality are at stake. Without the complete dataset, the application does not present a comprehensive evidential basis to properly weigh the benefits against the potential harms.

From a policy standpoint, the application is insufficient in demonstrating alignment with National Planning Framework 4 concerning health and wellbeing. Development initiatives are required to foster positive health outcomes and mitigate harm; however, the existing evidence reveals adverse effects that have not been fully disclosed. Without the complete assessment, it is impossible to ascertain compliance with these policy requirements.

The procedural ramifications are significant. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a substantial omission in the application, failing to meet the evidential standards established by the Environmental Impact Assessment regime.

In conclusion, the non-disclosure of the full Social Impact Assessment, coupled with evidence of current adverse impacts, results in an assessment that is both incomplete and unreliable. This circumstance prevents a lawful determination and reinforces the assertion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual impacts associated with the proposal is severely lacking and does not sufficiently capture the scale of change or the sensitivity of the West Lewis coastline. This area is characterised by its open Atlantic horizon, undeveloped nature, and significant remoteness. The introduction of large-scale turbines near the shoreline would create a continuous industrial presence that fundamentally alters this character, leading to a permanent and irreversible transformation of the landscape.

The application fails to adequately reflect the magnitude of visual change anticipated.

Given their size and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations. Such an impact would directly affect visual amenity and compromise the essential qualities of naturalness and remoteness. The assessment does not convey the extent of this impact or its significance within the context of such a sensitive landscape.

There are also significant methodological issues concerning the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints might not adequately represent the most sensitive receptors or worst-case scenarios, particularly in relation to key cultural heritage sites and high-value landscapes. This raises concerns that the visual impact has been understated, which undermines the reliability of the assessment.

Another critical shortcoming is the lack of an assessment of the interconnected relationship between landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are situated within a broader landscape setting that is visually and spatially connected to the Atlantic horizon. The assessment treats these assets as isolated, failing to acknowledge their interdependence, which results in an incomplete evaluation of 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 represents not only a visual impact but also a broader cultural and spatial harm that has not been thoroughly assessed in the application.

From a policy standpoint, the proposal conflicts with National Planning Framework 4 concerning the safeguarding of natural places and historic assets. The anticipated scale of change is incompatible with the obligation to protect landscape character, visual amenity, and the setting of culturally significant sites. The lack of a robust worst-case assessment further undermines any claims of compliance with policy.

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

Collectively, these deficiencies prevent a reliable evaluation of the proposal and reinforce the conclusion that it is incompatible with the protection of this landscape. The assessment does not accurately reflect the scale of impact, the sensitivity of the environment, or the interconnected nature of landscape and heritage.

CONSTRUCTION AND POLLUTION RISKS

The application proposes substantial seabed preparation and installation works in a high-energy Atlantic environment; however, the assessment of construction and pollution risks is incomplete. There are no fully developed Construction Environmental

Management Plans or Pollution Prevention Plans, which results in reliance on mitigation and contingency measures that are to be prepared after consent. This approach prevents any meaningful evaluation of their adequacy or effectiveness.

The lack of defined future measures is especially concerning given the sensitivity of the receiving environment along the West Lewis coastline, which supports clean coastal waters and habitats that are vulnerable 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 detail on prevention, control, or monitoring of these risks.

Moreover, there is uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, the extent, duration, or ecological effects of these impacts cannot be determined. This uncertainty also extends to the potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning until after consent, the application fails to allow for an evaluation of whether suitable safeguards are in place to address pollution events. This introduces procedural risk and undermines the competent authority's ability to assess environmental protection measures at the time of determination.

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

Overall, the shortcomings arising from the absence of defined mitigation measures, lack of detailed management plans, and the uncertainty regarding potential impacts render the assessment materially deficient. These issues hinder a robust evaluation of construction and pollution risks and further substantiate the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal raises significant concerns regarding its impact on fisheries and marine life, particularly due to its inadequate assessment of ecological and socio-economic effects. The coastal waters off West Lewis are home to a vibrant marine ecosystem and support a thriving fishing industry, yet the application does not convincingly show how these activities and habitats can be preserved without considerable disruption.

A critical flaw in the application is the presumption that fishing activities can be

relocated without repercussions. There is no evidence provided that alternative fishing grounds are available or capable of absorbing the additional fishing pressure. This lack of information is crucial, as it may lead to overfishing in other areas and could have severe economic repercussions for the local fishing fleet. The absence of a thorough and evidence-based assessment inhibits a proper understanding of the implications for fisheries and the livelihoods dependent on them.

Moreover, the proposal poses significant risks to marine species, particularly due to underwater noise generated during construction activities. The anticipated high-energy hammer piling over a prolonged period is likely to disrupt marine life across extensive distances, particularly affecting species such as dolphins. The predicted disturbance to a substantial portion of the local bottlenose dolphin population is concerning; however, the application inadequately addresses these impacts, downplaying their importance without sufficient evidence.

Additionally, the application exhibits a contradiction by acknowledging the necessity of licenses to allow harm to European Protected Species while simultaneously claiming that the impacts are negligible. This inconsistency calls into question the credibility of the assessment and raises issues regarding adherence to the Habitats Regulations, especially when anticipated harm necessitates legal authorisation.

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

From a policy standpoint, the application falls short of demonstrating compliance with the National Planning Framework 4 and the National Marine Plan. It fails to establish that the development can coexist with current marine users or avoid significant negative effects on marine biodiversity, thus undermining any argument for the proposal being a form of sustainable development.

In summary, the deficiencies surrounding the evidence of fishing displacement, the underestimation of acoustic impacts, and the internal contradictions within the assessment render it incomplete and unreliable. These shortcomings prevent a comprehensive evaluation of the potential impacts on marine life and fisheries.

TOURISM

The assessment presented regarding tourism impacts is severely lacking and does not sufficiently evaluate the economic and social repercussions for a vital sector of the Isle of Lewis economy. It is important to note that tourism is primarily reliant on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. The application acknowledges that 86% of visitors are attracted by the scenery, yet it fails to provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism has experienced significant growth, increasing from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. However, the application does not consider how the industrialisation of the seascape and the subsequent loss of environmental quality could impact Tourism Gross Value Added or broader economic resilience. Without this critical analysis, it is impossible to ascertain whether the development would yield a net economic benefit or harm an established and growing sector.

Moreover, the assessment neglects to take into account the role of environmental quality in bolstering tourism, particularly the significance of unspoiled landscapes and dark skies for visitor experience, alongside burgeoning markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this issue, resulting in a significant gap in understanding the impacts on a recognised and expanding aspect of the local economy.

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

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

In summary, the inability to quantify tourism impacts, evaluate the environmental factors influencing visitor behaviour, and recognise the island's economic dependency leads to a substantial evidential gap. This prevents a thorough evaluation of economic effects and contributes to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm 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: 3204C4FC

Member of the public 1403

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 review of the Environmental Impact Assessment Report and its accompanying documentation has revealed serious deficiencies in material planning, environmental considerations, cultural impacts, and procedural adherence. The development is situated off the west side of the Isle of Lewis, an area recognised for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The design, proximity, and scale of the proposal raise significant concerns regarding its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a solid evidential foundation for a lawful decision. There is a critical absence of environmental data, while the baseline information provided is both limited and inconsistent. Important aspects of the proposal are still undefined. The implementation of a flexible design framework obscures the understanding of potential significant effects, and 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, or community impacts, and the assertions of negligible or non-significant effects lack robust supporting evidence.

Moreover, the proposal presents clear and substantial conflicts with established policy. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not sufficiently demonstrate compliance with national obligations to protect biodiversity, climate interests, and environmental integrity. These conflicts directly impact the statutory tests necessary for consent and compromise the capacity of the competent authority to deem the development acceptable in policy terms.

The scale of the proposal is unprecedented for this location, with large turbines positioned very close to the shoreline, raising serious concerns related to landscape capacity, visual dominance, and overall environmental impact. Collectively, the lack of sufficient information, the reliance on undefined mitigation, evidential weaknesses, and evident policy non-compliance indicate that the application is incomplete and does not support a lawful determination. In light of these factors, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is flawed and does not give a full or clear account of the environmental effects of the proposal. The use of a flexible Project Design Envelope means there are no specific commitments to turbine dimensions, layouts, or configurations. This creates uncertainty and complicates the application of a worst-case scenario, ultimately undermining the integrity of the assessment. As a result, the impacts described may not accurately reflect the actual development, leaving both the public and the competent authority unable to grasp the true extent of the environmental effects.

The application depends on mitigation measures, monitoring strategies, and management plans that have not been defined. This means consent is sought on the understanding that environmental harm will be dealt with later, which obstructs any meaningful evaluation of their 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 requires that significant effects and mitigation strategies are established prior to making decisions.

There are also serious gaps in evidence, such as missing baseline data and methodological limitations. Reliance on assumptions instead of site-specific evidence adds to the uncertainty regarding the impact's scale and significance. Conclusions of negligible or non-significant effects lack robust supporting data, and the insufficient information hampers a clear understanding of cumulative and worst-case impacts. This introduces scientific uncertainty that does not meet 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 brings the precautionary principle into play, especially concerning protected species and sensitive habitats. Additionally, the proposal does not comply with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, since it cannot be shown that impacts have been fully assessed or that suitable safeguards are established.

Overall, the reliance on an undefined design envelope, lack of specified mitigation, and the gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings prevent a proper and lawful assessment of environmental effects, which means the competent authority cannot make an informed decision based on the information provided.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

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

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

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

A critical procedural failure is the lack of a compliant Island Communities Impact Assessment, a legal requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot fulfil its legal obligation to evaluate the social, cultural, and economic effects on the island community, rendering a lawful determination impossible.

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The evaluation of social impacts, health, and wellbeing related to the proposal is critically flawed and lacks the necessary transparency for a valid assessment. Although the developer engaged local residents through focus groups and commissioned a Social Impact Assessment, the complete report has not been released. This significant gap in evidence hinders both public understanding and the competent authority's ability to evaluate the social risks highlighted by the developer’s research.

Residents are reportedly enduring heightened levels of stress, anxiety, and concern due to the scale and proximity of the development, as indicated by available summaries. These concerns stem from direct interactions, which means they are based on actual experiences rather than speculation. However, the absence of the full assessment limits scrutiny of these findings, making it difficult to ascertain their importance in the decision-making process.

There is also a strong sentiment among the community that the development threatens their identity and cohesion, with “cultural loss” noted in the developer’s findings. Unfortunately, these social impacts have not been adequately incorporated into the main application or appropriately considered. The failure to disclose the complete Social Impact Assessment obscures the actual social and human costs associated with the development.

Moreover, this lack of transparency compromises the Environmental Impact Assessment process. Understanding the social, economic, and health implications is vital for large-scale developments, especially when they may affect community character and functioning. By withholding the complete data, the application does not offer a comprehensive evidential basis to evaluate the balance between potential benefits and detriments.

From a policy standpoint, the application does not show compliance with the National Planning Framework 4 concerning health and wellbeing. Developments are required to promote positive health outcomes and avoid causing harm, yet the existing evidence points to negative effects that have not been fully disclosed. Without the entire assessment, it cannot be demonstrated that the application meets this policy requirement.

The procedural consequences are significant as well. The competent authority is unable to perform a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a material shortcoming within the application and a failure to satisfy the evidential standards set forth by the Environmental Impact Assessment framework.

In conclusion, the combination of the non-disclosure of the full Social Impact Assessment and the evidence of existing adverse impacts results in an incomplete and unreliable assessment. This undermines the potential for a lawful determination and highlights that the application lacks sufficient information to be considered valid.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The application proposes the introduction of large-scale turbines in close proximity to the West Lewis coastline, an area characterised by an open Atlantic horizon, an undeveloped character, and a strong sense of remoteness. This proposal would create a continuous and dominant industrial presence that fundamentally alters the existing character, leading to a permanent and irreversible transformation of the landscape. The assessment provided does not adequately represent the scale of this visual change,

which would dominate views from residential areas, historic sites, and popular coastal locations. This would significantly impact visual amenity and diminish the defining qualities of naturalness and remoteness, yet the assessment fails to convey the true level of impact or its significance within such a sensitive landscape.

Concerns arise regarding the methodology used in the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not adequately reflect the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This suggests that the assessment may have understated the magnitude of visual impact, thereby undermining its reliability.

Moreover, the assessment does not properly consider the interconnected relationship between landscape, seascape, and cultural heritage. Significant sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape, visually and spatially linked to the Atlantic horizon. Treating these heritage assets as isolated entities fails to acknowledge their interdependence, resulting in 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 these heritage assets are experienced and disrupting their connection to the natural horizon. This represents a broader cultural and spatial harm that remains inadequately assessed in the application.

From a policy standpoint, the proposal conflicts with National Planning Framework 4 regarding the protection of natural places and historic assets. The scale of the proposed changes contradicts the requirement to safeguard landscape character, visual amenity, and the setting of culturally significant sites. Additionally, the lack of a robust worst-case assessment further undermines any assertions of policy compliance.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The offshore turbines and onshore works are part of a single integrated project that must be considered together. However, the assessment of onshore infrastructure remains significantly incomplete, failing to address the full scope of impacts. This fragmented evaluation obscures the true extent of environmental and socio-economic effects associated with the project.

Onshore elements of the project involve substantial construction activities, including the installation of cabling across protected moorland and the construction of a substation near Stornoway, as well as the development of access routes through sensitive landscapes. These actions entail excavation in areas of deep peat, particularly within Barvas Moor, which serves as a vital carbon store and ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, resulting in an inadequate understanding of the overall environmental footprint of the project.

By failing to assess onshore impacts appropriately, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all parts of a project should be examined collectively, yet the current separation of offshore and onshore elements means the combined impacts on peatlands, habitats, and local communities are not fully understood.

The proposal also poses significant risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The assessment does not sufficiently demonstrate that impacts on these habitats have been fully explored or that adequate avoidance measures have been implemented, resulting in a notable evidential gap concerning biodiversity protection.

Concerns regarding carbon balance are also raised by this proposal. Disturbance of peatland can release stored carbon, potentially leading to a carbon debt that undermines the objectives of renewable energy initiatives. The application does not sufficiently address this critical issue or provide assurance that the overall carbon balance remains advantageous.

Furthermore, the routing of infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. The application fails to offer evidence that the necessary consents or processes have been initiated, prompting questions about the deliverability and lawful implementation of the project.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal significantly neglects the assessment of dark skies and nocturnal wildlife, which is a serious gap in the Environmental Impact Assessment. The West Lewis coastline is defined by its exceptionally dark skies, integral to the area's environmental quality, cultural identity, and tourism appeal. The introduction of permanent red aviation lighting would create a continuous and intrusive "wall of light" across the western horizon, fundamentally changing the night-time environment.

There is no evaluation of how this lighting might impact visual amenity, landscape character, or the experience of both residents and visitors. This is particularly concerning given the value of dark skies to the local identity and the emerging sectors of tourism like astro-tourism. The lack of consideration for these effects results in a clear deficiency in the overall landscape and environmental assessment.

Moreover, the impacts on nocturnal wildlife are not addressed. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting, which can lead to disorientation and an increased risk of collision. The application lacks any assessment of lighting impacts or studies on phototaxis, meaning it does not evaluate how aviation lighting could affect these species or contribute to mortality rates.

This issue is compounded by the use of daytime survey data in the ornithological assessment, which fails to account for nocturnal activities and their associated risks. Species such as Kittiwakes, which may forage or migrate during the night, are also at risk of disorientation from artificial lighting, yet this has not been investigated. The absence of site-specific night-time data presents a critical shortfall in understanding the ecological impacts.

Without proper assessment of nocturnal effects, it is impossible to ascertain whether protected species or designated sites may face adverse impacts. The required evidential standard to eliminate adverse effects beyond reasonable scientific doubt is not fulfilled, invoking the precautionary principle and hindering a lawful determination.

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

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

TOURISM

The tourism sector on the Isle of Lewis is crucial to the local economy, having seen substantial growth 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 lacks a thorough assessment of tourism impacts, failing to evaluate how large-scale offshore infrastructure would affect visitor numbers, behaviour, and overall economic contribution, despite acknowledging that 86% of visitors are attracted by the area's scenery.

Furthermore, the assessment does not consider how the industrialisation of the seascape and a potential decline in environmental quality could influence Tourism Gross Value Added or the economic resilience of the community. Without this analysis, it remains unclear whether the proposed development would provide a net economic benefit or jeopardise a vital and growing sector.

The report also overlooks the importance of environmental quality in enhancing the visitor experience, neglecting factors such as unspoiled landscapes and dark skies, which are essential to nature-based tourism and astro-tourism. The omission of a Dark Skies Assessment further highlights the deficiencies in the evaluation, leaving a considerable gap in understanding its impact on a recognised and expanding segment of the local economy.

In a context where the island community has limited economic diversification, the lack of assessment regarding tourism impacts poses significant risks for employment, local businesses, and community sustainability. Additionally, the absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities, as required under the Islands (Scotland) Act 2018, have not been addressed.

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

The cumulative failure to quantify tourism impacts, analyse environmental factors that drive visitor behaviour, and acknowledge the island's economic dependency results in a substantial evidential gap. This inhibits a robust assessment of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed, failing to meet the criteria for sustainable development as outlined in statutory obligations, national policy, and evidential standards. It revisits the core concerns that resulted in the rejection of the Lewis Wind Power application in 2008, specifically regarding the unacceptable scale of industrialisation. This current application is presented within a more robust policy context that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant deficiencies in the evidential basis provided for the determination of this application. It lacks comprehensive baseline data and relies on an undefined

design envelope, alongside unspecified mitigation measures. Moreover, it overlooks critical impact pathways, such as those affecting nocturnal wildlife, the complete onshore infrastructure, and potential tourism impacts. As a result, the Environmental Impact Assessment remains incomplete, failing to offer a thorough understanding of likely significant effects or residual impacts.

Procedurally, there are evident failures as well. The lack of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty in accordance with the Islands (Scotland) Act 2018. Additionally, the failure to provide a complete Social Impact Assessment represents a significant omission. These issues hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal is in direct opposition to the National Planning Framework 4, lacking the demonstration of biodiversity protection, safeguarding of natural places and cultural heritage, and acceptable health and wellbeing impacts. It fails to provide evidence of a net economic benefit, particularly due to the absence of tourism impact modelling. Furthermore, it has not adequately assessed the cumulative effects of both offshore and onshore elements, thus obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are both incomplete and, at times, inconsistent. The necessary evidential threshold required to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

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

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

It is thus formally requested that the application for the Spiorad na Mara Offshore Wind Farm is entirely refused.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: DDF3411C

Member of the public 1404

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

The application does not 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 prevents a clear understanding of likely significant effects, while the reliance on mitigation measures that have not yet been specified means their effectiveness cannot be assessed. Consequently, the documentation does not enable a full or informed understanding of environmental, cultural, or community impacts. Claims of negligible or non-significant effects are not supported by robust evidence.

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

Given the absence of sufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance, it is evident that the application is incomplete and incapable of supporting a lawful determination. In these circumstances, the precautionary principle must apply. The development is located off the west side of the Isle of Lewis, an area defined by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The concerns raised regarding the compatibility of the proposal with statutory requirements, national policy, and the principles of sustainable development are fundamental.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally lacking, failing to deliver a comprehensive, clear, or dependable overview of the anticipated environmental repercussions of the proposal. The reliance on a flexible Project Design Envelope, which does not commit to particular turbine dimensions, layouts, or

configurations, creates a considerable degree of uncertainty. This uncertainty undermines the reliability of the assessment, meaning that the potential impacts may not accurately reflect the development that will ultimately be built. Consequently, both the public and the competent authority are left without a proper understanding of the true scope of environmental effects.

Moreover, the application places significant emphasis on mitigation measures, monitoring strategies, and management plans that have yet to be established. By seeking consent on the premise that environmental damage will be mitigated later, there is a lack of opportunity for meaningful evaluation of these measures or assessment of any residual impacts. This postponement of crucial information to stages following consent is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which stipulates that likely significant effects and mitigation must be clearly defined before determination.

The report also exhibits serious evidential shortcomings, with gaps in baseline data, limitations in methodology, and an over-reliance on assumptions rather than site-specific evidence. This leads to uncertainties about the scale and significance of impacts, particularly when findings of negligible or non-significant effects are presented without solid supporting data. The insufficient information hinders a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot align with statutory obligations.

As a result, the application does not satisfy the evidential criteria required under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially regarding protected species and sensitive habitats. Furthermore, the proposal does not demonstrate adherence to National Planning Framework 4, including stipulations related to biodiversity protection and environmental integrity, since it cannot be shown that impacts have been thoroughly assessed or that suitable safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specific mitigation, and the deficiencies in baseline data culminate in an Environmental Impact Assessment Report that is neither reliable nor complete. These issues preclude a lawful and rigorous evaluation of environmental effects, leaving the competent authority ill-equipped to make a determination based on the information presented.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is severely lacking, failing to provide a comprehensive understanding of the ecological receptors within the West Lewis coastal environment. This area is a biologically rich and sensitive marine system, yet it suffers from incomplete baseline data and inadequate methodologies that do not effectively capture the presence, behaviour, and habitat use of various species. Consequently, the assessment lacks a solid evidential foundation for evaluating potential impacts.

One significant oversight involves otters, which are classified as a European Protected Species. The application does not sufficiently acknowledge or assess their active use of coastal regions for foraging and movement. This omission regarding their core foraging range and behavioural patterns means that the potential effects of construction disturbance, noise, and increased human activity have not been properly evaluated. This gap undermines the conclusions drawn about the absence of significant effects on otters.

The assessment of basking sharks also displays major deficiencies, particularly due to the reliance on aerial surveys, which are prone to detection bias in Atlantic conditions. This method is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that demonstrate frequent use of these waters. The failure to consider or incorporate relevant data results in an incomplete baseline and diminishes the reliability of the conclusions presented.

These methodological shortcomings mean that assertions of negligible or non-significant effects rest on assumptions rather than solid evidence. The lack of sufficient baseline data hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions, thereby introducing uncertainty regarding the true risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime and the National Planning Framework 4. Protected species have not been properly identified or assessed, which leads to a level of uncertainty that prevents the exclusion of adverse effects beyond reasonable scientific doubt, invoking the precautionary principle. Under these circumstances, it would be unlawful to grant consent.

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

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 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 social impacts, health, and wellbeing associated with the proposed development is fundamentally inadequate and lacks the necessary transparency for a lawful evaluation. A Social Impact Assessment was commissioned by the developer, which included focus groups involving local residents, yet the complete report has not been made available to the public. This omission creates a significant evidential gap, hindering both the public and the competent authority from fully understanding the social risks identified through the developer's own investigations.

Residents have expressed measurable levels of stress, anxiety, and concern related to the scale and proximity of the proposal, as evidenced by direct engagement rather than speculation. However, the failure to disclose the comprehensive assessment limits the opportunity for proper scrutiny of these findings and diminishes the capacity to assess their significance in the decision-making process.

Moreover, there is evidence indicating that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite this recognition, these impacts have not been adequately integrated

into the main application nor given the appropriate weight they warrant. The withholding of the complete Social Impact Assessment obscures the genuine human and social costs associated with the development.

This lack of transparency directly undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is critical for developments of this magnitude, particularly when community character and function may be jeopardised. The absence of the full dataset results in an application that fails to present a complete evidential basis for weighing benefits against harm.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 concerning health and wellbeing. It is essential for developments to foster positive health outcomes and avert harm, yet the evidence available indicates existing adverse effects that remain undisclosed. Without the full assessment, it cannot be proven that the application complies with this policy.

The procedural implications are significant as well. The competent authority is unable to conduct a robust socio-economic and health evaluation without access to the entire Social Impact Assessment. This represents a material omission within the application and a failure to fulfil the evidential requirements of the Environmental Impact Assessment regime.

In conclusion, the non-disclosure of the complete Social Impact Assessment, combined with evidence of existing adverse impacts, renders the overall assessment incomplete and unreliable. This situation prevents a lawful determination and reinforces the assertion that the application lacks sufficient information to support its case.

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 create a continuous industrial presence, fundamentally changing this character and resulting in a permanent and irreversible transformation of the landscape. The assessment of seascape, landscape, and visual impacts is significantly lacking, failing to adequately reflect the scale of change or the sensitivity of the receiving environment.

The application does not accurately portray the magnitude of the visual impact. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, thereby affecting visual amenity and diminishing the qualities that define naturalness and remoteness. Furthermore, the assessment does not convey the true level of impact or its significance within such a sensitive landscape.

Methodological concerns arise regarding 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 the risk of understating the magnitude of the visual impact, thereby undermining the reliability of the assessment.

Additionally, the application fails to consider the interconnected relationship between landscape, seascape, and cultural heritage. Significant sites, such as the Calanais Standing Stones and other Scheduled Monuments, form part of a broader landscape setting linked to the Atlantic horizon. The assessment treats these assets in isolation, neglecting their interdependence, which results 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 only a visual impact but also a broader cultural and spatial harm that has not been adequately addressed within the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4, particularly regarding the protection of natural places and historic assets. The extent of change proposed is incompatible with the necessity to safeguard landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertion of policy compliance.

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal for construction and pollution risks lacks the necessary detail for a thorough evaluation of likely environmental effects. It involves significant seabed preparation and installation works in a high-energy Atlantic environment, yet fails to provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures to be established after consent, hindering any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures raises serious concerns due to the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment

mobilisation and accidental chemical or oil spills, it does not offer sufficient detail on how these risks will be prevented, controlled, or monitored.

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

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

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be assessed prior to consent, and the absence of this information means a lawful determination cannot be reached. Furthermore, the application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, detailed management plans, and the uncertainty surrounding potential impacts result in a materially deficient assessment. These deficiencies obstruct a robust evaluation of construction and pollution risks and reinforce the conclusion 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 application presents a significant challenge due to its fragmented assessment of onshore infrastructure, which is insufficient and does not account for the entirety of impacts associated with the integrated project. The offshore turbines and onshore works are interdependent, yet they are evaluated in isolation, leading to an incomplete understanding of the environmental and socio-economic consequences of the project.

Key onshore elements of the proposal encompass cabling that crosses protected moorland, the construction of a substation close to Stornoway, and the creation of access infrastructure that traverses sensitive landscapes. Notably, these activities involve excavation in areas of deep peat, especially within Barvas Moor, an important carbon store and ecologically significant habitat. The lack of a thorough assessment regarding these impacts results in an inadequate comprehension of the project's overall environmental footprint.

This omission of onshore impact assessments prevents a proper evaluation of cumulative effects, as the Environmental Impact Assessment process mandates that

all project components be considered collectively. The disjointed analysis of offshore and onshore elements obscures the understanding of combined impacts on peatlands, habitats, and local communities.

Additionally, there are substantial risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application fails to establish that impacts on these critical habitats have been thoroughly evaluated or that adequate avoidance measures have been incorporated. This situation leads to a significant evidential gap concerning biodiversity protection.

Concerns also arise around the project's carbon balance. The disruption of peatland can release sequestered carbon, which might create a carbon debt that contradicts the goals of renewable energy initiatives. The application does not sufficiently address this matter or confirm that the overall carbon balance remains advantageous.

Moreover, the planned routing of infrastructure through active croft land brings potential conflicts with existing land use and legal rights. The application lacks evidence that necessary consents or processes have been initiated, which raises questions regarding the feasibility and lawful execution of the project.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife represents a substantial oversight within the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are crucial to environmental quality, cultural identity, and tourism value. The proposed development would introduce permanent red aviation lighting that is visible over long distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering 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 oversight is particularly concerning given the significance of dark skies to the region's identity and the potential for growth in sectors like astro-tourism. The failure to consider these impacts creates a notable gap in the overall landscape and environmental assessment.

More alarmingly, there is a complete lack of evaluation regarding the effects on 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 increase the risk of collisions. The application does not include any assessment of lighting impacts or a phototaxis study, meaning it fails to evaluate how aviation lighting might affect these species or lead to increased mortality.

This issue is exacerbated by the reliance on daytime survey data within the ornithological assessment, which fails to account for nocturnal activities or the associated risks. Additionally, species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation due to artificial lighting, yet this risk remains unassessed. The absence of site-specific data related to night-time conditions leads to a critical void in understanding the ecological impacts.

Without an assessment of the nocturnal impacts, it remains 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 cannot be achieved, invoking the precautionary principle and inhibiting a lawful determination.

From a policy standpoint, this omission contradicts National Planning Framework 4 in terms of protecting natural areas and ensuring environmental quality. Furthermore, it undermines the wider evaluation of landscape and seascape impacts, as the character of night-time is a vital aspect of the environment.

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

TOURISM

The proposal under consideration overlooks the essential economic and social impacts on a vital sector of the Isle of Lewis economy, specifically tourism. This sector relies heavily on the area's wild coastline, nearly unblemished landscape, dark skies, and its inherent sense of remoteness. Although the application recognises 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, their behaviour, or the overall economic contribution of tourism.

Tourism on the island has seen remarkable growth, rising from £65 million in 2017 to over £81.5 million, and now supports more than 1,000 jobs, contributing up to 16% to the local economy. Nevertheless, the application neglects to model the potential effects of seascape industrialisation and the accompanying decline in environmental quality on Tourism Gross Value Added or the broader economic resilience of the area. Without this critical analysis, it remains impossible to ascertain whether the proposed development would yield a net economic benefit or jeopardise an established and

burgeoning sector.

Moreover, the assessment inadequately addresses the significance of environmental quality in underpinning tourism, including the necessity of unspoiled landscapes and dark skies for an enriching visitor experience. The exclusion of a Dark Skies Assessment exacerbates this shortcoming, creating a considerable void in understanding the impacts on a recognised and expanding part of the local economy. This is particularly pertinent for an island community characterised by limited economic diversification, where the lack of impact assessment on tourism extends to 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 evaluated as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application fails to substantiate compliance with National Planning Framework 4, particularly concerning economic impact and the necessity to demonstrate a net benefit. Additionally, it contradicts strategic objectives that designate tourism as a priority growth sector, lacking the necessary evidence for the competent authority to evaluate the economic ramifications of the proposal.

In summary, the collective failures to quantify tourism impacts, evaluate environmental factors influencing visitor behaviour, and recognise the economic dependency of the island culminate in a significant evidential gap. This gap hinders a thorough assessment of the economic effects and reinforces the conclusion that the application remains incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the requirements of sustainable development according to statutory duties and national policy. The core issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, primarily concerning unacceptable industrialisation, have not been adequately addressed, despite the application being presented under a framework that places increased importance on biodiversity, peatland protection, and community wellbeing.

The evidential basis for determining this application is neither complete nor reliable. There are significant gaps in baseline data and a reliance on a design envelope that remains undefined. Mitigation measures are not specified, and critical impact pathways, such as those affecting nocturnal wildlife, onshore infrastructure, and tourism, have been omitted. As a result, the Environmental Impact Assessment is incomplete and does not allow for a thorough understanding of potential significant effects or residual impacts.

Procedural deficiencies are also evident. The lack of a compliant Island Communities Impact Assessment breaches the statutory duties outlined in the Islands (Scotland) Act 2018, and the failure to disclose the full Social Impact Assessment is a notable omission. These issues hinder the competent authority's ability to evaluate impacts on

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

Furthermore, the proposal contradicts the National Planning Framework 4, failing to demonstrate biodiversity protection, acceptable health and wellbeing impacts, or net economic benefits, as there is no tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore elements has not been adequately conducted, leaving unclear effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. The assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and internally inconsistent. The required evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been met, which necessitates the application of the precautionary principle and prevents a lawful conclusion that impacts are acceptable.

The proposal would also induce substantial and irreversible changes to a sensitive landscape. The industrialisation of the Atlantic-facing coastline, along with the loss of dark skies, disruption to cultural and visual relationships, and negative impacts on tourism, presents permanent effects that cannot be mitigated to an acceptable level.

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

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

Additional Comments

I was brought up in the Westside of Lewis. Although I don't live there currently, I plan to return one day.
I think the planned large scale industrialisation of our unique island is disgusting. It is a short term cash grab which will have negative long term consequences. Our unique peaceful atmosphere and dark skies will be a thing of the past. Our untainted views will be gone and replaced by monstrous structures. Our wonderful diverse wildlife will be harmed.
Our roads and infrastructure will be trampled over by trucks and machinery and outsiders who have no appreciation for our area.
Wee passionately so not want this. At will derive minimal benefit from it beyond a short term cash boost which will quickly disappear. The effects of this ugly blight will remain forever and will kill off what makes our island so special.
Please go and leave our island unharmed.

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: 94F4EFB1

Member of the public 1405

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

Dear Sir/Madam

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The proposal is supported by an Environmental Impact Assessment Report that is materially deficient and does not present a comprehensive, transparent, or dependable account of the likely environmental effects. The reliance on a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations, introduces significant uncertainty. This approach obstructs a

consistent application of a worst-case scenario, undermining the integrity of the assessment and preventing both the public and the competent authority from grasping the true extent of environmental effects.

Additionally, the application depends heavily on undefined mitigation measures, monitoring strategies, and management plans. This means that consent is being sought on the basis that any potential environmental harm will be addressed at a later stage, hindering a meaningful evaluation of effectiveness or assessment of residual impacts. The deferral of crucial information to post-consent stages is procedurally unacceptable and contradicts the purpose of the Environmental Impact Assessment regime, which necessitates that significant effects and mitigation strategies be clearly established prior to determination.

The report also suffers from significant evidential deficiencies, including gaps in baseline data, methodological limitations, and an over-reliance on assumptions instead of site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, especially where negligible or non-significant effects are asserted without robust supporting data. The lack of adequate information prevents a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory requirements.

As a result, the application does not meet the evidential threshold required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, particularly in relation to 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 demonstrated that impacts have been fully assessed or that appropriate safeguards are in place.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is fundamentally flawed, notably neglecting the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are interconnected. Rather than recognising heritage as a living element that serves ongoing social, cultural, and spiritual purposes within the community, the application presents it as a collection of isolated, static assets.

There is a critical shortcoming in the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are active locations for burial

and spiritual practices, yet the assessment views them merely as static features. This oversight fails to consider their continued use and meaning, as well as the potential impact of development on their settings. Consequently, the evaluation of cultural effects remains incomplete and overlooks their importance to community life.

Moreover, the application neglects to address intangible cultural heritage elements, including the Gaelic language and traditions, which are central to the identity of the area. The long-standing relationship between the community and the coastal environment is completely disregarded in the assessment, representing a major omission. Without these considerations, the cultural implications of the development cannot be accurately understood.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population possesses a unique cultural identity akin to that of an Indigenous People, yet no process of Free, Prior and Informed Consent has been pursued. The lack of meaningful engagement calls into question the legitimacy of the assessment and fails to adhere to established principles of participation in decisions impacting cultural and environmental interests.

Furthermore, there is a critical procedural oversight in the absence of a compliant Island Communities Impact Assessment, as mandated by the Islands (Scotland) Act 2018. This omission prevents the competent authority from meeting its legal obligation to evaluate the social, cultural, and economic impacts on the island community, thus hindering a lawful determination.

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

In summary, the failure to assess living heritage, intangible cultural values, community rights, and statutory obligations has resulted in a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, leaving the application insufficient for determining the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's commissioned Social Impact Assessment, which included focus groups with local residents, has not been fully disclosed. This non-disclosure creates a significant evidential gap, hindering both public understanding and the competent authority's ability to assess the full extent of social risks identified in the developer’s own research.

Available summaries indicate that residents are currently facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts have been confirmed through direct engagement rather than speculation.

However, the failure to provide the complete assessment stifles proper scrutiny of the findings and limits 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” highlighted in the developer's own findings. Despite the acknowledgment of these impacts, they have not been adequately incorporated into the main application or afforded appropriate consideration. The lack of transparency surrounding the full Social Impact Assessment obscures the true human and social costs associated with the development.

This deficiency in transparency undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health impacts is imperative for developments of this magnitude, particularly when community character and functioning may be jeopardised. By withholding the full dataset, the application does not provide a complete evidential basis for weighing the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments are required to promote positive health outcomes and mitigate harm; however, the evidence currently available reveals existing adverse effects that have not been fully articulated. Without the complete assessment, compliance with this policy remains unproven.

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

In summary, the failure to disclose the complete Social Impact Assessment, coupled with evidence of existing adverse impacts, renders the assessment insufficient and unreliable. This situation impedes lawful determination and supports the assertion that the application lacks the necessary information for adequate evaluation.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The application presents significant deficiencies in its assessment of seascape, landscape, and visual impacts. It fails to accurately reflect the scale of change and the sensitivity of the West Lewis coastline, characterised by its open Atlantic horizon and undeveloped character. The introduction of large-scale turbines near the shoreline would establish a continuous and dominant industrial presence, fundamentally transforming this landscape and resulting in a permanent alteration of its character.

Moreover, the magnitude of visual change is not adequately represented. The scale and proximity of the turbines would dominate views from residential areas, historic sites,

and frequently visited coastal locations, thereby directly impacting visual amenity and eroding the essential qualities of naturalness and remoteness. The assessment lacks a proper conveyance of this level of impact or its significance, given the sensitivity of the landscape.

Methodological issues further exacerbate the assessment's shortcomings, particularly regarding the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints do not sufficiently represent the most sensitive receptors or the 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, compromising the reliability of the assessment.

Additionally, the application neglects to assess the interconnectedness of landscape, seascape, and cultural heritage adequately. Notably, significant sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting connected by visual and spatial relationships to the Atlantic horizon. The assessment treats these heritage assets as isolated, failing to recognise 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 relationships, changing the context in which heritage assets are perceived and severing their link to the natural horizon. This constitutes not only a visual impact but also a broader cultural and spatial harm that the application has not sufficiently assessed.

From a policy standpoint, the proposal contradicts National Planning Framework 4, which emphasises the need to protect natural places and historic assets. The extent of the proposed changes is at odds with the requirement to safeguard landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further undermines any assertion of policy compliance.

It is evident that the impacts identified cannot be effectively mitigated. The scale, height, and proximity of the turbines would result in a dominant and unavoidable presence. Therefore, the resulting changes are fundamentally permanent and cannot be reduced to an acceptable level through mitigation efforts.

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

DARK SKIES AND NOCTURNAL WILDLIFE

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

exceptionally dark skies. These dark skies are important for environmental quality, cultural identity, and tourism value.

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

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

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

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

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

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

TOURISM

The assessment of tourism impacts is notably inadequate, lacking a thorough evaluation of the economic and social effects on a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and overall sense of remoteness. Although the application acknowledges that 86% of visitors are attracted by the scenery, it does not provide any quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the total economic contribution.

Significant growth in tourism has been observed, with revenue rising from £65 million in 2017 to over £81.5 million, facilitating more than 1,000 jobs and representing up to 16% of the island's economy. Nonetheless, the application neglects to model the potential impacts of seascape industrialisation and the degradation of environmental quality on Tourism Gross Value Added and broader economic resilience. Without this crucial analysis, it remains unclear whether the development would yield a net economic benefit or adversely affect a well-established and expanding sector.

Furthermore, the assessment does not acknowledge the critical role that environmental quality plays in tourism, such as the significance of unspoiled landscapes and dark skies for enhancing visitor experiences and catering to emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a notable gap in understanding the potential impacts on a recognised and growing segment of the local economy.

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

From a policy perspective, the application does not demonstrate compliance with the National Planning Framework 4, particularly concerning economic impact and the necessity of proving net benefit. Additionally, it contradicts strategic objectives that recognise tourism as a priority growth sector and fails to provide adequate evidence for the competent authority to assess the economic repercussions of the proposal.

In summary, the lack of quantification of tourism impacts, failure to evaluate environmental factors influencing visitor behaviour, and disregard for the economic dependency of the island culminate in a significant evidential gap. This hinders a comprehensive assessment of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally inadequate in meeting the criteria for sustainable development as set forth by statutory obligations, national policy, and evidential standards. It echoes the principal concerns that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. This current proposal, despite being under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, fails to address these critical issues.

Furthermore, the application lacks a comprehensive and reliable evidential foundation for assessment. It presents significant deficiencies in baseline data, continues to utilise an undefined design envelope, relies on unspecified mitigation measures, and neglects

to consider important impact pathways related to nocturnal wildlife, the full scope of onshore infrastructure, and tourism implications. Consequently, the Environmental Impact Assessment is incomplete, inhibiting a thorough understanding of the potential significant effects and residual impacts.

Procedural errors are also evident. The failure to provide a compliant Island Communities Impact Assessment constitutes a breach of statutory duty as mandated by the Islands (Scotland) Act 2018. Additionally, the omission of a complete Social Impact Assessment presents a material shortfall, obstructing the competent authority's ability to evaluate effects on community wellbeing, cultural identity, and economic resilience. These shortcomings render the application unfit for consideration.

The proposal contravenes the National Planning Framework 4 by not sufficiently demonstrating the protection of biodiversity, natural sites, and cultural heritage. It does not adequately assess health and wellbeing impacts and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative impacts of both offshore and onshore components have not been thoroughly evaluated, leaving potential effects on peatlands, carbon balance, habitats, and crofting land obscured.

Environmental risks associated with the proposal are uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The necessary evidential threshold to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and obstructing a lawful conclusion regarding acceptable impacts.

Moreover, the proposal would 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 connections, and effects on tourism are permanent changes that cannot be mitigated to a satisfactory degree.

In summary, this application is procedurally and substantively unfit for determination. The multitude of information gaps, coupled with conflicts in policy and unresolved environmental uncertainties, impede a lawful and evidence-based decision. The competent authority must reject this application outright or utilise the applicable regulatory measures to require the submission of the necessary information.

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

Additional Comments

Born and brought up in Melbost Borve in the parish ofBarvas I visit three or four times a year and always bring friends to enjoy the spectacular seascapes I strongly object to the wind farms as they will obstruct the views and endanger those I love who live near them

particularly in Dalbeg Please stop this from going ahead
Thank you

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: A82F3A03

Member of the public 1406

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 regulations. The objection arises from a thorough review of the Environmental Impact Assessment Report and accompanying documentation, highlighting significant deficiencies in planning, environmental considerations, cultural implications, and procedural adherence. 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 rich cultural identity. The proposal's scale, design, and proximity to the shoreline raise serious concerns about its alignment with statutory requirements, national policies, and sustainable development principles.

The application lacks a solid evidential foundation for a lawful determination. There is critical missing environmental data, with limited and inconsistent baseline information, leaving many key elements of the proposal undefined. The use of a flexible design framework obscures the understanding of potential significant effects, and without specific mitigation measures outlined, it is impossible to assess their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidence.

Moreover, there are substantial conflicts with existing policy frameworks. The proposal is at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health and wellbeing. It does not demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts directly impact the statutory tests necessary for consent, compromising the authority's ability to determine that the development aligns with policy standards.

Unprecedented in scale for this location, the proposal features large turbines situated in close proximity to the shoreline, raising considerable concerns about landscape capacity, visual impact, and environmental ramifications. In light of the insufficient information provided, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy violations, it is evident that the application is incomplete and unfit for a lawful determination. Therefore, the precautionary principle must be invoked in this case.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate and does not offer a comprehensive or dependable account of the potential environmental effects associated with the proposal. The application's reliance on a flexible Project Design Envelope, which lacks specific commitments to turbine dimensions, layouts, or configurations, introduces significant uncertainty. This ambiguity undermines the assessment's integrity and may lead to a misrepresentation of the actual impacts of the development, thereby hindering both public understanding and the competent authority's ability to gauge the true extent of the environmental consequences.

Furthermore, the application places considerable emphasis on unestablished mitigation measures, monitoring strategies, and management plans. Seeking consent under the assumption that environmental harm will be resolved later obstructs meaningful evaluation of these measures' effectiveness and the assessment of residual impacts. This deferral of crucial information to post-consent stages contravenes the intended purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies are clearly delineated before any determination is made.

Additionally, the report exhibits serious evidential shortcomings, including insufficient baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. Such deficiencies result in uncertainty regarding the scale and significance of the impacts, particularly where negligible or non-significant effects are asserted without robust supporting evidence. The lack of adequate information hampers a thorough understanding of cumulative and worst-case impacts, generating scientific uncertainty that fails to align with statutory requirements.

Consequently, the application does not satisfy the evidential threshold mandated by the Habitats Regulations, as it does not eliminate adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. The proposal also does not demonstrate adherence to National Planning Framework 4, including standards related to biodiversity protection and environmental integrity, since it cannot prove that impacts have been comprehensively assessed or that suitable safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

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

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The 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 presents significant concerns regarding its ornithological assessment, which is fundamentally flawed and lacks vital evidence. It asserts that the development will not adversely affect the internationally important seabird populations on the west coast of the Isle of Lewis, where many species are already in decline. However, it fails to meet the evidential standard required to support this claim, particularly in relation to key foraging areas and migratory pathways that the project encroaches upon. There is insufficient analysis of the risks associated with displacement, collision, and habitat loss for these vulnerable species.

A troubling contradiction arises within the application, as it claims no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation, a process only necessary when significant harm is anticipated. This inconsistency casts doubt on the credibility of the assessment and suggests that the findings are not backed by solid evidence. Moreover, it does not adequately demonstrate that seabirds linked to protected sites like the Lewis Peatlands and St Kilda will remain unaffected, overlooking the critical importance of these feeding grounds. The reliance on modelling techniques further complicates matters, especially for species facing severe

population declines, such as Kittiwakes and Fulmars. It is likely that the methodologies employed underestimate mortality rates, particularly when baseline data is lacking and the behavioural responses of these species are not thoroughly understood.

The siting of turbines within a recognised migratory corridor poses an additional and grave 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 assess the long-term consequences of sustained mortality in this corridor or the potential repercussions for species with small global populations.

From a regulatory standpoint, the application does not satisfy the evidential threshold necessary to affirm no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, alongside data deficiencies and modelling constraints, indicates that the standard of beyond reasonable scientific doubt has not been reached. This necessitates the application of the precautionary principle, which, in turn, obstructs a lawful decision in favour of consent.

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

In conclusion, the assessment is rendered unreliable due to its internal inconsistencies, methodological flaws, and lack of sufficient evidence. These shortcomings hinder a thorough evaluation of the potential impacts and contribute to the overall finding that the application fails to meet the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposal critically underestimates the assessment of cultural heritage and community identity, failing to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. It adopts a simplistic approach, viewing heritage merely as isolated, static assets rather than acknowledging their ongoing social, cultural, and spiritual relevance within the community.

Particularly troubling is the inadequate treatment of significant cultural sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These are not just static features; they are vital spaces for burial and spiritual practice. However, the assessment neglects to consider their continued use and meaning, as well as the development's potential impact on their surrounding environment. This failure leads to an incomplete understanding of cultural effects and dismisses their importance to community life.

Moreover, the application overlooks intangible cultural heritage, including the Gaelic language, various traditions, and the enduring relationship between the community and

the coastal environment. These elements are integral to the area's identity and are entirely omitted from the assessment, representing a critical gap. Without accounting for these factors, the cultural ramifications of the development remain inadequately explored.

Concerns also arise around community rights and the necessity for engagement. The Gaelic-speaking population embodies a unique cultural identity with recognised traits of an Indigenous People, yet no process of Free, Prior and Informed Consent has been conducted. This lack of genuine engagement diminishes the credibility of the assessment and fails to adhere to established principles regarding participation in decisions that affect cultural and environmental matters.

Additionally, the absence of a compliant Island Communities Impact Assessment is a major procedural shortcoming, as mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission in itself precludes a lawful determination.

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

In summary, the neglect to evaluate living heritage, intangible cultural value, community rights, and statutory responsibilities results in a substantial evidential gap. The cultural impacts of the development have not been thoroughly assessed, and the application fails to deliver a solid foundation for understanding the true cultural cost associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer has commissioned a Social Impact Assessment, which included focus groups with local residents. However, the full report has not been published, leading to a significant evidential gap that obstructs both public understanding and the competent authority's evaluation of the social risks identified by the developer's own research. Available summaries reveal that residents are already suffering measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement and are therefore not speculative. Nonetheless, the lack of full disclosure limits proper scrutiny of the findings and hinders the assessment of their significance in the decision-making process.

Moreover, evidence suggests that the proposal is perceived as a direct threat to community identity and cohesion, with “cultural loss” highlighted within the developer’s findings. Despite this, these impacts have not been adequately integrated into the main application or given the necessary weight. The failure to disclose the complete 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 comprehensive understanding of social, economic, and health impacts is vital for developments of this magnitude, particularly when community character and functioning are at stake. By withholding the full dataset, the application does not provide a complete evidential basis to weigh the balance between benefits and harm.

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

The procedural implications are considerable. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This omission represents a material failure to meet the evidential requirements of the Environmental Impact Assessment regime.

Collectively, the non-disclosure of the full Social Impact Assessment, along with evidence of existing adverse impacts, results in an incomplete and unreliable assessment. This situation prevents a lawful determination and reinforces the conclusion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, seascape, and landscape is significantly lacking and does not adequately portray the sensitivity of the receiving environment or the scale of change involved. The coastline of West Lewis is characterised by an expansive Atlantic horizon, an undeveloped nature, and a pronounced sense of remoteness. The proposed introduction of large-scale turbines situated close to the shoreline would establish a continuous industrial presence, fundamentally altering this character and leading to a permanent transformation of the landscape.

The application fails to properly convey the magnitude of visual change associated with the turbines. Their scale and proximity would dominate the 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 does not sufficiently communicate the significance of this impact within the context of such a sensitive landscape.

Concerns also arise from the selection and presentation of visual viewpoints within the assessment. Evidence indicates that the chosen viewpoints may not adequately reflect the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This situation raises the possibility that the visual impact has been underestimated, thereby compromising the reliability of the overall assessment.

Additionally, the assessment neglects to consider the interconnected relationship between landscape, seascape, and cultural heritage. Key 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 cultural assets in isolation rather than acknowledging their interdependence, which leads to an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, changing the context in which heritage assets are perceived and severing their connection to the natural horizon. This presents not just a visual impact but a wider cultural and spatial detriment that has not been adequately addressed in the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4 regarding the safeguarding of natural spaces and historical assets. The extent of change proposed is inconsistent with the need to protect landscape character, visual amenity, and the settings of culturally important sites. The lack of a comprehensive worst-case scenario analysis further weakens any assertion of compliance with policy requirements.

It is also evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelming and inescapable. The resulting change is therefore fundamentally permanent, rather than something that could 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 interconnected nature of landscape and heritage. These shortcomings inhibit a reliable evaluation and strengthen the conclusion that the proposal is incompatible with the preservation 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 evaluate the likely environmental effects. Notably, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans, as the application relies on undefined future mitigation and contingency measures to be prepared after consent. This approach raises serious concerns, particularly given the sensitivity of the West Lewis coastline, which supports clean coastal waters and important habitats that are vulnerable to sediment disturbance and contamination.

While the application acknowledges risks associated with sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on how these incidents 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 consequences of these impacts. This uncertainty extends to potential effects on marine species and habitats that have already been identified as sensitive in the wider assessment.

The absence of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent is granted, the application undermines the competent authority's ability to assess whether sufficient safeguards are in place to respond to pollution events. This introduces procedural risk and raises significant concerns regarding environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation strategies are evaluated prior to consent, and the lack of such information means that a lawful determination cannot be made. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The proposal raises significant concerns regarding the assessment of marine life and fisheries. The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry. However, the application does not adequately demonstrate how these vital habitats and uses can be safeguarded from disruption.

A major flaw in the application is the assumption that fishing activities can be shifted without negative consequences. There is no evidence presented that alternative fishing grounds exist or that they can support the pressure from displaced activities. This is a crucial gap, as such displacement may lead to overfishing in other areas, potentially impacting the local fishing fleet's economic viability. Without a thorough assessment based on evidence, understanding the implications for fisheries and local livelihoods remains incomplete.

Furthermore, the proposal poses significant risks to marine species, particularly due to the underwater noise from construction activities. The use of high-energy hammer piling for an extended period is likely to disturb marine life over considerable distances, which could affect species like dolphins. The anticipated disturbance to a large portion of the local bottlenose dolphin population is concerning, yet the application appears to minimise these effects without adequate supporting evidence.

There is also a troubling inconsistency within the application. While it acknowledges the need for licenses to allow harm to European Protected Species, it simultaneously describes these impacts as negligible. This contradiction questions the credibility of the assessment and raises compliance issues with the Habitats Regulations, especially in cases where harm necessitates legal approval.

The assessment neglects to consider cumulative impacts that arise from various pressures, including noise, habitat disturbance, and the displacement of fishing activities. Without a detailed evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

In terms of policy compliance, the application does not align with the National Planning Framework 4 or the National Marine Plan. It fails to demonstrate that the development can coexist with current marine users or prevent unacceptable impacts on marine biodiversity, which obstructs any conclusion that the proposal is sustainable.

Overall, the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the presence of internal inconsistencies render the assessment incomplete and unreliable. These issues hinder any robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal raises significant concerns regarding the carbon balance due to the disturbance of peatland, which releases stored carbon and potentially leads to a carbon debt. This situation contradicts the aims of renewable energy development. The application does not sufficiently address this matter or provide evidence that the overall carbon balance remains advantageous.

Moreover, the routing of infrastructure through active croft land presents potential conflicts with existing land use and legal rights. The application lacks evidence that the necessary consents or processes have been initiated, thereby questioning the deliverability and lawful implementation of the project.

The onshore elements of the project include cabling across protected moorland, construction of a substation near Stornoway, and associated access infrastructure through sensitive landscapes. These works involve excavation in areas of deep peat, notably within Barvas Moor, which serves as a significant carbon store and is an ecologically sensitive habitat. However, the application does not offer a comprehensive assessment of these impacts, limiting the understanding of the project's overall environmental footprint.

There are substantial risks to sensitive habitats, such as machair systems and peatland environments, which are subject to policy protection. The application fails to demonstrate that the impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been implemented. This creates a clear

evidential gap in terms of biodiversity protection.

The assessment of onshore infrastructure is materially incomplete, failing to account for the full extent of impacts arising from what constitutes a single integrated project. The offshore turbines and onshore works are intrinsically linked yet are evaluated separately. This fragmented approach obscures the true scale of environmental and socio-economic effects.

By excluding or deferring assessment of onshore impacts, the application impedes the 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 results in a failure to fully understand the combined impacts on peatlands, habitats, and local communities.

From a policy perspective, the lack of a holistic assessment of the project and the failure to demonstrate protection of peatlands, habitats, and land use interests are 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, absence of a comprehensive assessment, and lack of evidence regarding environmental and land use impacts render this portion of the application incomplete and unreliable, thus preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment concerning dark skies and nocturnal wildlife in the Environmental Impact Assessment represents a significant omission. The proposal to introduce permanent red aviation lighting has the potential to create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment of the West Lewis coastline, an area noted for its exceptionally dark skies, which contribute to its environmental quality, cultural identity, and tourism value.

Moreover, the application neglects to evaluate the impacts of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This oversight is particularly concerning given the growing importance of dark skies to local identity and emerging tourism sectors, such as astro-tourism. The failure to adequately consider these factors creates a significant gap in the overall landscape and environmental assessment.

Of even greater concern is the lack of evaluation regarding the impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel exhibit sensitivity to artificial lighting due to phototaxis, which can cause disorientation and increase the risk of collisions. The application does not present any lighting impact assessment or phototaxis study, leading to an inability to assess how aviation lighting may impact these species or contribute to increased mortality rates.

Additionally, the ornithological assessment's reliance on daytime survey data fails to address nocturnal activity or associated risks. Other species, such as Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting. The lack of site-specific night-time data represents a critical gap in understanding ecological impacts.

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

From a policy standpoint, these omissions are in conflict with National Planning Framework 4, particularly concerning the protection of natural places and environmental quality. This oversight further undermines the comprehensive assessment of landscape and seascape impacts, as the character of night-time environments is an integral element of the overall ecological framework.

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

TOURISM

The evaluation of tourism impacts associated with the proposal is severely lacking and does not adequately address the economic and social implications for a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the area's stunning wild coastline, near-pristine landscapes, dark skies, and a distinct sense of remoteness. The application acknowledges that 86% of visitors are attracted by the scenery, yet it fails to provide a quantified analysis of how the introduction of large-scale offshore infrastructure would influence visitor numbers, behaviour, or the overall economic contribution of the tourism sector.

The significance of tourism has been notable, with revenue increasing from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and represents up to 16% of the island’s economy. However, the application does not evaluate how the proposed industrialisation of the seascape and the consequent loss of environmental quality might affect Tourism Gross Value Added or the broader economic resilience of the area. Without this critical analysis, it remains uncertain whether the development would provide a net economic benefit or potentially harm a sector that is both established and growing.

Moreover, the assessment overlooks the crucial role of environmental quality in sustaining tourism, particularly the significance of unspoiled landscapes and dark skies for enhancing visitor experiences and supporting burgeoning markets such as nature-

based tourism and astro-tourism. The lack of a Dark Skies Assessment further highlights this shortcoming, resulting in a considerable gap in understanding the impacts on an acknowledged and expanding segment of the local economy.

In an island community that has limited economic diversification, the negligence in evaluating tourism impacts has broader ramifications for employment, local businesses, and overall community sustainability. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been properly examined as stipulated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly concerning economic impact and the necessity to illustrate a net benefit. It also contradicts strategic objectives that classify tourism as a priority growth sector and lacks adequate evidence for the competent authority to assess the economic repercussions of the proposal.

In summary, the combination of inadequate quantification of tourism impacts, insufficient assessment of environmental factors influencing visitor behaviour, and disregard for the island's economic dependence culminates in a significant evidential gap. This prevents a thorough evaluation of the economic effects and supports the argument that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm raises significant concerns regarding compliance with sustainable development principles, as mandated by statutory obligations, national policy, and evidential requirements. The application mirrors the fundamental issues that led to the previous rejection of the Lewis Wind Power proposal in 2008, highlighting the unacceptable scale of industrialisation. This current proposal is presented within a more robust policy environment that emphasises the importance of biodiversity, peatland conservation, landscape preservation, and community health.

There are substantial deficiencies within the application that undermine its evidential basis for determination. Specifically, the lack of comprehensive baseline data, the ongoing use of an undefined design envelope, and reliance on unspecified mitigation measures all contribute to a flawed assessment. Additionally, the failure to account for key impact pathways, such as effects on nocturnal wildlife, the full extent of onshore infrastructure, and potential impacts on tourism, renders the Environmental Impact Assessment incomplete. As a result, the likely significant effects and residual impacts remain poorly understood.

Furthermore, procedural inadequacies are evident in the application. The omission of a compliant Island Communities Impact Assessment breaches the statutory duty imposed by the Islands (Scotland) Act 2018. Additionally, the failure to provide the full Social Impact Assessment constitutes a material shortcoming. Such lapses inhibit the competent authority's ability to evaluate the implications for community wellbeing,

cultural identity, and economic resilience, thus rendering the application unsuitable for consideration.

Conflicts with National Planning Framework 4 are clear, as the proposal fails to adequately protect biodiversity, natural environments, and cultural heritage. It does not demonstrate acceptable health and wellbeing impacts and lacks evidence of a net economic benefit due to the absence of modelling related to tourism impacts. Moreover, the cumulative effects of both offshore and onshore components have not been thoroughly assessed, leading to a lack of clarity regarding impacts on peatlands, carbon balance, habitats, and agricultural land.

Uncertainties persist regarding environmental risks, which could be significant. Assessments pertaining to marine ecology, seabird populations, protected species, and marine mammals remain incomplete and occasionally contradictory. The evidential threshold necessary to eliminate the possibility of adverse effects beyond reasonable scientific doubt has not been achieved, which invokes the precautionary principle and hinders a lawful assessment of impact acceptability.

The proposal would bring about considerable and irreversible alterations to a notably sensitive landscape. The industrial development of the coastline facing the Atlantic, the erosion of dark skies, the disruption of cultural and visual connections, and adverse effects on tourism all signify permanent changes that cannot be adequately mitigated.

In conclusion, the application stands as both procedurally and substantively inadequate for determination. The extensive information gaps, coupled with conflicts with policy and unresolved environmental concerns, hinder the possibility of a lawful, evidence-based decision. The competent authority is urged to refuse consent based on these grounds or to invoke relevant regulatory provisions to demand the submission of necessary information.

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

Additional Comments

As a resident of Arnol (HS2 9DB) to lodge a formal objection to the proposed Spiorad na Mara Offshore Wind Farm, and I object in the strongest possible terms.

I was born and brought up in this very house at 1 Arnol, which has been my family home for over 100 years. I later moved to Glasgow and returned home 10 years ago to bring up my children in the peaceful surroundings of the west coast of Lewis.

This place is not just an address to me: it is a long-standing family home, my children’s home, my daily outlook, and the quiet coastal environment that we rely on for peace, rest and wellbeing. The proposal would bring an industrial presence into the seascape we live beside, creating a permanent change that I do not accept as compatible with a settled community on the west coast of Lewis.

1) Residential amenity and wellbeing (Arnol, HS2 9DB)
My home and garden are at 1 Arnol (HS2 9DB). This has been my family home for over 100 years, and it is where I was born and brought up. I have now returned permanently, and I am raising my children here because of the peace, safety and natural surroundings.

My elderly mother is also here. She is largely housebound, and her garden is the one place where she can still spend time outside and feel some independence. She tends the plants and pots through the seasons and then sits with a cup of tea taking in the open coastal outlook—the changing light on the water, the sound of the wind and sea, and the birds passing overhead. That quiet, natural view is not a luxury for her; it is one of the few remaining sources of calm and enjoyment in her day, and it plays an important part in her wellbeing. The prospect of that outlook being permanently altered by an industrial-scale development—both in daylight and through night-time warning lights—deeply concerns me. For someone who cannot easily get out and about, losing a peaceful, restorative view is not a minor inconvenience; it would be a real reduction in quality of life.

A large part of our day-to-day life happens outdoors—stepping outside for fresh air, hearing the sea and the wind, and having an open horizon rather than built development in front of us. We make regular use of the coastline as part of ordinary family life: fishing in the sea lochs with my children, wild swimming, and visiting the beach on a daily basis. For me personally, these daily visits are also an important way to manage stress and maintain wellbeing.

The thought of this familiar seascape being dominated by a turbine array and night-time warning lights is deeply upsetting. It would materially reduce the quiet enjoyment of my home and undermine the peace and restorative quality of the places we use every day.

2) Seascape/visual effects and dark skies
The west coast of Lewis is valued for its open horizons, natural coastline and dark skies. That matters in a very real way to those of us who live here: the nights are genuinely dark, the stars are visible, and the coast feels calm and unspoilt—especially when spending time at the beach in the evening. On clear nights we are often able to see the Northern Lights, and that experience depends on a dark, natural night-time environment. A development of this scale would industrialise the seascape and erode the wild, undeveloped character of the coast.

I object in particular to the likely night-time impacts: any requirement for aviation/marine safety lighting would introduce prominent, repetitive flashing lights into an otherwise dark coastal environment. These lights would be visible from homes and from widely used viewpoints, and would create an ongoing, unavoidable disturbance that changes the character of the area at night. In my view, that would severely diminish the dark-sky qualities that residents value and rely upon. This harm is not something that can be meaningfully “mitigated” for residents who must live with the effects every day.

3) Noise (including low-frequency noise)
I object due to the risk of operational noise impacts, including low-frequency noise, leading to sleep disturbance and stress for residents. Given the scale of the project and the sensitivity of the coastal environment, I do not accept that modelling and conditions alone can guarantee that nearby communities will not experience harmful effects. Where there is a credible risk of significant adverse impact on people in their homes, the appropriate decision is to refuse the proposal.

4) Wildlife impacts and inadequate Environmental Impact Assessment
Wildlife is part of everyday life at 1 Arnol, and a key part of what my family and I value about living here. We see a wide variety of birds typical of the Western Isles, including geese and swans, and we also see birds of prey, including sea eagles. I am also concerned about protected species in the wider area such as the corncrake. Being able to see and share this wildlife with my children—often during our daily time at the beach and along the coast—is a meaningful part of family life and wellbeing here, and I do not accept the risk of that being diminished by an industrial-scale offshore development.

I have deep concerns that a development of this scale offshore of Lewis could cause significant adverse impacts on wildlife through collision risk, displacement and barrier effects for seabirds and migratory birds, disturbance during construction, and wider impacts on the marine environment. While the applicant has submitted an Environmental Impact Assessment Report (including ornithology and collision risk modelling), I am not satisfied that it demonstrates the risk to wildlife—particularly to vulnerable and protected species—is acceptable, or that uncertainty has been treated with the level of precaution that the public would reasonably expect for a development of this magnitude. On that basis, I believe the application should be refused.

5) Property value and economic harm to households
I object because the permanent loss of amenity and the change in character of the area (including night-time lighting and visual intrusion) is likely to reduce the market attractiveness and value of nearby homes, creating financial harm for households that have invested their savings in living here. There is no realistic way for individual residents to avoid or offset these losses once consent is granted and construction begins, which reinforces why the application should be refused.

Request
For the reasons set out above—including unacceptable harm to residential amenity, dark skies and seascape character, and my serious concerns regarding impacts on wildlife and the adequacy of the Environmental Impact Assessment—I ask that consent and associated marine licences for the Spiorad na Mara Offshore Wind Farm.

If the consenting authority is nevertheless minded to approve the proposal, I request that I am notified and given a meaningful opportunity to comment on any final Environmental Impact Assessment material, proposed conditions, and the final lighting/noise management approach before any decision is issued.

Cumulative effects

I also object on the basis of cumulative and in-combination impacts with other offshore/onshore developments (including other ScotWind projects and any associated grid/onshore transmission works). The combined effect would accelerate the industrialisation of the west coast seascape, intensify night-time lighting impacts, and increase the overall burden on residents' amenity and wellbeing. These cumulative harms further support refusal.
Please confirm receipt of this objection and ensure it is fully taken into account in the determination of the applications. For my family, this is not an abstract planning matter: it concerns our home of more than a century, the place where I was raised, and the coastal environment I returned to so my children could grow up with the same peace and connection to nature. I am deeply worried about the permanent loss of that peace—of dark nights, quiet shorelines and the simple daily refuge of the beach—and I urge you to refuse the application. Please keep me informed of all key stages and any decision issued.

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: A6A334A1

Member of the public 1407

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 effects of the proposal. Central to these issues is the reliance on a flexible Project Design Envelope, which lacks firm commitments to specific turbine dimensions, layouts, or configurations. This introduces substantial uncertainty and obstructs the consistent application of a worst-case scenario. Consequently, the impacts disclosed may not accurately represent the final development, thereby hindering both public understanding and the competent authority's ability to comprehend the true extent of environmental effects.

Moreover, the application is heavily contingent upon yet-to-be-defined mitigation measures, monitoring strategies, and management plans. This approach seeks consent on the premise that any environmental harm will be addressed post-consent, which compromises the opportunity for meaningful evaluation of effectiveness and an assessment of residual impacts. Such deferral of crucial information to stages following consent contradicts the Environmental Impact Assessment regime's intention, which mandates that significant effects and mitigation strategies are established clearly prior to determination.

Further exacerbating the situation are notable evidential deficiencies, including incomplete baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This results in uncertainty regarding the scale and significance of the impacts, especially where conclusions regarding negligible or non-significant effects are made without robust supporting evidence. The lack of sufficient information obstructs a comprehensive understanding of cumulative and worst-case impacts and introduces scientific uncertainty incompatible with statutory requirements.

As a result, the application does not meet the evidential threshold stipulated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This scenario activates the precautionary principle, particularly concerning protected species and sensitive habitats. The proposal also fails to adhere to the National Planning Framework 4, particularly in terms of biodiversity protection and environmental integrity, as it does not demonstrate that impacts have been fully assessed or that appropriate safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives within the application is inadequate and fails to satisfy the statutory requirements of the Environmental Impact Assessment regime. It does not provide a structured, reasoned comparison of realistic alternatives based on their environmental effects. Instead, the application offers a narrative of the project's evolution, which does not sufficiently demonstrate that less harmful options have been properly identified, assessed, and selected over more damaging ones.

There is a lack of transparent, evidence-based comparisons concerning alternative offshore locations, development scales, or design configurations. Specifically, the application does not show that the developer has genuinely considered placing turbines further offshore, which would likely 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 impact, the absence of this analysis means that it cannot be concluded that the proposed siting is the least damaging option.

These deficiencies also extend to cable routing and landfall assessment. There is insufficient evidence that alternative routes have been properly explored in order 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 and comparative analysis indicates that mitigation by design has not been applied, 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 represents a failure to adhere to the established mitigation hierarchy, which prevents the competent authority from determining whether less harmful and more appropriate alternatives exist. Without a thorough alternatives assessment, it cannot be asserted that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this deficiency 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 is a significant omission that further contributes to the conclusion that the application has not been adequately assessed and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species associated with the application is significantly flawed, lacking a comprehensive and reliable understanding of the ecological receptors within the West Lewis coastal environment. This area is known for its high sensitivity and biological activity, yet the baseline data is insufficient, and the applied methodologies do not adequately capture key factors such as species presence, behaviour, and habitat use. Consequently, the assessment falls short of providing a solid evidential foundation necessary for impact evaluation.

One major shortcoming is the failure to appropriately assess otters, a European

Protected Species, in their use of coastal regions for foraging and movement. The application neglects to account for their core foraging range and behavioural characteristics, which results in a lack of thorough evaluation regarding the potential impacts of construction disturbances, noise, and increased human activity. This oversight directly undermines any assertions made about the absence of significant effects on otters.

Further issues arise in the analysis of basking sharks, where reliance on aerial surveys creates a substantial detection bias, especially under Atlantic conditions. This method is likely to result in an underestimation of their presence, particularly when juxtaposed with established land-based observations that highlight their frequent activity in these waters. The failure to adequately incorporate or consider this data results in an incomplete baseline, thereby diminishing the reliability of the assessment's conclusions.

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

Regulatory compliance is also in question, as the application does not fulfil the criteria set by the Environmental Impact Assessment regime and National Planning Framework 4, given that protected species have not been properly identified or evaluated. The uncertainty generated precludes the exclusion of adverse effects beyond a reasonable scientific doubt, invoking the precautionary principle. Therefore, under these circumstances, granting consent is not legally permissible.

In conclusion, the presence of incomplete baseline data, inadequate methodologies, and unfounded conclusions renders the assessment unreliable. These deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species, reinforcing the notion that the application lacks a sufficiently solid evidential basis.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency regarding the Social Impact Assessment is a critical concern that affects the community’s ability to understand the potential consequences of the proposed development. Although the developer conducted a Social Impact Assessment, including discussions with local residents, the comprehensive report has not been made publicly available. This absence creates a substantial evidential gap, hindering both public insight and the competent authority’s assessment of the social risks highlighted by the developer’s own research.

Residents are reportedly experiencing significant stress, anxiety, and worry due to the scale and proximity of the proposal. These impacts are directly informed by local engagement and should not be dismissed as mere speculation. However, the failure to

release the full report restricts thorough examination of these findings and limits the capacity to evaluate their importance in the decision-making process.

Furthermore, the proposal is perceived to pose a direct threat to the community's identity and cohesion, with "cultural loss" noted in the findings submitted by the developer. Nevertheless, these critical impacts have not been adequately addressed within the main application, nor have they been given the consideration they merit. By withholding the complete Social Impact Assessment, the developer obscures the genuine human and social costs of the development.

This lack of disclosure undermines the Environmental Impact Assessment process, as a thorough understanding of social, economic, and health impacts is vital for developments of this magnitude, especially when they may affect community character and functioning. The application falls short of providing a complete evidential foundation for weighing the benefits against the potential harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly concerning health and wellbeing. Developments are expected to promote positive health outcomes and mitigate harm, yet the evidence currently available suggests the presence of adverse effects that have not been fully revealed. Without the full assessment, it is impossible to confirm compliance with these policy requirements.

The procedural ramifications of these issues are considerable. The competent authority is unable to conduct a robust evaluation of socio-economic and health impacts without access to the complete Social Impact Assessment, which represents a significant oversight within the application and a failure to satisfy the evidential criteria of the Environmental Impact Assessment framework.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment regarding seascape, landscape, and visual impacts is fundamentally flawed, lacking an adequate representation of the scale of change and the sensitivity of the surrounding environment. The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and significant sense of remoteness. The close proximity of large-scale turbines to the shoreline would introduce a continuous and overwhelming industrial presence, fundamentally altering this character and resulting in a permanent and irreversible change to the landscape.

Moreover, the application fails to represent the magnitude of the anticipated visual alterations. The height and closeness of the turbines would overshadow views from residential areas, historic sites, and frequently visited coastal locations. This would

detrimentally affect visual amenity and undermine the essential qualities of naturalness and remoteness. The assessment does not adequately convey this impact or its importance within the context of such a sensitive landscape.

Concerns arise concerning the methodology employed in selecting and presenting visual viewpoints. There is evidence indicating that these viewpoints may not adequately reflect the most sensitive receptors or the most adverse scenarios, particularly in relation to significant cultural heritage sites and high-value landscapes. This raises the possibility that the extent of visual impact has been underestimated, thereby compromising the assessment's reliability.

Additionally, there is a notable shortcoming in the assessment's failure to acknowledge the interconnectedness of landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these as separate entities rather than understanding 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 the context in which heritage assets are perceived and severing their link to the natural horizon. This signifies not merely a visual impact but also a wider cultural and spatial detriment that has not been thoroughly assessed in the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 concerning the safeguarding of natural environments and historic assets. The proposed scale of change is incompatible with the need to protect landscape character, visual amenity, and the settings of culturally significant locations. The lack of a comprehensive worst-case assessment further weakens any assertion of policy compliance.

It is evident that the identified impacts cannot be successfully mitigated. Given the size, height, and proximity of the turbines, their presence would be overpowering and inescapable. Consequently, the resulting transformation is not merely capable of being reduced to an acceptable level through mitigation; it is fundamentally and permanently altering the landscape.

Overall, the assessment fails to accurately depict the extent of impact, the sensitivity of the environment, and the interconnected relationships between landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is not compatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal's assessment of construction and pollution risks is markedly deficient, lacking the necessary detail for a proper evaluation of likely environmental effects. The project entails significant seabed preparation and installation operations in a

challenging Atlantic environment, yet fails to present fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it depends on mitigation and contingency measures that are to be established after consent, which undermines any meaningful assessment of their adequacy or effectiveness.

This dependence on unspecified future measures raises substantial concerns due to the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are at risk from sediment disturbance and potential contamination. Although the application acknowledges risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it does not sufficiently detail how these risks will be prevented, controlled, or monitored.

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

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application obstructs the evaluation of whether adequate safeguards exist to address pollution events. This introduces procedural risks and compromises the competent authority's ability to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards is in direct conflict with the Environmental Impact Assessment regime's requirements. Significant effects and mitigation strategies must be evaluated prior to consent, and in the absence of such information, a lawful determination cannot be achieved. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, detailed management plans, and uncertainty surrounding potential impacts collectively render the assessment materially inadequate. These deficiencies hinder a thorough evaluation of construction and pollution risks and further affirm that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment of fisheries and marine life presented in this application is inadequate and fails to deliver a thorough evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem alongside a vital fishing industry, yet the application does not convincingly demonstrate that these uses and habitats can be preserved without causing considerable disruption.

A significant concern arises from the assumption that fishing activities can be relocated

without repercussions. There is no supporting evidence that alternative fishing grounds are not only available but also accessible and capable of absorbing additional pressure. This critical gap poses a risk of overfishing in other areas, which could lead to detrimental economic consequences for the local fishing fleet. In the absence of a clear, evidence-based assessment, the effects on fisheries and the livelihoods they support remain unclear.

Moreover, the proposal brings with it considerable risks to marine species, particularly due to the underwater noise associated with construction. The use of high-energy hammer piling over an extended period is likely to create disturbances over large distances, impacting species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises urgent concerns, yet these effects are minimised in the application without sufficient supporting evidence.

There is a troubling inconsistency within the application, where the necessity for licences to allow harm to European Protected Species is acknowledged, while simultaneously downplaying the impacts as negligible. This contradiction undermines the assessment's credibility and raises serious issues regarding compliance with the Habitats Regulations, particularly where anticipated harm requires legal authorisation.

Additionally, the assessment neglects to consider cumulative impacts stemming from various pressures, such as habitat disturbance, noise, and the displacement of fishing activity. A comprehensive evaluation of these combined effects is essential to understand the overall impact on marine ecosystems and socio-economic conditions.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The evaluation of onshore infrastructure is fundamentally flawed, failing to account for the comprehensive impacts of what constitutes a single integrated project. The offshore turbines and the related onshore activities are inherently interconnected, yet they have been assessed in isolation. This fragmented approach obscures the complete understanding of environmental and socio-economic consequences.

Onshore components include cabling that traverses protected moorland, the construction of a substation in proximity to Stornoway, and the necessary access

infrastructure through sensitive landscapes. These activities necessitate excavation in areas of deep peat, notably within Barvas Moor, an important carbon reservoir and ecologically delicate habitat. The application does not offer a thorough evaluation of these impacts, which hinders a full appreciation of the project's overall environmental footprint.

The omission or deferral of onshore impact assessments restricts the ability to properly evaluate cumulative effects. The Environmental Impact Assessment process stipulates that all aspects of a project must be considered collectively; however, the distinct treatment of offshore and onshore elements results in a failure to grasp the combined effects on peatlands, habitats, and local communities.

Significant risks are posed to sensitive environments, including machair systems and peatland areas, which are designated for policy protection. The application lacks clear evidence that impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented. This reveals a distinct evidential gap regarding the protection of biodiversity.

Concerns also arise regarding the carbon balance associated with the proposal. The disturbance of peatland leads to the release of stored carbon, which may create a carbon debt that contradicts the aims of renewable energy initiatives. The application inadequately addresses this concern and does not prove that the overall carbon balance is advantageous.

Furthermore, routing infrastructure through active croft land presents potential conflicts with existing land use and legal rights. The application fails to demonstrate that the required consents or processes have been initiated, which raises significant doubts about the feasibility and lawful execution of the project.

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

Overall, the separation of project elements, the lack of a comprehensive assessment, and the insufficient evidence regarding environmental and land use impacts render this segment of the application incomplete and untrustworthy, preventing a lawful determination.

TOURISM

The application presents a concerning deficiency in assessing tourism impacts, crucial for the economy of the Isle of Lewis. With tourism significantly reliant on the region's wild coastline, near-pristine landscapes, dark skies, and overall sense of remoteness, the application acknowledges that 86% of visitors are attracted by the scenery. However, it fails to provide any quantified assessment of how large-scale offshore infrastructure could alter visitor numbers, behaviours, or the economic contributions

made by this sector.

Tourism has seen substantial growth, with revenue 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, there is no modelling to examine how the potential industrialisation of the seascape and subsequent loss of environmental quality might affect Tourism Gross Value Added or the overall economic resilience of the area. This lack of analysis renders it impossible to ascertain if the proposed development would result in a net economic benefit or detriment to a crucial and expanding sector.

Furthermore, the assessment neglects to address the critical role that environmental quality plays in tourism, particularly the value of unspoiled landscapes and dark skies to the visitor experience, alongside emerging markets such as nature-based tourism and astro-tourism. The failure to include a Dark Skies Assessment exacerbates this issue, creating a considerable gap in understanding the effects on a recognised and burgeoning segment of the local economy.

Given the limited economic diversification within the island community, the neglect to assess tourism impacts carries broader ramifications for employment, local businesses, and the sustainability of the community. The lack of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been adequately evaluated as stipulated by 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 show net benefit. It also contradicts strategic objectives that position tourism as a priority growth sector, failing to provide sufficient evidence for the competent authority to evaluate the economic consequences of the proposal.

Collectively, the shortcomings in quantifying tourism impacts, the failure to analyse environmental factors influencing visitor behaviour, and the disregard for the island's economic dependencies culminate in a significant evidential gap. This inhibits a thorough evaluation of economic effects and supports the conclusion that the application is fundamentally incomplete.

SUMMARY

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

Moreover, the application lacks a complete and reliable evidential basis for decision-making. There are significant deficiencies in baseline data, the utilisation of an

undefined design envelope, reliance on unspecified mitigation measures, and the omission of vital impact pathways such as nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, hindering a full understanding of potential significant effects or residual impacts.

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

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

Environmental risks associated with the proposal remain uncertain and potentially significant. The evaluations regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and contain internal inconsistencies. The evidential standard necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, activating the precautionary principle and obstructing a lawful conclusion that impacts are acceptable.

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

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

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

Additional Comments

I am concerned about the impact on the sustainability of our island as we rely heavily on tourism. Those that visit do so because they enjoy the unspoilt beauty of the island and coastline.

The size and proximity of the proposed wind turbines is also alarming given concerns in relation to potential impact on health and well-being.

There is no guarantee or evidence to support the idea that this will provide employment for locals.

There will be ecological and marine life disturbance and destruction and potential for pollution during construction impacting on food safety also.

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: 64DC4CF0

Member of the public 1408

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

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks 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.

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.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

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

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

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency regarding the assessment of social impacts, health, and wellbeing raises serious concerns about the application’s compliance with necessary standards. The developer has commissioned a Social Impact Assessment, which included focus groups with local residents. However, the full report has not been made available, resulting in a significant evidential gap that hinders public understanding and

prevents the competent authority from accurately assessing social risks identified in the developer's research.

Current summaries suggest that residents are experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal, derived from direct engagement rather than speculation. Yet, the withholding of the complete assessment restricts proper scrutiny of these findings and limits their significance within the decision-making process.

Furthermore, there is evidence indicating that the proposal threatens community identity and cohesion, with "cultural loss" highlighted in the developer's findings. These impacts have not been fully incorporated into the main application or given the weight they deserve. Thus, the failure to disclose the complete 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 essential for developments of this magnitude, especially when community character and functioning may be adversely affected. The omission of the full dataset results in an application that does not provide a complete evidential basis for weighing benefits against harm.

From a policy standpoint, the application falls short of demonstrating compliance with National Planning Framework 4 concerning health and wellbeing. Developments must promote positive health outcomes and mitigate harm; however, the evidence available points to existing adverse effects that remain undisclosed. Without the complete assessment, demonstrating compliance with this policy is unattainable.

The procedural ramifications are considerable. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the entire Social Impact Assessment. This represents a significant omission within the application and signifies a failure to meet the evidential standards of the Environmental Impact Assessment regime.

In summary, the failure to disclose the complete Social Impact Assessment, alongside evidence of existing adverse impacts, leads to an incomplete and unreliable assessment. This lack of information obstructs a lawful determination and supports the conclusion that the application is insufficiently substantiated.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal involves the introduction of large-scale turbines near the West Lewis coastline, which is characterised by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. This development would create a continuous industrial presence that fundamentally alters the existing landscape, resulting in a permanent and irreversible transformation. The application fails to accurately represent the magnitude of visual change that would result from the turbines, which would dominate

views from residential areas, historic sites, and popular coastal locations, thereby impacting visual amenity and eroding the qualities of naturalness and remoteness.

Additionally, there are methodological issues concerning the selection and presentation of visual viewpoints within the assessment. It appears that some viewpoints do not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This oversight introduces the risk of understating the visual impact, which ultimately undermines the reliability of the entire assessment.

Another significant shortcoming is the lack of consideration for the interconnected relationship between landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape that is visually and spatially linked to the Atlantic horizon. By treating these sites as isolated rather than recognising their interdependence, the assessment results in an incomplete evaluation of the impacts on their setting and cultural significance. The proposed industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are perceived and severing their relationship with the natural horizon. This effect represents not only a visual impact but also a broader cultural and spatial harm that the application fails to adequately assess.

From a policy standpoint, the proposal conflicts with National Planning Framework 4, particularly regarding the protection of natural places and historic assets. The scale of change is at odds with the obligation to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further detracts from any claims of policy compliance.

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

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

CONSTRUCTION AND POLLUTION RISKS

The application lacks adequate detail regarding construction and pollution risks, rendering the assessment materially deficient. It proposes substantial seabed preparation and installation works within a high-energy Atlantic environment, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on the preparation of mitigation and contingency measures post-consent, which obstructs a meaningful evaluation of their adequacy or effectiveness.

This reliance on undefined future measures is particularly concerning given the sensitivity of the receiving environment. The West Lewis coastline supports clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide sufficient detail on how these risks will be prevented, controlled, or monitored.

Uncertainties also exist regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. The lack of robust modelling and clearly defined management strategies means that it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty extends to the potential effects on marine species and habitats identified as sensitive within the wider assessment.

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

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

Overall, the lack of defined mitigation measures, insufficient detailed management plans, and uncertainties regarding potential impacts hinder a robust evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application fails to demonstrate compliance with the National Planning Framework 4 or the National Marine Plan. It does not provide assurance that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity. This lack of compliance raises significant concerns about whether the proposal can be considered sustainable development.

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

A key issue is the assumption that fishing activity can be displaced without repercussions. The application does not provide evidence that alternative fishing grounds are available, accessible, or capable of accommodating additional pressure. This is crucial, as displacement could lead to overfishing in other areas and might have wider economic consequences for the local fleet. Without a clear assessment based on evidence, the impacts on fisheries and local livelihoods remain poorly understood.

Furthermore, substantial risks to marine species are introduced, particularly due to underwater noise generated during construction. The use of high-energy hammer piling for extended periods is likely to disturb marine life over large distances, notably affecting dolphins. Concerns arise from the predicted disturbance to a significant portion of the local bottlenose dolphin population, yet the application downplays these effects without adequate supporting evidence.

There is also a contradiction within the application, where the requirement for licences to harm European Protected Species is acknowledged while simultaneously stating that impacts are negligible. This inconsistency undermines the credibility of the assessment and raises serious concerns about compliance with the Habitats Regulations, especially where harm is expected to the extent that legal authorisation is necessary.

The assessment neglects to consider cumulative impacts from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. Without a comprehensive evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions cannot be determined.

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

DARK SKIES AND NOCTURNAL WILDLIFE

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

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

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

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

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

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

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

TOURISM

The application neglects to properly assess the impacts on tourism, which is a vital component of the Isle of Lewis economy, and it fails to evaluate the economic and social consequences for this key sector. Tourism relies heavily on the island's wild coastline, nearly untouched landscapes, dark skies, and the sense of remoteness that attracts visitors. While the application states that 86% of tourists are drawn to the scenery, it does not provide a quantified analysis of how large-scale offshore infrastructure could influence visitor numbers, behaviour, or their overall economic contribution.

Tourism has seen significant growth, with its value rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and contributing up to 16% of the island's economy. However, the application fails to model the potential impacts of industrialising the seascape and the resulting loss of environmental quality on Tourism Gross Value Added or the wider economic resilience of the area. Without this critical analysis, it remains unclear whether the proposed development would yield a net

economic benefit or negatively affect an established and expanding sector.

Furthermore, the assessment overlooks the importance of environmental quality to tourism, including the essential role of unspoiled landscapes and dark skies in enhancing visitor experiences and emerging markets such as nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment further exacerbates this shortfall, creating a significant gap in understanding the potential impacts on a growing segment of the local economy.

In an island community that faces challenges regarding economic diversification, the failure to evaluate tourism impacts has broader implications for employment, local businesses, and the sustainability of communities. The lack of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been sufficiently examined, contrary to the requirements outlined 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 necessity to illustrate 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 ramifications of the proposal.

Overall, the lack of quantification of tourism impacts, the failure to assess the environmental factors that influence visitor behaviour, and the disregard for the economic dependency of the island culminate in a substantial evidential gap. This inhibits 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 is fundamentally flawed as it does not meet the requirements for sustainable development according to statutory duties, national policy, and evidential standards. It mirrors the critical issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, specifically regarding the unacceptable scale of industrialisation. This new application is presented under a policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet fails to address these essential elements.

The evidential basis for determining the application is incomplete and unreliable. There are significant gaps in baseline data, and the proposal relies on an undefined design envelope and unspecified mitigation measures. Key impact pathways, such as those concerning nocturnal wildlife, onshore infrastructure, and tourism, have been omitted. As a result, the Environmental Impact Assessment is inadequate, preventing a thorough understanding of likely significant effects or residual impacts.

Procedural shortcomings are evident as well. The lack of a compliant Island Communities Impact Assessment breaches the statutory duty established under the

Islands (Scotland) Act 2018. Additionally, not disclosing the full Social Impact Assessment represents a serious omission. These issues hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

In direct violation of National Planning Framework 4, the application fails to protect biodiversity, natural areas, and cultural heritage. It does not adequately demonstrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, due to the absence of tourism impact modelling. Furthermore, the cumulative impacts of both offshore and onshore components have not been thoroughly assessed, leaving effects on peatlands, carbon balance, habitats, and crofting land obscured.

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

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

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 8BEBB0F5

Member of the public 1409

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. A thorough review of the Environmental Impact Assessment Report and its supporting documentation reveals significant deficiencies across 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 wind farm raise serious questions about its alignment with statutory requirements, national policy, and the principles of sustainable development.

Fundamentally, the application lacks a sufficient evidential basis to support a lawful determination. There are critical gaps in environmental data, with baseline information proving limited and inconsistent. Furthermore, essential elements of the proposal remain undefined. The flexible design framework employed inhibits a clear assessment of potential significant effects, while the reliance on unspecified mitigation measures raises concerns about their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects are not backed by adequate evidence.

The proposal presents clear and substantial conflicts with policy. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate that the national requirements for protecting biodiversity, climate interests, and environmental integrity will be fulfilled. These policy conflicts directly affect the statutory tests required for consent and weaken the ability of the competent authority to determine that the development is acceptable from a policy perspective.

The unprecedented scale of the proposal in this location, with large turbines placed in close proximity to the shoreline, raises significant concerns regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation measures, evidential shortcomings, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. Given these circumstances, the precautionary principle must be invoked.

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.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment regarding community identity and cultural heritage is severely lacking, overlooking the West Lewis coastline as a dynamic cultural landscape where

environment, language, tradition, and community are deeply intertwined. The approach taken in the application is overly simplistic, treating heritage merely as a collection of static assets rather than acknowledging their ongoing social, cultural, and spiritual significance within the community.

There is a particular concern regarding the culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are active sites of burial and spiritual practice, yet they are mistakenly classified as static features. This failure to acknowledge their continued use and meaning, along with the potential impact of development on their setting, leads to an incomplete understanding of cultural effects and dismisses their vital role in community life.

Moreover, the assessment neglects to evaluate intangible cultural heritage, which encompasses the Gaelic language, local traditions, and the enduring relationship that the community maintains with the coastal environment. These aspects are fundamental to the identity of the area, yet they are entirely omitted from the evaluation, creating a substantial gap in understanding the cultural implications of the development.

Concerns also arise regarding community rights and the need for proper engagement. The Gaelic-speaking population, with its distinct cultural identity and characteristics of an Indigenous People, has not been afforded the process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the integrity of the assessment and fails to align with accepted principles of participation in decisions that affect cultural and environmental interests.

Additionally, a significant procedural shortcoming is the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. Without this essential assessment, the competent authority cannot meet its legal obligation to assess the social, cultural, and economic ramifications for the island community. This omission alone obstructs a lawful determination.

From a policy standpoint, these shortcomings place the proposal in direct opposition to National Planning Framework 4, particularly regarding the safeguarding of historic assets and spaces. The oversight in considering both tangible and intangible heritage, as well as failing to recognise living cultural practices, clearly deviates from established policy requirements.

Overall, the neglect to evaluate living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential void. The cultural impacts of the development remain inadequately assessed, and the application does not provide an adequate foundation for understanding the true cultural cost of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

The application does not sufficiently represent the magnitude of visual change. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and widely used coastal locations, directly impacting visual amenity and undermining the defining qualities of naturalness and remoteness. This level of impact and its significance within such a sensitive landscape have not been properly conveyed in the assessment.

Moreover, there are methodological concerns regarding the selection and presentation of visual viewpoints. Evidence suggests that these viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. Such shortcomings risk understating the magnitude of visual impact, thus undermining the reliability of the assessment.

The assessment also neglects to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Important sites, like the Calanais Standing Stones and other Scheduled Monuments, are integral to a wider landscape setting connected by visual and spatial relationships to the Atlantic horizon. Treating these assets in isolation fails to acknowledge their interdependence, resulting in an incomplete evaluation of impacts on their setting and cultural significance.

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

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

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

In conclusion, the assessment fails to accurately reflect the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and

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

FISHERIES AND MARINE LIFE

The evaluation of marine life and fisheries associated with the proposed development is inadequate, failing to adequately address the ecological and socio-economic repercussions. The coastal waters off West Lewis are home to a diverse marine ecosystem and support a thriving fishing industry. However, the application does not convincingly demonstrate that these vital habitats and activities can be preserved or sustained without significant disruption.

A significant concern is the assumption that displacing fishing operations will not have repercussions. The documentation lacks evidence regarding the availability, accessibility, and capability of alternative fishing grounds to manage increased pressure. This gap is crucial as it raises the risk of overfishing in other areas, potentially leading to broader economic challenges for the local fishing fleet. Without a thorough and evidence-based evaluation, the implications for fisheries and local livelihoods remain unclear.

Moreover, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated during construction activities. The high-energy hammer piling anticipated over an extended timeframe is likely to disrupt marine life across extensive distances, impacting species such as dolphins. The predicted disturbance to a large portion of the local bottlenose dolphin population is particularly concerning; however, the application diminishes the importance of these impacts without adequate supporting evidence.

There exists a notable inconsistency in the application, which acknowledges the necessity for licenses to permit harm to European Protected Species while simultaneously characterising these impacts as negligible. This contradiction severely undermines the credibility of the assessment and raises questions regarding adherence to the Habitats Regulations, especially in situations where harm is expected to reach a level that requires legal approval.

Additionally, the assessment does not adequately address the cumulative impacts resulting from various pressures such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough analysis of these combined influences, it is impossible to ascertain the overall effects on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not establish that the development can harmonise with current marine users or evade unacceptable consequences for marine biodiversity, thus obstructing any assertion that the proposal aligns with sustainable development principles.

In summary, the deficiencies related to the lack of evidence on fishing displacement, the underestimation of acoustic impacts, and the internal contradictions within the application culminate in an incomplete and unreliable assessment. These shortcomings hinder a thorough evaluation of the potential impacts on marine life and fisheries.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife represents a serious gap within the Environmental Impact Assessment. The West Lewis coastline boasts exceptionally dark skies, which are vital not only to environmental quality but also to cultural identity and tourism. The proposed introduction of permanent red aviation lighting, which would be visible over extensive distances, threatens to create a continuous and intrusive “wall of light” effect across the western horizon, fundamentally changing the night-time landscape.

Moreover, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This lack of consideration is particularly concerning given the significance of dark skies to the area's identity and the growth of tourism sectors, including astro-tourism. The neglect to assess these impacts leads to a notable deficiency in the overall environmental and landscape evaluation.

Equally alarming is the lack of analysis regarding the effects on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel exhibit high sensitivity to artificial lighting, which can result in disorientation and heightened risks of collision. The application does not feature any lighting impact assessment or phototaxis study, and as such, it neglects to consider how the proposed aviation lighting could impact these species or contribute to increased mortality rates.

This shortcoming is further exacerbated by the dependence on daytime survey data in the ornithological assessment, which fails to capture nocturnal behaviours or the associated hazards. Kittiwakes, for example, may forage or migrate at night and are likewise susceptible to disorientation from artificial lighting, a risk that has not been adequately evaluated. The lack of site-specific night-time data prevents a comprehensive understanding of the potential ecological impacts.

Without a thorough assessment of nocturnal effects, it remains impossible to ascertain whether protected species or designated sites might face adverse impacts. The necessary evidential standard to rule out negative effects beyond reasonable scientific doubt cannot be fulfilled, invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission contravenes National Planning Framework 4, which pertains to the safeguarding of natural places and environmental quality. It also diminishes the broader evaluation of landscape and seascape effects, as the character of the night forms an essential component of the environment.

In summary, the lack of any assessment concerning dark skies and nocturnal wildlife constitutes a significant evidential shortfall. The absence of baseline data, impact modelling, and species-specific analysis leaves the application incomplete and unsuitable for supporting a lawful determination.

TOURISM

The Isle of Lewis sees tourism as a critical component of its economy, with the sector having expanded from £65 million in 2017 to over £81.5 million, providing more than 1,000 jobs and constituting up to 16% of the local economy. Despite the significance of this industry, the assessment of tourism impacts within the application is inadequate, particularly regarding the social and economic consequences for this key sector. It is noted that 86% of visitors are attracted by the area's scenic beauty, yet there is no quantifiable analysis of how the introduction of large-scale offshore infrastructure might influence visitor numbers, behaviours, or their overall economic contributions.

Furthermore, the assessment overlooks the crucial relationship between environmental quality and tourism, disregarding how unspoiled landscapes and dark skies enhance visitor experiences and appeal to growing markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortfall, creating a substantial gap in understanding the impacts on an increasingly important segment of the local economy.

The implications of this oversight are considerable, especially for an island community that relies heavily on tourism due to limited economic diversification. The failure to evaluate tourism impacts carries broader consequences for employment, local businesses, and the sustainability of the community. Notably, the absence of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been properly assessed, as mandated under the Islands (Scotland) Act 2018.

On a policy level, the application does not demonstrate adherence to the National Planning Framework 4, particularly regarding economic impact and the requirement for a net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector, failing to provide adequate evidence for the competent authority to evaluate the economic consequences of the proposed development.

The cumulative effect of not quantifying tourism impacts, neglecting the environmental factors that influence visitor behaviour, and overlooking the island's economic dependency results in a significant evidential gap. This deficiency hampers a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates a critical failure to meet the standards of sustainable development when evaluated against statutory requirements, national policy, and necessary evidence. This application mirrors the fundamental issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was identified. Now, it is being presented under a policy framework that places increased emphasis on biodiversity, peatland preservation, landscape integrity, and the wellbeing of the community.

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

Furthermore, procedural shortcomings are evident. The absence of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty as outlined in the Islands (Scotland) Act 2018, while the failure to present a complete Social Impact Assessment signifies a material omission. Such inadequacies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal also stands in opposition to National Planning Framework 4, lacking demonstration of biodiversity protection, safeguarding of natural areas, and preservation of cultural heritage. It fails to show that the health and wellbeing impacts are acceptable and cannot prove a net economic benefit due to the lack of tourism impact modelling. The cumulative impacts of both offshore and onshore components have not been thoroughly evaluated, obscuring consequences for peatlands, carbon balance, habitats, and crofting land.

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

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

In summary, the application is procedurally and substantively unsuitable for determination. The significant information deficiencies, along with conflicts with policy

and unresolved environmental risks, preclude a lawful and evidence-based decision. The competent authority must reject this application or invoke the appropriate regulatory measures to compel the submission of the necessary information.

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

Additional Comments

I have recently visited Lewis, specifically to explore the coastline via kayak and to watch marine wildlife.

I don’t believe that adequate due diligence has been implemented when deciding on this off shore wind location.

The profits will not benefit the local community, and vast amounts of harm will be done.

I am in no doubt that the climate crisis must be confronted, but it should be sensitively and appropriately done.

I urge you to reconsider plans.

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: 11AF759D

Member of the public 1410

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The objection arises from a careful examination of the Environmental Impact Assessment Report and its supporting documents, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural compliance. Situated off the west side of the Isle of Lewis, this area is characterised by its Atlantic-facing coastline, near-pristine environment, and a strong cultural identity. The proposed development's scale, design, and proximity to the shoreline raise serious concerns regarding its alignment with statutory requirements, national policies, and the principles of sustainable development.

The application does not provide a sufficient evidential basis for a lawful decision. There is a notable absence of critical environmental data, with baseline information that is both limited and inconsistent. Key components of the proposal remain undefined, which undermines the ability to assess likely significant effects. Additionally, the reliance on unspecified mitigation measures makes it impossible to evaluate their potential effectiveness. Consequently, the documentation fails to offer a comprehensive understanding of the potential environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidence.

Substantial policy conflicts are evident throughout the proposal. It appears to contradict the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, especially concerning biodiversity, natural habitats, cultural heritage, and health and wellbeing. The application does not convincingly demonstrate that it can meet national obligations to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts directly impact the statutory tests necessary for obtaining consent and compromise the ability of the competent authority to determine the development's acceptability from a policy perspective.

Furthermore, the unprecedented scale of the proposal, with large turbines located near the shoreline, raises significant issues related to landscape capacity, visual impact, and overall environmental consequences. In light of the insufficient information provided, reliance on undefined mitigation strategies, evidential weaknesses, and clear non-compliance with established policies, it is evident that the application is incomplete and cannot support a lawful determination. In these circumstances, the precautionary principle should be invoked.

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 evaluation of social impacts, health, and wellbeing is fundamentally inadequate and lacks the necessary transparency for a lawful appraisal. The developer has undertaken a Social Impact Assessment that included focus groups with local residents; however, the comprehensive report remains unpublished. This 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 available to the public suggest that residents are currently facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposed development. These concerns stem from direct engagement, and thus are not merely speculative. The lack of disclosure regarding the complete assessment limits scrutiny of its findings and hampers the evaluation of their significance in the decision-making process.

Furthermore, there is evidence indicating that the proposal is perceived as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Nonetheless, these implications have not been properly integrated into the main application or afforded the appropriate consideration. By withholding the full Social Impact Assessment, the developer obscures the true human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. An understanding of social, economic, and health impacts is vital for developments of this magnitude, especially where community character and functionality are at stake. The failure to provide the complete data set results in the application lacking a comprehensive evidential basis necessary for evaluating the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4 concerning health and wellbeing. Development should promote positive health outcomes and mitigate harm; however, the evidence available indicates pre-existing adverse effects that have not been fully disclosed. Without the full assessment, compliance with this policy remains unproven.

The procedural consequences of this situation are significant. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This omission within the application represents a failure to meet the evidential standards required by 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 a lawful determination and supports the assertion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development of large-scale turbines near the West Lewis coastline raises significant concerns regarding its impact on seascape, landscape, and visual integrity. This area is characterised by an open Atlantic horizon, an undeveloped landscape, and a profound sense of remoteness. Introducing such industrial structures in close proximity to the shoreline would establish a persistent industrial presence, fundamentally altering the unique character of the environment and leading to a permanent transformation of the landscape.

The application fails to adequately capture the magnitude of the visual changes anticipated. The size and proximity of the turbines would overshadow views from nearby residential areas, historic sites, and popular coastal locations, negatively impacting visual amenity and diminishing the area's defining characteristics of naturalness and remoteness. The existing assessment does not effectively communicate the significance of these impacts within the context of this sensitive landscape.

Concerns also arise regarding the methodology used for selecting and presenting visual viewpoints. There is evidence to suggest that the viewpoints chosen do not fully represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and valuable landscapes. This suggests a potential understatement of the visual impact, which compromises the reliability of the assessment.

Moreover, the assessment does not adequately evaluate the interconnected relationship between the landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting that is visually and spatially linked to the Atlantic horizon. The current assessment treats these heritage assets in isolation, failing to recognise their interdependence and leading to an incomplete evaluation of the impacts on their setting and cultural importance.

The proposed industrialisation of the seascape would disrupt these relationships, fundamentally changing how heritage assets are experienced and severing their connection to the natural horizon. This alteration represents not just a visual impact but also a wider 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 regarding the protection of natural places and historic assets. The scale of transformation proposed conflicts with the necessity to safeguard landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertion of compliance with relevant policies.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be both dominant and unavoidable. Consequently, the changes would be fundamental and permanent, rather

than reducible to an acceptable level through mitigation efforts.

Collectively, the assessment fails to represent accurately the scale of the impacts, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings inhibit a reliable evaluation and reinforce the conclusion that the proposal is fundamentally incompatible with the protection of this landscape.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the proposed project lacks completeness, particularly in its consideration of onshore infrastructure impacts. This project, involving offshore turbines and onshore works, is an integrated proposal, yet it has been evaluated separately. This fragmented analysis obscures the true environmental and socio-economic effects.

The onshore aspects encompass cabling across protected moorland, the construction of a substation near Stornoway, and related access infrastructure through sensitive landscapes. These operations will require excavation in areas of deep peat, especially within Barvas Moor, which is vital for carbon storage and is an ecologically sensitive habitat. The application fails to provide a thorough evaluation of these impacts, hindering a clear understanding of the overall environmental footprint of the project.

By not fully assessing the onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all project components are considered together. However, the division of offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities are not completely understood.

Sensitive habitats, such as machair systems and peatland environments, face considerable risks and are protected by policy. The application does not show that the impacts on these habitats have been fully evaluated or that suitable avoidance measures are in place. This results in a significant evidential gap regarding biodiversity protection.

Concerns also arise regarding the carbon balance associated with the project. Disturbance of 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 concern or prove that the overall carbon balance remains positive.

Routing infrastructure through active croft land may lead to conflicts with existing land use and legal rights. There is no evidence provided that the necessary consents or processes have been initiated, raising doubts about the feasibility and legal compliance of the project.

From a policy viewpoint, the lack of a comprehensive assessment of the project as a whole, along with the failure to demonstrate protection of peatlands, habitats, and land

use interests, contradicts the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further weakens the application.

Overall, the division of project components, the absence of a thorough assessment, and the lack of evidence regarding environmental and land use impacts result in an incomplete and unreliable application, inhibiting a lawful determination.

TOURISM

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

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

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

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

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

Collectively, the shortcomings in quantifying tourism impacts, assessing environmental influences on visitor behaviour, and acknowledging the island's economic dependence

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

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal constitutes a significant failure to meet the requirements of sustainable development as outlined by statutory duties, national policy, and evidential standards. It mirrors the core issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. Despite now being evaluated under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application remains fundamentally flawed.

A reliable evidential basis for determination is lacking, with critical gaps in baseline data and an undefined design envelope. The reliance on unspecified mitigation measures and the omission of key impact pathways, such as effects on nocturnal wildlife, complete onshore infrastructure, and tourism, indicate that the Environmental Impact Assessment is incomplete. This insufficiency prevents a comprehensive understanding of potential significant effects or residual impacts.

Procedural failures are evident, including the absence of a compliant Island Communities Impact Assessment, which breaches statutory duties under the Islands (Scotland) Act 2018. Additionally, the lack of a full Social Impact Assessment represents a material omission. These shortcomings hinder the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

Moreover, the proposal stands in direct contradiction to the National Planning Framework 4. It does not demonstrate adequate protection of biodiversity, natural places, and cultural heritage, nor does it show that the impacts on health and wellbeing are acceptable. Furthermore, the absence of tourism impact modelling precludes evidence of a net economic benefit. The assessment of cumulative impacts involving both offshore and onshore components has not been sufficiently conducted, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainty remains around environmental risks, particularly concerning marine ecology, seabirds, protected species, and marine mammals. Incomplete and internally inconsistent assessments have failed to meet the evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt. This engages the precautionary principle, making it impossible to lawfully conclude that impacts are acceptable.

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

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

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

Additional Comments

Our islands have a unique culture and magical landscape...such developments destroy everything that sits at the heart of The Hebrides....the untouched rugged natural landscape that has been gifted to us by nature.

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: 4E9F6B1C

Member of the public 1411

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.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and does not offer a clear or dependable account of the potential environmental effects of the proposal. The application employs a flexible Project Design Envelope without committing to specific turbine dimensions or layouts, which creates considerable uncertainty. This flexibility hinders the ability to apply a worst-case scenario consistently and compromises the assessment's integrity. As a result, the impacts presented may not accurately represent the development that will ultimately be built, which limits both public understanding and the competent authority's ability to grasp the true extent of environmental effects.

Additionally, the application depends significantly on mitigation measures, monitoring strategies, and management plans that have yet to be defined. Seeking consent based on the expectation that environmental harm will be addressed later undermines any meaningful evaluation of effectiveness or the assessment of residual impacts. This postponement of crucial information to stages following consent is procedurally inappropriate and contradicts the objectives of the Environmental Impact Assessment regime, which necessitates clear identification of likely significant effects and mitigation before determination.

There are substantial evidential shortcomings, such as gaps in baseline data and limitations in methodology, alongside reliance on assumptions instead of site-specific evidence. Consequently, there is uncertainty regarding the scale and significance of impacts, especially where findings of negligible or non-significant effects are made without adequate supporting data. The lack of sufficient information obscures the understanding of cumulative and worst-case impacts, introducing scientific uncertainty that does not align with statutory requirements.

As a result, the application does not satisfy the evidential threshold mandated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate adherence to National Planning Framework 4, particularly in terms of biodiversity protection and environmental integrity, as it cannot be shown that impacts have been thoroughly assessed or that suitable safeguards are in place.

In summary, the combination of an undefined design envelope, unspecified mitigation, and deficiencies in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These issues hinder a lawful and thorough assessment of environmental effects and indicate that the competent authority cannot make a determination based on the provided information.

ASSESSMENT OF ALTERNATIVES

The application does not provide a structured, evidence-based assessment of alternatives as required by the Environmental Impact Assessment regime. Instead, it presents a narrative of project evolution, lacking a reasoned comparison of realistic alternatives based on environmental effects. This failure to identify, assess, and prefer

less harmful options over more damaging solutions is a significant oversight.

There is also no transparent examination of alternative offshore locations, development scales, or design configurations. Specifically, the application does not show that the developer has seriously considered positioning turbines further offshore, where there would likely be a reduction in visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline, along with the crucial role of proximity to shore in determining impact, means that the lack of this analysis prevents a conclusion that the proposed site is indeed the least damaging option.

The deficiencies extend to the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been adequately explored to mitigate impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The absence of a clear avoidance strategy, alongside a lack of comparative analysis, suggests that mitigation by design has not been employed, leading to reliance on post-design mitigation measures instead.

Consequently, the application fails to show that environmental harm has been minimised through proper site selection, layout, and infrastructure routing. This represents a breach of the established mitigation hierarchy and hinders the competent authority's ability to ascertain whether more appropriate and less harmful alternatives are available. Without a thorough assessment of alternatives, it cannot be determined that the proposal is a sustainable or compliant solution in line with policy requirements.

From a policy standpoint, this deficiency calls into question compliance with National Planning Framework 4, particularly concerning the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a material omission that contributes to the conclusion that the application has not been properly evaluated and cannot justify a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The current application presents significant deficiencies in its assessment of marine ecology and protected species, particularly within the sensitive and biologically active marine environment of West Lewis. The methodologies employed lack the depth required to capture a comprehensive understanding of species presence, behaviour, and habitat use, leading to incomplete baseline data that undermines the reliability of the evaluation of potential impacts.

A notable gap in the assessment pertains to otters, which are classified as a European Protected Species. The application does not adequately recognise their active use of coastal areas for foraging and movement. This oversight means that critical aspects such as their core foraging range and behavioural patterns have not been appropriately considered, leaving the assessment of potential construction disturbances, noise, and increased activity unexamined. Consequently, the conclusions drawn regarding the absence of significant effects on otters are fundamentally flawed.

Further issues arise in the assessment of basking sharks, where the reliance on aerial surveys introduces a significant detection bias, particularly in Atlantic conditions. This methodological approach risks underestimating the presence of basking sharks, especially when juxtaposed with well-established land-based observations that indicate frequent usage of these waters. The failure to incorporate or adequately consider such data culminates in an incomplete baseline, casting doubt on the reliability of the conclusions reached.

The shortcomings in methodology lead to conclusions of negligible or non-significant effects being based more on assumptions than on robust evidence. Additionally, the lack of sufficient baseline data inhibits a meaningful evaluation of cumulative and indirect impacts, which include seasonal variations and broader ecosystem interactions. This generates uncertainty about the true extent of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the criteria set out by the Environmental Impact Assessment regime and the National Planning Framework 4, given that protected species have not been sufficiently identified or assessed. The uncertainty introduced by these deficiencies precludes the dismissal of adverse effects with reasonable scientific certainty, thus invoking the precautionary principle. Under these conditions, granting consent would not be lawful.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions fundamentally undermines the assessment's reliability. These factors obstruct a thorough evaluation of impacts on marine ecology and protected species, reinforcing the argument that the application fails to present a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposal is fundamentally flawed, exhibiting substantial gaps in evidence and inconsistencies that undermine its conclusions. Key foraging areas and migratory pathways, particularly along the west coast of the Isle of Lewis, support internationally important seabird populations, many of which are already experiencing declines. However, the application fails to demonstrate, to the necessary evidential standard, that these species will not be adversely affected by the development. The implications of displacement, collision risk, and habitat loss have not been robustly evaluated.

There exists a significant contradiction within the application. The developer concludes that there are no significant adverse effects while simultaneously presenting a Habitats Regulations derogation case, which is only warranted when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the evidence presented.

Moreover, the assessment does not sufficiently demonstrate that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is inadequately considered, and reliance on modelling approaches introduces uncertainty, especially for species in severe decline like Kittiwakes and Fulmars. The methodologies utilised are likely to underestimate mortality rates, particularly given the incomplete baseline data and a lack of comprehensive understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor presents additional significant risks, effectively creating a barrier along a primary flight path for species migrating between the United Kingdom and Iceland. The application does not thoroughly assess the long-term implications of sustained mortality in this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application fails to meet the evidential threshold necessary to assert no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, alongside gaps in data and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This invokes the precautionary principle, which precludes a lawful conclusion that would support consent.

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the assessment of social impacts, health, and wellbeing is critical and has severe implications for the evaluation process. The developer has commissioned a Social Impact Assessment that included focus groups with local residents, yet the full report remains unpublished. This failure to disclose vital information creates a significant evidential gap, preventing both the public and the competent authority from understanding the complete range of social risks highlighted by the developer's own research.

Available summaries show that residents are already facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are grounded in direct engagement and are not based on speculation. However, the lack of access to the full assessment hinders proper scrutiny of these findings, limiting the capacity to assess their importance in the decision-making

process.

Moreover, evidence indicates that the proposal is viewed as a direct threat to community identity and cohesion, with findings pointing to a potential "cultural loss." Yet, these impacts have not been adequately incorporated into the primary application nor given the necessary consideration. The withholding of the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

This absence of transparency severely undermines the Environmental Impact Assessment process. It is crucial to have a complete understanding of the social, economic, and health implications for developments of this magnitude, especially when community character and function may be at stake. Without the full dataset, the application does not provide a comprehensive evidential basis for weighing the benefits against the potential harm.

From a policy standpoint, the application is unable to demonstrate its compliance with National Planning Framework 4 concerning health and wellbeing. Developments must contribute to positive health outcomes and mitigate harm, yet the evidence currently available suggests existing adverse effects that remain undisclosed. In light of the absence of the complete assessment, compliance with this policy is unprovable.

The procedural ramifications are significant, as the competent authority cannot conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This omission represents a material flaw within the application and a failure to meet the evidential standards mandated by the Environmental Impact Assessment regime.

In summary, the combination of the non-disclosure of the full Social Impact Assessment and evidence of current adverse impacts renders the assessment incomplete and unreliable. This situation obstructs a lawful determination and reinforces the view that the application lacks adequate supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts related to the proposed turbines is fundamentally inadequate, failing to capture the scale of change and the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by its unspoiled Atlantic horizon, undeveloped nature, and a profound sense of remoteness. The proposed large-scale turbines, positioned near the shoreline, would establish a persistent industrial presence that would irrevocably alter this character and lead to a permanent transformation of the landscape.

Furthermore, the application does not accurately depict the extent of this visual change. The size and proximity of the turbines would dominate views from local residential areas, historical sites, and popular coastal locations. This would significantly affect visual amenity and undermine the landscape's defining features of

naturalness and remoteness. The assessment fails to properly articulate the significance of these impacts within such a sensitive landscape.

There are serious methodological flaws in how visual viewpoints have been selected and presented. Evidence indicates that these viewpoints may not adequately reflect the most sensitive receptors or the worst-case scenarios, particularly concerning critical cultural heritage sites and high-value landscapes. This raises concerns that the true magnitude of visual impact has been downplayed, compromising the assessment's reliability.

Additionally, there is a notable failure to consider the interconnectedness between landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape, linked visually and spatially to the Atlantic horizon. The assessment treats these heritage assets in isolation, ignoring their interdependence, which leads to an incomplete understanding of how the proposal will impact their setting and cultural significance.

The industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are appreciated and severing their ties to the natural horizon. This is not merely a visual issue; it represents a wider cultural and spatial detriment that has not been properly evaluated in the application.

From a policy perspective, the proposal stands in direct conflict with National Planning Framework 4, which aims to protect natural environments and historical assets. The scale of the proposed change fails to meet the necessity of preserving landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case scenario assessment further undermines any assertion of compliance with policy.

Moreover, it is evident that the impacts noted cannot be effectively mitigated. Given the height, scale, and proximity of the turbines, their presence would be imposing and inescapable. The anticipated changes are therefore fundamental and permanent, rather than amenable to acceptable levels of mitigation.

In summary, the assessment does not accurately reflect the magnitude of impact, the sensitivity of the environment, or the interrelated nature of landscape and heritage. These shortcomings preclude a dependable evaluation and affirm the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

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

evaluation of their adequacy or effectiveness.

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

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

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

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

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and a thriving fishing industry. However, the assessment of fisheries and marine life within the application is inadequate and lacks a thorough evaluation of both ecological and socio-economic impacts. It fails to demonstrate that these critical uses and habitats can be safeguarded without substantial disruption.

One major concern is the assumption that fishing activities can be displaced without repercussions. The application does not provide any evidence indicating that there are alternative fishing grounds that are accessible and able to bear the additional pressure. This gap in information is crucial, as the potential for displacement risks overfishing in other areas, which could lead to broader economic ramifications for the local fishing

fleet. Without a solid, evidence-based assessment, the repercussions for fisheries and local livelihoods remain unclear.

Furthermore, the proposal presents significant risks to marine species, particularly due to underwater noise created during construction activities. The use of high-energy hammer piling over an extended duration is expected to disturb marine life across considerable distances, notably affecting species such as dolphins. The predicted impact on a significant portion of the local bottlenose dolphin population is alarming; nonetheless, the application minimizes the importance of these effects without adequate evidence to support such claims.

There is a clear contradiction within the application regarding the requirement for licences to permit harm to European Protected Species, while simultaneously categorising impacts as negligible. This inconsistency undermines the assessment's credibility and raises concerns about adherence to the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

Additionally, the assessment neglects to address the cumulative impacts arising from various pressures, including habitat disturbance, noise, and the displacement of fishing activity. 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 falls short of demonstrating compliance with the National Planning Framework 4 or the National Marine Plan. It does not adequately show that the proposed development can coexist with current marine users or that it can avoid unacceptable impacts on marine biodiversity. This lack of clarity prevents any conclusion that the proposal is sustainable.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The omission of assessments regarding dark skies and nocturnal wildlife represents a significant gap in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are crucial for the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting that can be seen over long distances would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

The proposal fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This is particularly concerning given the vital role that dark skies play in the area's identity and the growth

of emerging tourism sectors such as astro-tourism. The lack of consideration for these impacts creates a clear gap in the overall landscape and environmental assessment.

Moreover, there is no analysis of the impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to phototaxis, which can lead to disorientation and increased collision risks. The application lacks a lighting impact assessment or a phototaxis study, failing to address how aviation lighting may affect these species or contribute to increased mortality rates.

This issue is exacerbated by the reliance on daytime survey data for the ornithological assessment, which does not adequately capture nocturnal activity or related risks. Other species, such as Kittiwakes, that may forage or migrate at night are also at risk of disorientation from artificial lighting, yet this has not been evaluated. The absence of site-specific night-time data hinders the understanding of ecological impacts.

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

From a policy standpoint, these omissions contradict the National Planning Framework 4 regarding the protection of natural spaces and environmental quality. They also weaken the broader assessment of landscape and seascape impacts since the character of night-time forms an essential element of the environment.

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

TOURISM

The economic contribution of tourism to the Isle of Lewis is significant, 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 growth, the assessment of tourism impacts related to the proposed development is materially deficient. The application acknowledges that 86% of visitors are attracted by the area's scenery, yet it does not provide a quantified assessment of how large-scale offshore infrastructure might affect visitor numbers, behaviour, or the overall economic contribution of tourism.

Furthermore, the assessment fails to consider the critical role that environmental quality plays in supporting tourism. The importance of unspoiled landscapes and dark skies to the visitor experience, as well as to emerging markets such as nature-based tourism and astro-tourism, has not been adequately evaluated. The lack of a Dark Skies Assessment further exacerbates this issue, leaving a significant gap in understanding

the potential impacts on a growing segment of the local economy.

In an island community with limited economic diversification, the neglect of tourism impact assessments has broader implications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been properly evaluated in accordance with the Islands (Scotland) Act 2018.

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

In summary, 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 lack of thorough analysis undermines the ability to robustly evaluate economic effects and suggests that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm exemplifies a significant failure to meet the standards of sustainable development as mandated by statutory duties and national policy. It mirrors the core problems that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Despite the current application being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it still falls short.

Crucially, the application lacks a comprehensive and reliable evidential basis. It contains significant gaps in baseline data, utilises an undefined design envelope, and depends on unspecified mitigation measures. Additionally, it omits vital impact pathways, including nocturnal wildlife, the full scope of onshore infrastructure, and the implications for tourism. Consequently, the Environmental Impact Assessment is insufficient, leaving the potential significant effects and residual impacts inadequately understood.

There are also evident procedural shortcomings. The failure to provide a compliant Island Communities Impact Assessment violates statutory duties under the Islands (Scotland) Act 2018, while the omission of a complete Social Impact Assessment constitutes a critical gap. These issues hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

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

Furthermore, it fails to show a net economic benefit because of the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been thoroughly evaluated, thus obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertainties persist regarding environmental risks, which could be significant. The assessments pertaining to marine ecology, seabirds, protected species, and marine mammals are incomplete and occasionally inconsistent. The evidential threshold necessary to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, which invokes the precautionary principle and prevents a lawful conclusion regarding acceptable impacts.

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

In summary, the application is procedurally and substantively unfit for determination. The myriad information deficiencies, paired with conflicts in policy and unresolved environmental risks, obstruct any lawful and evidence-based decision-making. The competent authority must therefore refuse consent on these grounds or invoke the relevant regulatory provisions to mandate the submission of the outstanding information.

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

Additional Comments

This development needs to be stopped immediately.

It is not good for the people, nature or the environment. It will be destructive to all of the above.

The beauty and serenity of the Highlands and islands is being sacrificed to provide power to the cities and the mainland.

This is destructive capitalism in its worst form.

These windfarms should be built far out to sea and near major cities, and not in areas of natural beauty such as the west coast Highlands and islands!

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: 504EB418

Member of the public 1412

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted within the relevant marine licensing and Environmental Impact Assessment frameworks. The development is situated off the west side of the Isle of Lewis, an area known for its stunning Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. Concerns regarding the scale, proximity, and design of the proposal highlight its incompatibility with statutory requirements, national policy, and the principles of sustainable development.

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is significantly lacking and fails to provide a complete, transparent, or reliable account of the potential environmental effects associated with the proposal. The adoption of a flexible Project Design

Envelope, without fixed commitments to specific turbine dimensions, layouts, or configurations, creates substantial uncertainty and hampers the ability to apply a worst-case scenario consistently. This situation undermines the integrity of the assessment, obscuring the true extent of environmental effects from both the public and the competent authority.

The application significantly depends on mitigation measures, monitoring strategies, and management plans that are yet to be defined. Consequently, consent is sought on the premise that environmental harm will be mitigated at a later stage, which obstructs any meaningful evaluation of effectiveness or assessment of residual impacts. This postponement of critical information to post-consent phases is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be established clearly prior to determination.

Furthermore, there are notable evidential shortcomings, including insufficient baseline data, methodological limitations, and an over-reliance on assumptions in lieu of site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are made without robust supporting data. The lack of sufficient information inhibits a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot align with statutory requirements.

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

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

ASSESSMENT OF ALTERNATIVES

The application does not provide a structured, evidence-based assessment of alternatives as required by the Environmental Impact Assessment regime. Instead, it presents a narrative of project evolution, lacking a reasoned comparison of realistic alternatives based on environmental effects. This failure to identify, assess, and prefer less harmful options over more damaging solutions is a significant oversight.

There is also no transparent examination of alternative offshore locations, development

scales, or design configurations. Specifically, the application does not show that the developer has seriously considered positioning turbines further offshore, where there would likely be a reduction in visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline, along with the crucial role of proximity to shore in determining impact, means that the lack of this analysis prevents a conclusion that the proposed site is indeed the least damaging option.

The deficiencies extend to the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been adequately explored to mitigate impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The absence of a clear avoidance strategy, alongside a lack of comparative analysis, suggests that mitigation by design has not been employed, leading to reliance on post-design mitigation measures instead.

Consequently, the application fails to show that environmental harm has been minimised through proper site selection, layout, and infrastructure routing. This represents a breach of the established mitigation hierarchy and hinders the competent authority's ability to ascertain whether more appropriate and less harmful alternatives are available. Without a thorough assessment of alternatives, it cannot be determined that the proposal is a sustainable or compliant solution in line with policy requirements.

From a policy standpoint, this deficiency calls into question compliance with National Planning Framework 4, particularly concerning the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a material omission that contributes to the conclusion that the application has not been properly evaluated and cannot justify a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species lacks completeness and reliability, failing to provide a full understanding of the ecological receptors in the West Lewis coastal environment. This area is sensitive and biologically active, yet the baseline data remains inadequate. The methodologies used do not effectively capture the presence, behaviour, and habitat use of species in this marine system. Consequently, the assessment does not establish a solid evidential basis for impact evaluation.

A significant shortcoming is the omission of otters, which are a European Protected Species. The application does not adequately recognise their active foraging and movement within coastal areas. By neglecting their core foraging range and behavioural patterns, the potential impacts of construction disturbance, noise, and increased activity have not been properly assessed. This lack of assessment undermines conclusions regarding the absence of significant effects on otters.

The assessment of basking sharks also exhibits deficiencies, particularly due to reliance on aerial surveys that introduce considerable detection bias, especially under

Atlantic conditions. This approach likely leads to an underestimation of their presence, especially when compared to established land-based observations indicating frequent use of these waters. The failure to include or appropriately consider such data results in an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological flaws mean that the conclusions of negligible or non-significant effects are based on assumptions rather than solid evidence. The insufficient baseline data limits the ability to meaningfully assess cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty regarding the actual level of risk to marine species and habitats.

From a regulatory standpoint, the application does not comply with the Environmental Impact Assessment requirements and National Planning Framework 4, as it has not properly identified or assessed protected species. The uncertainty introduced means that adverse effects cannot be excluded beyond reasonable scientific doubt, engaging the precautionary principle. Therefore, consent cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These issues hinder a robust evaluation of the impacts on marine ecology and protected species and highlight that the application does not have a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application has significant flaws that raise serious concerns. It is clear that the west coast of the Isle of Lewis hosts internationally important seabird populations, many of which are already in decline. However, the application fails to provide sufficient evidence that these species will not be adversely affected. The proposed development is situated within crucial foraging areas and migratory pathways, yet the implications of potential displacement, collision risk, and habitat loss have not been adequately evaluated.

A major inconsistency within the application arises when the developer concludes that there will be no significant adverse effects while simultaneously presenting a Habitats Regulations derogation case, which is typically only necessary if significant harm is anticipated. This contradiction undermines the reliability of the assessment and suggests that the conclusions drawn are not backed by the underlying evidence. Furthermore, the assessment lacks adequate evidence to demonstrate that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The critical nature of these feeding grounds has not been fully acknowledged, and the reliance on modelling approaches introduces uncertainty, especially regarding species in severe decline, including Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, particularly when baseline data is lacking and behavioural responses are not fully understood.

Placing turbines within a recognised migratory corridor poses a further significant risk, as it effectively creates a barrier in a primary flight path that species use to travel

between the United Kingdom and Iceland. The application does not sufficiently assess the long-term consequences of continued mortality in this corridor or the potential impact on species with relatively small global populations.

From a regulatory standpoint, the application does not meet the necessary evidential threshold to conclude that there will be no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, coupled with gaps in data and limitations in modelling, means that the standard of beyond reasonable scientific doubt has not been achieved. This triggers the precautionary principle and prevents a lawful conclusion in favour of consent.

The identified deficiencies also indicate a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places this proposal directly at odds with national policy. Overall, the assessment is unreliable due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. These shortcomings hinder a thorough evaluation of impacts and lead to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline represents a vibrant cultural landscape where environment, language, tradition, and community are interconnected. The assessment of cultural heritage and community identity within the application fails fundamentally, as it adopts a reductive approach by treating heritage as a collection of isolated and static assets. This perspective neglects the ongoing social, cultural, and spiritual roles that these elements play 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 merely characterised as static features within the assessment. This mischaracterisation ignores their ongoing use, significance, and the potential impact of development on their surrounding environments. Consequently, the evaluation of cultural effects remains incomplete, and the essential role these sites hold within community life is disregarded.

The assessment further fails to account for intangible cultural heritage, which includes vital components such as the Gaelic language, traditions, and the long-standing relationship between the community and the coastal environment. These aspects are central to the identity of the area, yet they are completely omitted from the assessment, leading to a significant gap in understanding the cultural impact of the proposed development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population possesses a distinctive cultural identity and is recognised as an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of

meaningful engagement undermines the legitimacy of the assessment and does not align with established principles regarding participation in decisions that affect cultural and environmental interests.

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

From a policy standpoint, these deficiencies conflict directly with the National Planning Framework 4, particularly regarding the protection of historic assets and places. The neglect to consider both tangible and intangible heritage, alongside the failure to recognise living cultural practices, represents a departure from policy requirements.

When viewed collectively, the shortcomings in assessing living heritage, intangible cultural value, community rights, and statutory obligations culminate in a substantial evidential gap. The cultural impacts of the proposed development have not been adequately assessed, leaving the application insufficient for evaluating the true cultural cost involved.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The transparency and comprehensiveness of the assessment regarding social impacts, health, and wellbeing associated with the proposed development are critically lacking. Although the developer has commissioned a Social Impact Assessment that included focus group discussions with local residents, the failure to publish the complete report leads to a significant evidential gap. This lack of disclosure hinders both public understanding and the competent authority's ability to evaluate the potential social risks highlighted in the developer's own findings.

Residents are experiencing measurable stress, anxiety, and concern tied to the size and proximity of the proposal, as indicated by available summaries. These impacts arise from direct community engagement and are not speculative. The absence of the full assessment restricts proper scrutiny of these findings, limiting their significance in the decision-making process.

Moreover, the proposal is viewed as a threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. However, these critical impacts have not been adequately reflected in the main application or given appropriate consideration. The withholding of the complete Social Impact Assessment obscures the genuine human and social costs associated with the development.

This lack of transparency further undermines the Environmental Impact Assessment process. For developments of this magnitude, a thorough understanding of the social, economic, and health implications is vital, especially when the character and functioning of the community may be at stake. Without providing the complete dataset,

the application fails to establish a comprehensive evidential basis necessary for weighing the benefits against potential harms.

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 mitigate harm; however, the evidence currently available indicates pre-existing adverse effects that have not been fully disclosed. Without the complete assessment, compliance with this policy remains unproven.

The procedural ramifications are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment, which constitutes a material omission and a failure to meet the evidential standards required by the Environmental Impact Assessment framework.

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

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 lack of defined mitigation measures and detailed management plans significantly hampers the assessment of construction and pollution risks associated with this proposal. There is a serious deficiency in the information provided to evaluate the likely environmental effects, particularly given the sensitivity of the receiving environment. The coastline of West Lewis is home to clean coastal waters and vital habitats that are at risk from sediment disturbance and contamination, yet the application does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans.

Although the application acknowledges potential risks, such as sediment mobilisation and accidental chemical or oil spills, it fails to detail how these risks will be prevented, controlled, or monitored. This absence of clear strategies leaves a troubling uncertainty regarding the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. Without comprehensive modelling and management strategies in place, it is impossible to ascertain the extent, duration, or ecological implications of these impacts on marine species and habitats already identified as sensitive in the broader assessment.

Compounding these concerns is the lack of detailed emergency response procedures.

By postponing contingency planning until after consent has been granted, the application denies proper evaluation of whether sufficient safeguards are established to address potential pollution events. This approach not only introduces procedural risk but also undermines the competent authority's ability to assess environmental protection measures during the determination process.

From a regulatory standpoint, deferring crucial environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. Significant effects and appropriate mitigation must be evaluated before consent is issued, and the absence of this information means a lawful determination cannot be achieved. Furthermore, the application does not demonstrate compliance with policy requirements regarding environmental protection and water quality.

Overall, the failure to provide a robust assessment of construction and pollution risks, combined with the lack of clarity on potential impacts, renders the assessment materially deficient and supports the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry. However, the application fails to provide a thorough evaluation of the ecological and socio-economic impacts associated with the proposal. There is a pressing concern regarding the assumption that fishing activities can be displaced without any consequences. The lack of evidence demonstrating that alternative fishing grounds are available and able to support additional pressure is particularly concerning. This oversight could lead to overfishing in other areas, impacting the livelihoods of the local fishing fleet.

Moreover, the proposal poses significant risks to marine species, especially through the underwater noise generated during construction. The use of high-energy hammer piling over a prolonged period is likely to disturb marine life across large distances, affecting species such as dolphins. The predicted impact on a substantial portion of the local bottlenose dolphin population raises serious alarms, yet the application tends to downplay the significance of these effects, lacking sufficient supporting evidence.

Inconsistencies within the application further undermine its credibility. While it acknowledges the need for licences to permit harm to European Protected Species, it simultaneously describes these impacts as negligible. This contradiction raises serious concerns regarding compliance with the Habitats Regulations, particularly in instances where harm is anticipated to a level requiring legal authorisation.

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

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

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 precluding any conclusion that the proposal represents sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is incomplete and does not fully consider the impacts associated with what constitutes a single integrated project. The offshore turbines are intrinsically linked to the onshore works, yet these elements are assessed separately, leading to a fragmented approach that obscures the comprehensive scale of environmental and socio-economic effects.

The onshore components encompass cabling across protected moorland, the construction of a substation near Stornoway, and the necessary access infrastructure that traverses sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which is a vital carbon store and ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By deferring the assessment of onshore impacts, the application obstructs the evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all project components are examined in tandem; however, the separation of offshore and onshore elements leads to a lack of clarity regarding the combined effects on peatlands, habitats, and local communities.

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal introduces permanent red aviation lighting that will be visible over long distances. This creates a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment. The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism value.

There is a significant absence of assessment regarding the impact of this lighting on visual amenity, landscape character, and the experiences of residents and visitors. This gap is particularly notable given the growing importance of dark skies to local identity and emerging sectors such as astro-tourism. The Environmental Impact Assessment does not evaluate how the proposed lighting may affect these crucial aspects.

Equally concerning is the lack of evaluation regarding impacts on nocturnal wildlife. Several species, including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, are highly sensitive to artificial lighting, which can cause disorientation and increase collision risks. The application does not provide a lighting impact assessment or phototaxis study, meaning it fails to consider how the proposed aviation lighting could affect these species or contribute to increased mortality.

Moreover, the reliance on daytime survey data in the ornithological assessment fails to capture nocturnal activity and related risks. Species such as Kittiwakes, which may forage or migrate at night, are also vulnerable to disorientation due to artificial lighting, yet this risk has not been examined. The lack of site-specific night-time data creates a crucial gap in understanding potential ecological impacts.

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

From a policy standpoint, this omission contradicts National Planning Framework 4 concerning the protection of natural places and environmental quality. It undermines the overall evaluation of landscape and seascape impacts since the night-time character is an integral aspect of the environment.

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 renders the application incomplete and incapable of supporting a lawful determination.

TOURISM

The Isle of Lewis tourism sector, which has seen growth from £65 million in 2017 to over £81.5 million, is critical to the local economy, supporting more than 1,000 jobs and representing up to 16% of the island's economy. The application under review does not adequately assess the economic and social impacts that could arise from large-scale offshore infrastructure development, which could threaten this vital sector. Despite recognising that 86% of visitors are attracted by the area's stunning scenery, the assessment does not quantify how this proposed industrialisation would affect visitor numbers, their behaviour, or the overall economic contribution of tourism.

Additionally, the assessment neglects to evaluate how the environmental quality crucial to tourism, such as unspoiled landscapes and dark skies, may be compromised. This oversight is particularly concerning given the importance of these factors for the growing fields of nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment further highlights the deficiencies in the evaluation, leaving a notable gap in understanding the potential impacts on a vital part of the local economy.

In an island community with limited economic diversification, the lack of consideration for tourism impacts carries broader implications for employment, local businesses, and the sustainability of communities. Furthermore, the failure to conduct an Island Communities Impact Assessment as mandated by the Islands (Scotland) Act 2018 means that these economic vulnerabilities have not been appropriately evaluated.

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

Overall, the lack of quantification of tourism impacts, the failure to evaluate environmental factors influencing visitor behaviour, and the disregard for the island's economic dependence create a substantial evidential gap. This gap undermines any robust evaluation of the economic effects and reinforces the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm presents significant shortcomings that undermine sustainable development, failing to meet the necessary statutory duties and national policy requirements. The project mirrors the core issues of the 2008 Lewis Wind Power proposal, which was previously denied due to unacceptable levels of industrialisation. Despite being submitted under an updated policy framework that emphasises biodiversity, peatland conservation, landscape preservation, and community wellbeing, the proposal still falls short.

Critical gaps in the evidence base are evident, particularly concerning baseline data and the reliance on an undefined design envelope. The proposal includes unspecified mitigation measures and omits key impacts such as those on nocturnal wildlife, the full extent of onshore infrastructure, and potential effects on tourism. As a result, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of significant effects or residual impacts.

Moreover, procedural deficiencies abound. The lack of a compliant Island Communities Impact Assessment is a breach of the Islands (Scotland) Act 2018, and the non-disclosure of a full Social Impact Assessment constitutes a serious omission. These gaps hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal conflicts with National Planning Framework 4, lacking evidence of biodiversity protection, safeguarding natural areas and cultural heritage, and failing to demonstrate acceptable health and wellbeing impacts. It does not provide any proof of net economic benefit due to the absence of tourism impact modelling. Furthermore, the cumulative effects of both offshore and onshore components have not been properly evaluated, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks are not only uncertain but potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The application does not meet the evidential threshold required to exclude adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle and precluding a lawful conclusion regarding acceptable impacts.

The proposal is set to cause extensive and irreversible changes to a particularly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, and the disruption of cultural and visual relationships, along with the negative repercussions on tourism, represent permanent effects that cannot be sufficiently mitigated.

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

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

Additional Comments

1. Significant Environmental Impact
The development raises serious concerns regarding its impact on marine ecosystems. The construction and operation of offshore turbines, associated cabling, and increased vessel traffic risk disrupting sensitive habitats, including fish spawning grounds and migratory routes for marine mammals. There is insufficient evidence that these impacts can be fully mitigated.

2. Harm to Coastal and Seascape Character
The scale and visibility of the proposed turbines would fundamentally alter the natural character of the coastline and seascape. This area is valued for its unspoiled views, and the industrialisation of the horizon would result in a permanent and unacceptable visual intrusion.

3. Impact on Tourism and Local Economy
Tourism in the region is closely tied to its natural beauty and tranquil environment. The presence of a large offshore wind farm risks deterring visitors, potentially harming local businesses that rely on tourism and hospitality.

4. Concerns Over Infrastructure and Disruption
The onshore infrastructure required—including substations, cable landfalls, and road access—would cause disruption during construction and could lead to long-term changes in land use. The cumulative impact on local communities has not been adequately addressed.

5. Lack of Meaningful Community Engagement
There appears to be a lack of transparent and meaningful consultation with local residents. Communities directly affected by this proposal should have a stronger voice in decision-making, and it is not clear that their concerns have been fully considered.

6. Precedent for Further Industrialisation
Approval of this project could set a precedent for additional large-scale developments in the area, leading to incremental industrialisation of the marine and coastal environment.

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: 228EA748

Member of the public 1413

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

Dear Sir/Madam

This document serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted pursuant to marine licensing and Environmental Impact Assessment regulations. A thorough review of the Environmental Impact Assessment Report and accompanying documentation reveals significant deficiencies across material planning, environmental, cultural, and procedural dimensions. The proposed development, situated off the west side of the Isle of Lewis, is characterised by an Atlantic-facing coastline, a largely untouched environment, and a rich cultural identity. Concerns arise from the scale, proximity, and design of the project, which may not align with statutory requirements, national policy, and sustainable development principles.

The application does not furnish a sufficient evidential basis necessary for a lawful determination. There is a notable absence of critical environmental data, while baseline information is both limited and inconsistent. Key elements of the proposal remain undefined. Furthermore, the adoption of a flexible design framework complicates the assessment of potential significant effects, and the reliance on unspecified mitigation measures renders an evaluation of their efficacy impossible. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust supporting evidence.

Substantial policy conflicts are evident, as the proposal is seemingly at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This inconsistency particularly pertains to biodiversity, natural environments, cultural heritage, and public health and wellbeing. The application does not satisfactorily demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests required for consent and hinder the competent authority's ability to deem the development acceptable in policy terms.

The unprecedented scale of the proposal, featuring large turbines located close to the shoreline, raises significant issues related to landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, dependence on undefined mitigation strategies, evidential deficiencies, and clear non-compliance with policy demonstrates that the application is incomplete and cannot substantiate a lawful determination. In light of these factors, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and fails to provide a transparent and reliable account of the environmental effects associated with the proposal. A flexible Project Design Envelope has been employed, which does not commit to specific turbine dimensions, layouts, or configurations. This approach introduces considerable uncertainty and hinders the consistent application of a worst-case scenario, undermining the integrity of the assessment. As a result, the impacts described may not accurately reflect the actual development that is ultimately constructed, leading to a failure to inform the public and the competent authority about the true extent of environmental effects.

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The 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 application presents an assessment of marine ecology and protected species that is fundamentally flawed and fails to deliver a comprehensive understanding of the ecological receptors within the West Lewis coastal environment. This area is known for its biological activity and sensitivity, yet the baseline data provided is incomplete, and the methodologies employed do not adequately capture species presence, behaviour, and habitat utilisation. Consequently, the assessment lacks a solid evidential foundation to evaluate potential impacts effectively.

Notably, the assessment neglects to properly acknowledge the presence of otters, which are classified as a European Protected Species. It fails to assess their active usage of coastal areas for foraging and movement. This oversight regarding their core

foraging range and behavioural patterns results in an inadequate evaluation of potential impacts stemming from construction disturbances, noise, and increased activity. Such omissions compromise the conclusions drawn about the absence of significant effects on this species.

Further shortcomings are evident in the evaluation of basking sharks, which suffers from a reliance on aerial surveys that introduce considerable detection bias, particularly in challenging Atlantic conditions. This methodology is likely to significantly underestimate the presence of basking sharks when compared to established land-based observations that demonstrate frequent utilisation of these waters. The lack of integration or thorough consideration of such pertinent data leads to an incomplete baseline and diminishes the reliability of the conclusions reached.

These methodological shortcomings give rise to conclusions about negligible or non-significant effects that rest on assumptions rather than rigorous evidence. The inadequacy of baseline data also hampers the ability to assess cumulative and indirect impacts meaningfully, including those stemming from seasonal variations and broader ecosystem interactions. This situation generates uncertainty regarding the real extent of risks posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it has not adequately identified or assessed protected species. The uncertainty introduced by these deficiencies hinders the ability to exclude adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. In light of these issues, granting consent would not be lawful.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment as a whole unreliable. These inadequacies obstruct a thorough evaluation of impacts on marine ecology and protected species, affirming that the application lacks a sufficient evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the ornithological impacts is fundamentally flawed, exhibiting significant gaps in evidence and internal inconsistencies that undermine its conclusions. The development site is situated in key 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 convincingly demonstrate that these species will not be adversely affected. It does not adequately evaluate the risks associated with displacement, collision, or habitat loss for these birds.

There exists a fundamental contradiction within the application, as the developer claims there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment

and suggests that the presented conclusions lack support from the underlying evidence. Furthermore, the assessment does not sufficiently address the potential impacts on seabirds linked to protected sites such as the Lewis Peatlands and St Kilda. It does not fully consider the importance of their feeding grounds, and the reliance on modelling approaches adds a layer of uncertainty, particularly concerning species like Kittiwakes and Fulmars that are in severe decline. The methodologies used appear likely to underestimate mortality, especially where baseline data is inadequate and the behavioural responses of the birds are not thoroughly understood.

The placement of turbines within a recognised migratory corridor introduces additional significant risks, creating a barrier within a primary flight path utilized by species travelling between the United Kingdom and Iceland. The application does not sufficiently assess the long-term implications of sustained mortality in this corridor or the potential effects on species that have 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 effect on the integrity of protected sites. The presence of contradictory conclusions, combined with gaps in data and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This situation engages the precautionary principle and prevents a lawful conclusion in favour of consent.

Additionally, the identified deficiencies reflect a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will remain unaffected 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 shortcomings obstruct a robust evaluation of potential impacts and lead to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is fundamentally flawed, notably neglecting the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are interconnected. Rather than recognising heritage as a living element that serves ongoing social, cultural, and spiritual purposes within the community, the application presents it as a collection of isolated, static assets.

There is a critical shortcoming in the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are active locations for burial and spiritual practices, yet the assessment views them merely as static features. This oversight fails to consider their continued use and meaning, as well as the potential impact of development on their settings. Consequently, the evaluation of cultural effects remains incomplete and overlooks their importance to community life.

Moreover, the application neglects to address intangible cultural heritage elements, including the Gaelic language and traditions, which are central to the identity of the area. The long-standing relationship between the community and the coastal environment is completely disregarded in the assessment, representing a major omission. Without these considerations, the cultural implications of the development cannot be accurately understood.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population possesses a unique cultural identity akin to that of an Indigenous People, yet no process of Free, Prior and Informed Consent has been pursued. The lack of meaningful engagement calls into question the legitimacy of the assessment and fails to adhere to established principles of participation in decisions impacting cultural and environmental interests.

Furthermore, there is a critical procedural oversight in the absence of a compliant Island Communities Impact Assessment, as mandated by the Islands (Scotland) Act 2018. This omission prevents the competent authority from meeting its legal obligation to evaluate the social, cultural, and economic impacts on the island community, thus hindering a lawful determination.

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

In summary, the failure to assess living heritage, intangible cultural values, community rights, and statutory obligations has resulted in a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, leaving the application insufficient for determining the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The social impacts, health, and wellbeing assessment associated with this proposal is significantly deficient and lacks the necessary transparency for a lawful evaluation. Although the developer commissioned a Social Impact Assessment that included focus groups with local residents, the complete report has not been published. This lack of disclosure creates a substantial evidential gap, making it impossible for both the public and the competent authority to grasp the full extent of the social risks identified in the developer's own research.

Reports indicate that local residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts arise from direct engagement with the community and are therefore factual rather than speculative. The failure to make the full assessment available stifles proper scrutiny of the findings, thus limiting the capacity to evaluate their significance in the decision-

making process.

Furthermore, there is evidence suggesting that the proposal is seen as a direct threat to community identity and cohesion, with “cultural loss” noted within the developer’s findings. However, these serious impacts have not been adequately incorporated into the main application, nor have they been afforded appropriate consideration. The withholding of the comprehensive Social Impact Assessment conceals the genuine human and social costs associated with the development.

This lack of transparency is detrimental to the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functionality may be at stake. By not providing the complete dataset, the application fails to supply a comprehensive evidential basis needed to assess the balance between benefits and harms.

From a policy standpoint, the application does not meet the requirements of the National Planning Framework 4 concerning health and wellbeing. Development is expected to promote positive health outcomes and minimise harm; however, the available evidence reveals existing adverse effects that have not been fully disclosed. Without the complete assessment, compliance with this policy remains unproven.

The procedural implications of this situation are considerable. The competent authority is unable to perform a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a material omission within the application, which fails to satisfy the evidential requirements of the Environmental Impact Assessment framework.

In summary, the non-disclosure of the complete Social Impact Assessment, coupled with evidence of existing negative impacts, results in an incomplete and unreliable assessment. This failure obstructs a lawful determination and underscores the conclusion that the application lacks sufficient information to warrant approval.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of the potential impacts on the seascape, landscape, and visual environment is significantly lacking and does not reflect the true scale of change nor the sensitivity of the area affected. The character of the West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and strong sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the shoreline would result in a continuous and overwhelming industrial presence, fundamentally changing this character and leading to a permanent and irreversible transformation of the landscape.

Moreover, the application fails to adequately depict the extent of the anticipated visual changes. Given the scale and proximity of the turbines, they would overshadow views from residential areas, historic sites, and popular coastal locations. This would directly

diminish visual amenity and compromise the essential qualities of naturalness and remoteness. The assessment does not sufficiently illustrate this impact or its significance within the context of such a sensitive landscape.

Concerns also arise from the methodology employed in the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints may not accurately represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the true magnitude of the visual impact has been underestimated, casting doubt on the reliability of the assessment.

A critical shortcoming is the lack of analysis regarding the interconnected relationship between the landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting connected visually and spatially to the Atlantic horizon. The assessment fails to acknowledge their interdependence, treating these heritage sites as isolated entities, which results in an incomplete assessment of the impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are perceived and severing their connection to the natural horizon. This represents a visual impact along with broader cultural and spatial damage that has not been thoroughly assessed in the application.

From a policy standpoint, the proposal directly contradicts the principles outlined in National Planning Framework 4 regarding the safeguarding of natural areas and historic assets. The extent of change posed by the project is incompatible with the necessity to protect landscape character, visual amenity, and the setting of culturally significant sites. The lack of a comprehensive worst-case scenario assessment further undermines any assertion of policy conformity.

It is evident that the impacts identified cannot be suitably mitigated. Due to the scale, height, and proximity of the turbines, their presence would be prominent and unavoidable. Thus, the resulting change is fundamental and permanent, incapable of being diminished to an acceptable level through any form of mitigation.

Collectively, the assessment inadequately represents the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings obstruct a reliable evaluation and reinforce the conclusion that the proposal is at odds with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The absence of detailed management plans, along with undefined mitigation measures, renders the assessment of construction and pollution risks materially deficient. The proposal involves significant seabed preparation and installation activities within a high-energy Atlantic environment, yet there are no comprehensive Construction

Environmental Management Plans or Pollution Prevention Plans included. Instead, the application relies on future mitigation and contingency measures to be formulated post-consent, which hinders any meaningful evaluation of their adequacy or effectiveness.

This reliance on unspecified future actions is particularly concerning given the sensitivity of the receiving environment. The West Lewis coastline, known for its clean coastal waters and important habitats, is vulnerable to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on preventative, control, or monitoring measures for these risks.

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

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent is granted, the application obstructs the evaluation of whether suitable safeguards are established to address pollution incidents. This not only introduces procedural risk but also undermines the ability of the competent authority to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. Significant effects and proposed mitigation measures must be assessed prior to consent; the absence of such information precludes a lawful determination. Furthermore, the application does not demonstrate compliance with policy requirements pertaining to environmental protection and water quality.

In summary, the deficiencies noted in the application—the lack of defined mitigation measures, insufficient detail in management plans, and uncertainty surrounding potential impacts—strongly indicate that a robust evaluation of construction and pollution risks is not feasible, leading to the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents significant deficiencies in its assessment of fisheries and marine life, failing to offer a robust evaluation of ecological and socio-economic impacts. 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 adequately demonstrate how these uses and habitats can be safeguarded or maintained without considerable disruption.

A critical flaw lies in the assumption that fishing activity can be displaced without repercussions. The application lacks evidence to confirm that alternative fishing grounds are not only available but also accessible and capable of bearing additional pressures. This significant omission raises the risk of overfishing in other areas, which could lead to broader economic consequences for the local fishing fleet. Consequently, without a clear and evidence-based assessment, understanding the impacts on fisheries and local livelihoods is impossible.

Moreover, the proposal poses considerable risks to marine species, especially through the underwater noise produced during construction. The use of high-energy hammer piling over prolonged periods is likely to disturb marine life over large distances, notably affecting species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is alarming; yet, the application minimises these effects without adequate supporting evidence.

There is also a troubling inconsistency in the application regarding the acknowledgment of the need for licences to permit harm to European Protected Species, while simultaneously asserting that the impacts are negligible. This contradiction undermines the credibility of the assessment and raises serious questions about compliance with the Habitats Regulations, particularly where anticipated harm necessitates legal authorisation.

Additionally, the assessment neglects to consider cumulative impacts stemming from various pressures, including habitat disturbance, noise, and the displacement of fishing activity. Without a thorough evaluation of these combined effects, it is impossible to determine the overall impact on 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 existing marine users or avoid unacceptable impacts on marine biodiversity, thus obstructing any conclusion that the proposal aligns with the principles of sustainable development.

In summary, the absence of evidence on fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies ultimately render the assessment incomplete and unreliable. These shortcomings prevent any meaningful evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the proposed infrastructure is significantly deficient, failing to acknowledge the comprehensive impacts stemming from a project that is fundamentally integrated. The offshore turbines are interconnected with the onshore operations, yet the two are evaluated in isolation, leading to a disjointed understanding that masks the overall environmental and socio-economic ramifications.

The onshore components encompass cabling that traverses protected moorland, the construction of a substation in proximity to Stornoway, and the development of necessary access routes through sensitive landscapes. Notably, these activities involve excavation in areas of deep peat, especially within Barvas Moor, which serves as a critical carbon repository and an ecologically fragile environment. Without an exhaustive evaluation of these impacts, a full comprehension of the project's environmental footprint remains elusive.

Moreover, the omission or postponement of onshore impact assessments obstructs a thorough appraisal of cumulative effects. The Environmental Impact Assessment process stipulates that all facets of a project should be assessed collectively; however, the distinct treatment of offshore and onshore components results in a lack of clarity regarding the combined repercussions on peatlands, habitats, and local communities.

There are grave concerns surrounding the potential risks to sensitive habitats, including machair systems and peatland environments that are under policy protection. The application does not sufficiently demonstrate that these impacts have been thoroughly evaluated or that suitable avoidance measures have been implemented, creating a significant evidential void in relation to biodiversity safeguarding.

Additionally, the routing of infrastructure through active croft land raises possible conflicts with existing land use and legal rights. The application lacks evidence that requisite consents or processes have been pursued, bringing into question the feasibility and lawful execution of the project.

From a policy standpoint, the disjointed assessment of the project and the failure to show protection for peatlands, habitats, and land use interests contravene the principles outlined in the National Marine Plan and National Planning Framework 4. The inability to illustrate that impacts can be circumvented or mitigated further undermines the validity of the application.

Collectively, the fragmentation of project components, the absence of a thorough assessment, and the lack of supporting evidence regarding environmental and land use impacts render this segment of the application incomplete and unreliable, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which play a vital role in the area's environmental quality, cultural identity, and tourism value. The proposed project would introduce permanent red aviation lighting that is visible over long distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon. This change would fundamentally alter the night-time environment, yet the application fails to assess the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. Given the significance of dark skies to the region's identity and the emerging tourism sector of

astro-tourism, this omission is especially troubling.

Moreover, there is no evaluation of how this lighting would affect nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are highly sensitive to artificial lighting due to phototaxis, which can result in disorientation and increased collision risk. The application lacks a lighting impact assessment or a phototaxis study, failing to examine how aviation lighting might impact these species or contribute to mortality rates.

Additionally, the ornithological assessment relies on daytime survey data, which does not capture nocturnal activity or the associated risks. Other species, such as Kittiwakes, which may forage or migrate at night, are also vulnerable to disorientation caused by artificial lighting, yet this risk remains unassessed. Without site-specific night-time data, there is a critical gap in understanding the ecological impacts.

The failure to consider nocturnal impacts raises significant concerns about whether protected species or designated sites could be adversely affected. The evidential standard required to demonstrate the absence of adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and thereby obstructing a lawful determination.

From a policy standpoint, the absence of this assessment conflicts with the National Planning Framework 4 regarding the protection of natural places and the quality of the environment. Furthermore, it undermines the overall evaluation of landscape and seascape impacts, as the character of the night-time environment is an integral aspect of the ecosystem.

In summary, the lack of assessment concerning dark skies and nocturnal wildlife creates a substantial evidential gap. The absence of baseline data, impact modelling, and species-specific analysis means the application is incomplete and cannot support a lawful determination.

TOURISM

The analysis of tourism impacts is inadequate and does not assess the economic and social effects on a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, nearly untouched landscape, dark skies, and sense of seclusion. While the application states that 86% of visitors are attracted by scenery, it lacks a quantified evaluation of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of tourism.

The tourism sector has seen substantial growth, rising from £65 million in 2017 to over £81.5 million, providing support for more than 1,000 jobs and making up to 16% of the island's economy. However, the application does not examine how the industrialisation of the seascape and decline in environmental quality could impact Tourism Gross Value Added or the broader economic resilience. Without this analysis, it is impossible to ascertain whether the development would yield a net economic benefit or adversely

affect an established and expanding sector.

Furthermore, the assessment neglects the significance of environmental quality in bolstering tourism, including the value of unspoiled landscapes and dark skies for visitor experience, as well as emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment worsens this shortcoming, creating a considerable gap in understanding the effects on a recognised and growing segment of the local economy.

In an island community with limited economic diversity, the oversight regarding tourism impacts has broader ramifications for employment, local businesses, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been analysed as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, especially regarding economic impact and the necessity to show net benefit. It also contradicts strategic objectives that highlight tourism as a key growth sector, and it does not furnish adequate evidence for the competent authority to evaluate the economic repercussions of the proposal.

Overall, the shortcomings in quantifying tourism impacts, evaluating environmental factors influencing visitor behaviour, and recognising the island's economic dependency lead to a significant evidential gap. This hampers a thorough assessment of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fundamentally fails to meet the requirements of sustainable development when evaluated against statutory duties, national policy, and evidential standards. This application mirrors the central issues that resulted in the 2008 refusal of the Lewis Wind Power proposal, where the level of industrialisation was deemed unacceptable. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application falls short.

There are significant gaps in the evidential basis necessary for determination. It lacks complete baseline data, employs an undefined design envelope, relies on unspecified mitigation measures, and omits critical impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of likely significant effects or residual impacts.

Additionally, procedural shortcomings are evident. The absence of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018, while the non-disclosure of the full Social Impact Assessment represents a material omission. These issues hinder the competent

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

Moreover, the proposal contradicts the National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural places, and cultural heritage. There is insufficient evidence to confirm that health and wellbeing impacts are acceptable, and the absence of tourism impact modelling undermines claims of net economic benefit. The cumulative impacts of both offshore and onshore elements have not been appropriately assessed, leading to obscured effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainty remains regarding environmental risks, which could be significant. The assessments pertaining to marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, inconsistent. The evidential threshold required to dismiss adverse effects beyond reasonable scientific doubt has not been reached, thus invoking the precautionary principle and barring a lawful conclusion that impacts are acceptable.

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

In light of these factors, 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, evidence-based decision. Therefore, the competent authority should refuse consent on these grounds or invoke the relevant regulatory provisions to necessitate the submission of the missing information.

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

Additional Comments

Devastating that the march to industrialise the Highlands ignores everything about the Highlands that makes it special to live or holiday here without any benefit to the actual residents.
Our dark skies, our nature, our ability to view our landscapes and sea without industrial structures are wholly and completely the point of living here, allowing the mind to look to the horizon at peace.
Sticking a bunch of windfarms off the stunning coast line of Lewis is just unimaginable, Caithness is so scarred by the farms of the coast! Laying through Little Loch Broom and digging to Beauly, building more huge structures and then dominating the landscapes north east and south with huge pylons is disgusting. Find another way to service the rest of the UK with 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: 1709F9B4

Member of the public 1414

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 Environmental Impact Assessment Report lacks completeness and transparency regarding the environmental effects of the proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific turbine dimensions or configurations, creates significant uncertainty. This compromises the assessment's integrity and obscures the true environmental impacts, making it difficult for both the public and the competent authority to grasp the full extent of the effects.

The application places considerable reliance on yet-to-be-defined mitigation measures, monitoring strategies, and management plans. Consequently, consent is sought on the premise that environmental harm will be resolved later, which impedes a meaningful evaluation of their effectiveness and the assessment of residual impacts. This postponement of crucial information to post-consent stages is not procedurally acceptable and contradicts the intent of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies be clearly outlined before a decision is made.

Furthermore, there are considerable evidential deficiencies, including gaps in baseline data and methodological limitations, alongside a reliance on assumptions rather than site-specific evidence. These issues contribute to uncertainty about the scale and significance of impacts, especially where claims of negligible effects are made without substantial supporting data. The lack of adequate information hampers a clear understanding of cumulative and worst-case impacts, leading to scientific uncertainties that cannot align with statutory requirements.

As a result, the application does not meet the evidential criteria set by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not align with National Planning Framework 4, particularly its stipulations on biodiversity protection and environmental integrity, since it is unclear whether the impacts have been thoroughly assessed or if appropriate safeguards are established.

In summary, the reliance on an undefined design envelope, the absence of clear mitigation strategies, and gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings obstruct a lawful and thorough evaluation of environmental effects, leaving the competent authority unable to make an informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application lacks a structured and evidence-based assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. 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 assessment of marine ecology and protected species within the West Lewis coastal environment is significantly flawed and fails to present a complete understanding of the ecological receptors present in this sensitive and biologically active marine system. The methodologies utilised are inadequate for capturing the presence, behaviour, and habitat use of various species, resulting in a lack of reliable baseline data. Consequently, the basis for evaluating potential impacts is unsound.

Particularly concerning is the inadequate consideration of otters, which are classified as a European Protected Species. The application does not appropriately acknowledge their active use of coastal areas for foraging and movement. Without an assessment of their core foraging range and behavioural patterns, the potential effects from construction disturbances, noise, and increased activity remain insufficiently evaluated. This oversight undermines any conclusions drawn regarding the absence of significant effects on this species.

Additionally, the assessment of basking sharks is compromised due to reliance on aerial surveys, which introduce considerable detection bias, particularly under Atlantic weather conditions. This method is likely to lead to an underestimation of the sharks' presence, especially when compared to well-established land-based observations that indicate these waters are frequently used by the species. The failure to properly incorporate such data leads to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings result in conclusions about negligible or non-significant effects being based more on assumptions than on robust evidence. Furthermore, the lack of adequate baseline data obstructs a meaningful assessment of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions, which creates uncertainty about the actual risks facing marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set out by the Environmental Impact Assessment regime and National Planning Framework 4, as it has not correctly identified or assessed protected species. The level of uncertainty present prevents the exclusion of adverse effects beyond reasonable scientific doubt, invoking the precautionary principle. In light of these issues, consent cannot be lawfully granted.

Overall, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions culminates in an unreliable assessment. These deficiencies hinder a thorough evaluation of impacts on marine ecology and protected species, reinforcing the notion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally significant seabird populations, many of which are already experiencing decline. The ornithological assessment associated with the application is fundamentally flawed and exhibits considerable gaps in evidence and internal inconsistencies that detract from its conclusions. The application does not adequately demonstrate that these species will not be adversely affected, particularly given that the development is situated within key foraging areas and migratory pathways. There is a failure to robustly evaluate the implications of displacement, collision risk, or habitat loss.

A notable contradiction arises in the application, where the developer claims that there are no significant adverse effects while also presenting a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises doubts regarding the assessment's reliability and indicates that the conclusions presented lack adequate support from the underlying evidence.

Moreover, the assessment does not sufficiently prove that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not thoroughly considered, and the reliance on

modelling approaches contributes to uncertainty, especially for species like Kittiwakes and Fulmars that are in sharp decline. The methodologies employed are likely to underestimate mortality, particularly in situations where baseline data is incomplete and the behavioural responses of species are not fully understood.

The siting of turbines within a recognised migratory corridor adds another significant risk, as it effectively creates 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 impact on species that have relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with data deficiencies and limitations in modelling, means that the standard of beyond reasonable scientific doubt has not been fulfilled. This invokes the precautionary principle and precludes a lawful conclusion supporting consent.

Overall, 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 impacted puts the proposal in direct contradiction to national policy. Collectively, these issues render the assessment unreliable due to internal inconsistencies, methodological weaknesses, and insufficient evidence, ultimately contributing to the conclusion that the application does not meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity in the application is fundamentally inadequate, disregarding the West Lewis coastline as a dynamic cultural landscape where community, tradition, environment, and language are deeply interconnected. The application treats heritage as isolated, unchanging assets, failing to acknowledge their ongoing social, cultural, and spiritual significance within the community.

A major flaw is evident in the handling of culturally significant locations, particularly the cemeteries at Dalmore, Bragar, and Barvas, which serve as active sites for burial and spiritual practices. The assessment mischaracterises these spaces as static, ignoring their continued use and the implications of development on their surroundings. This oversight results in an incomplete understanding of cultural impacts and neglects their essential role in community life.

Moreover, the assessment fails to consider intangible cultural heritage elements, such as the Gaelic language, traditions, and the enduring connection between the community and its coastal environment. These factors are crucial to the area's identity yet are notably absent from the evaluation, which constitutes a significant oversight.

The cultural implications of the proposed development cannot be adequately understood without addressing these components.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking community, recognised as having distinct characteristics of an Indigenous People, has not been involved in a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the credibility of the assessment and does not align with established principles of participation regarding cultural and environmental matters.

Another critical issue is the failure to conduct a compliant Island Communities Impact Assessment, a statutory requirement outlined in the Islands (Scotland) Act 2018. The absence of this assessment means that the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community, rendering a lawful determination impossible.

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

In sum, the collective failures to assess living heritage, intangible cultural values, community rights, and statutory obligations lead to a significant evidential gap. The cultural impacts of the proposed development have not been sufficiently evaluated, resulting in an application that does not adequately address the true cultural costs involved.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of health, wellbeing, and social impacts related to the proposal is significantly lacking, with transparency essential for a lawful evaluation being absent. Although the developer commissioned a Social Impact Assessment that included focus groups involving local residents, the full report remains unpublished. This creates a critical evidential gap, limiting both public understanding and the competent authority's capacity to grasp the full extent of social risks identified by the developer's own research.

Residents are reportedly experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts stem from direct engagement and are therefore grounded in reality, not speculation. However, the failure to disclose the complete assessment restricts adequate scrutiny of these findings, thereby hampering the ability to assess their significance during the decision-making process.

Moreover, there is indication that the proposal threatens community identity and cohesion, with "cultural loss" highlighted in the developer’s findings. Despite this, such impacts have not been properly integrated into the main application or afforded the

necessary importance. The withholding of the entire Social Impact Assessment obscures the genuine human and social costs of the development.

This lack of transparency adversely affects the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly where community character and functioning are at stake. By not providing the complete dataset, the application fails to establish a full evidential basis for weighing the balance of benefits against harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. It is imperative that developments promote positive health outcomes and avert harm. Nonetheless, the evidence available points to existing adverse effects that remain inadequately disclosed. Without the full assessment, it is impossible to confirm adherence to this policy.

The procedural implications of this situation are profound. The competent authority is unable to perform a thorough socio-economic and health evaluation without access to the entire Social Impact Assessment. This represents a critical omission within the application and a failure to meet the evidential standards set by the Environmental Impact Assessment framework.

In conclusion, the failure to disclose the complete Social Impact Assessment, coupled with evidence of existing negative impacts, renders the evaluation incomplete and unreliable. This situation obstructs a lawful determination and reinforces the assertion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The application presents significant deficiencies in its assessment of seascape, landscape, and visual impacts, failing to adequately capture both the scale of change and the sensitivity of the environment. The West Lewis coastline is characterised by its open Atlantic horizon and undeveloped nature, contributing to a profound sense of remoteness. The proposed large-scale turbines, sited in close proximity to the shore, would result in an overwhelming industrial presence that fundamentally transforms this landscape, leading to permanent and irreversible changes.

Furthermore, the application does not accurately depict the extent of the visual impact resulting from the turbines. Their size and closeness would overshadow views from residential areas, historic sites, and popular coastal locations, thereby diminishing visual amenity and undermining the qualities of naturalness and remoteness that define this area. The assessment lacks an appropriate representation of this level of impact, especially considering the sensitivity of the landscape.

Concerns also arise regarding the methodology employed in selecting and presenting visual viewpoints. It appears that these viewpoints may not adequately reflect the most sensitive receptors or potential worst-case scenarios, particularly concerning key

cultural heritage sites and valued landscapes. This inadequacy raises the possibility that the visual impact has been underestimated, which calls into question the reliability of the assessment.

Another notable gap in the assessment is the neglect of the interconnected relationships between landscape, seascape, and cultural heritage. Important 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. However, the evaluation treats these heritage assets as separate entities, failing to acknowledge their interdependence and resulting in an incomplete understanding of the impacts on their setting and cultural significance.

The anticipated industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and severing their connection to the natural horizon. This represents not just a visual impact but a more extensive cultural and spatial detriment that the application has not sufficiently examined.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, which aims to protect natural environments and historic assets. The scale of transformation is at odds with the obligation to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case scenario assessment further detracts from any assertions of policy adherence.

Moreover, it is evident that the identified impacts cannot be effectively mitigated. Given the size, height, and proximity of the turbines, their presence would be overwhelmingly dominant and unavoidable. Consequently, the changes brought about by this proposal are not amenable to reduction through mitigation measures, leading to fundamental and permanent alterations in the landscape.

In summary, the assessment does not accurately portray the extent of impact, the environmental sensitivity, or the interconnectedness of landscape and heritage. These shortcomings prevent a reliable evaluation and solidify the conclusion that the proposal is incompatible with the protection of this important landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal does not adequately address construction and pollution risks, leading to an incomplete assessment of potential environmental effects. There is significant seabed preparation and installation planned in a high-energy Atlantic environment. However, the absence of fully developed Construction Environmental Management Plans or Pollution Prevention Plans raises serious concerns. Instead, the application relies on mitigation and contingency measures that would be created after consent, which makes it impossible to assess their sufficiency or effectiveness.

This issue is particularly alarming because the West Lewis coastline features clean coastal waters and important habitats that could be harmed by sediment disturbance

and contamination. Although the application notes risks such as sediment mobilisation and the possibility of chemical or oil spills, it lacks sufficient detail on how these incidents will be prevented, controlled, or monitored.

There is also ambiguity surrounding the behaviour and scale of sediment plumes that might result from seabed disturbance and cable installation. Without strong modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty encompasses potential consequences for marine species and habitats that have already been recognised as sensitive within the broader assessment.

Furthermore, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent is granted, the application hinders the evaluation of whether adequate safeguards are in place for addressing pollution events. This introduces procedural risks and hampers the competent authority's ability to assess the environmental protection measures necessary at the determination stage.

From a regulatory standpoint, postponing vital environmental safeguards goes against the requirements set by the Environmental Impact Assessment regime. Significant effects and their mitigation must be reviewed before consent is granted, and without this information, a lawful determination cannot occur. The application also does not prove adherence to policy requirements concerning environmental protection and water quality.

In conclusion, the lack of defined mitigation measures, insufficient management plans, and uncertainty about potential impacts make the assessment materially inadequate. These deficiencies obstruct a thorough evaluation of construction and pollution risks, reinforcing the notion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment of the proposed development lacks a robust evaluation of ecological and socio-economic impacts, particularly concerning fisheries and marine life. The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry. However, the application does not adequately demonstrate that these habitats and uses can be preserved without substantial disruption.

A major concern is the erroneous assumption that fishing activity can be displaced without any consequences. The application fails to provide evidence that there are alternative fishing grounds that are available, accessible, or able to support the additional pressure that displacement would create. This oversight is critical, as such displacement could lead to overfishing in other areas and potentially have broader economic repercussions for the local fishing fleet. In the absence of a clear, evidence-based assessment, the potential impacts on fisheries and the livelihoods they support remain poorly understood.

Furthermore, the proposal poses significant risks to marine species, primarily due to the underwater noise generated during construction. The use of high-energy hammer piling over extended periods is likely to disturb marine life over considerable distances, particularly affecting species such as dolphins. The anticipated disturbance to a notable portion of the local bottlenose dolphin population raises serious concerns, yet the application downplays these effects without providing adequate supporting evidence.

There exists a notable inconsistency within the application, where the necessity for licences to permit harm to European Protected Species is recognised, while the impacts are simultaneously portrayed as negligible. This contradiction calls into question the credibility of the assessment and raises serious concerns regarding adherence to the Habitats Regulations, especially in situations where harm may require legal authorisation.

Additionally, the assessment does not adequately consider the cumulative impacts stemming from various pressures, including habitat disturbance, noise, and the displacement of fishing activity. Without a thorough evaluation of these combined effects, it remains impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate compliance with National Planning Framework 4 or the National Marine Plan. It does not substantiate that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thereby impeding any conclusion regarding the proposal's sustainability.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is fundamentally incomplete, failing to recognise the full extent of impacts associated with what constitutes a single integrated project. The connection between the offshore turbines and onshore works is inherent, yet they are analysed separately, leading to a disjointed evaluation that conceals the real scale of environmental and socio-economic consequences.

Key onshore elements involve cabling that crosses protected moorland, the construction of a substation in proximity to Stornoway, and the associated infrastructure necessary for access through sensitive landscapes. These activities necessitate excavation in areas of deep peat, notably within Barvas Moor, an important carbon store and ecologically valuable habitat. The application lacks a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By omitting or postponing the evaluation of onshore impacts, the application obstructs a proper assessment of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered in unison; however, the division of offshore and onshore elements obscures the comprehensive impacts on peatlands, habitats, and local communities.

There exist significant risks to sensitive habitats, including machair systems and peatland environments, which are protected by policy. The application does not show that the impacts on these habitats have been thoroughly evaluated or that adequate avoidance measures have been implemented, resulting in a marked evidential gap concerning biodiversity protection.

Concerns are also raised regarding carbon balance. Disturbing peatland releases stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy initiatives. The application fails to adequately tackle this concern or illustrate that the overall carbon balance is advantageous.

Additionally, routing infrastructure through active croft land presents potential conflicts with existing land use and legal rights. The application does not provide proof that the requisite consents or processes have commenced, thus casting doubt on deliverability and lawful execution.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment concerning dark skies and nocturnal wildlife constitutes a significant evidential gap within the Environmental Impact Assessment. The West Lewis coastline is noted for its exceptionally dark skies, which are integral to the region's environmental quality, cultural identity, and tourism appeal. The proposed introduction of permanent red aviation lighting, which will be visible over substantial distances, is expected to create a continuous and intrusive "wall of light" across the western horizon, fundamentally altering the night-time environment.

There is a notable lack of analysis regarding the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This oversight is particularly relevant given the significance of dark skies to the area's identity and the emerging tourism sector focused on astro-tourism. The failure to

evaluate these impacts reveals a considerable gap in the comprehensive landscape and environmental assessment.

Additionally, there is no examination of the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are notably sensitive to artificial lighting, which can result in disorientation and heightened risks of collision. The application has not included any assessment related to lighting impacts or phototaxis studies, thereby neglecting to evaluate how aviation lighting may adversely affect these species or contribute to increased mortality rates.

This shortcoming is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to address nocturnal activity or associated risks. Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this potential threat has not been evaluated. The lack of site-specific night-time data creates a critical void in understanding the ecological impacts involved.

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

From a policy perspective, this omission is at odds with National Planning Framework 4, which pertains to the safeguarding of natural places and the preservation of environmental quality. It also diminishes the overall assessment of landscape and seascape impacts, given that night-time character is a vital aspect of the environment.

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

TOURISM

The Isle of Lewis relies heavily on tourism, which has evolved into a vital component of its economy, growing from £65 million in 2017 to over £81.5 million, and supporting more than 1,000 jobs while accounting for up to 16% of the local economy. However, the assessment of tourism impacts related to this application is materially deficient, as it neglects to evaluate the economic and social consequences for this key sector. The application acknowledges that 86% of visitors are attracted by the area's scenery, yet fails to provide a quantified assessment of how the introduction of large-scale offshore infrastructure might affect visitor numbers, behaviours, or the overall economic contribution of tourism.

Moreover, the assessment does not consider the crucial role that environmental quality plays in supporting tourism, particularly the significance of unspoiled landscapes and

dark skies in enhancing the visitor experience. The absence of a Dark Skies Assessment exacerbates this oversight, creating a considerable gap in understanding the impacts on burgeoning markets such as nature-based tourism and astro-tourism.

In an island community with limited economic diversification, this failure to properly 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 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 show net benefits. It conflicts with strategic objectives that identify tourism as a priority growth sector, failing to provide sufficient evidence for the competent authority to assess the economic repercussions of the proposal.

The cumulative effect of not quantifying tourism impacts, neglecting environmental drivers of visitor behaviour, and overlooking the economic dependency of the island results in a significant evidential gap. This prevents a thorough evaluation of economic effects and contributes to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development when evaluated against statutory duties, national policy, and evidential standards. It mirrors the key concerns that resulted in the 2008 rejection of the Lewis Wind Power proposal, where the extent of industrialisation was deemed unacceptable. Notably, this current application is submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and the wellbeing of communities.

The evidential foundation for the proposal is neither complete nor dependable. There are significant gaps in baseline data, an undefined design envelope is being utilised, and there is reliance on unspecified mitigation measures. Moreover, critical impact pathways, including those related to nocturnal wildlife, comprehensive onshore infrastructure, and effects on tourism, have been omitted. As a result, the Environmental Impact Assessment is inadequate, failing to provide a thorough understanding of potential significant effects or residual impacts.

Clear procedural shortcomings are evident as well. The lack of a compliant Island Communities Impact Assessment breaches statutory duties outlined in the Islands (Scotland) Act 2018. Furthermore, the failure to provide a full Social Impact Assessment constitutes a significant omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal contradicts the National Planning Framework 4 by failing to demonstrate

adequate protection of biodiversity, natural places, and cultural heritage. It does not show that the health and wellbeing impacts are acceptable, nor does it provide evidence of a net economic benefit due to the lack of tourism impact modelling. Additionally, 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.

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

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

In summary, the application is procedurally and substantively unfit for determination. The scale of deficiencies in information, alongside policy conflicts and unresolved environmental risks, obstruct a lawful and evidence-based decision. Therefore, the competent authority should refuse consent on these grounds or activate the relevant regulatory measures to obtain the missing information.

Consequently, 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: FB34D8A4

Member of the public 1415

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted under marine licensing and Environmental Impact Assessment regulations. It is informed by a thorough review of the Environmental Impact Assessment Report and related documentation, which reveals significant deficiencies in planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. The dimensions and design of the project, alongside its proximity to the shore, raise serious questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application does not present a sufficient evidential basis to support a lawful determination. Essential environmental data is absent, baseline information is scarce and inconsistent, and critical elements of the proposal remain unspecified. The flexible design framework complicates the understanding of potential significant effects, and the reliance on unconfirmed mitigation measures renders their effectiveness unassessable. Consequently, the submitted documentation does not allow for a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidential support.

There exist notable and serious policy conflicts. The proposal appears to be at odds with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health and wellbeing. It fails to establish that it can meet national obligations to safeguard biodiversity, climate priorities, and environmental integrity. These discrepancies directly affect the statutory assessments required for consent and hinder the competent authority's capacity to deem the development acceptable in policy terms.

The unprecedented scale of the project in this area, with substantial turbines placed in close proximity to the shoreline, raises significant concerns about landscape capacity, visual impact, and environmental consequences. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy violations indicates that the application is incomplete and cannot sustain a lawful determination. Under these conditions, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed, failing to deliver a comprehensive, transparent, or dependable evaluation of the environmental repercussions of the proposal. There exists considerable uncertainty due to the employment of a flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations of turbines. This lack of commitment compromises the integrity of the assessment, leaving both the public and the competent authority unable to grasp the true extent of potential environmental effects.

Key information regarding mitigation measures, monitoring strategies, and management plans remains undefined, leading to a situation where consent is sought under the premise that any environmental harm will be rectified at a later stage. Such a deferral not only obstructs a meaningful assessment of effectiveness but also contravenes the principles of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies must be clearly established prior to determination.

In addition, the application displays substantial evidential deficiencies, such as gaps in baseline data and limitations in methodology. Reliance on assumptions rather than site-specific evidence exacerbates uncertainty concerning the scale and significance of impacts. This is particularly evident when negligible or non-significant effects are concluded without adequate supporting data. The lack of sufficient information hampers a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that fails to align with statutory requirements.

Due to these shortcomings, the application does not meet the necessary evidential threshold required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation activates the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate alignment with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it is unable to show that impacts have been thoroughly evaluated or that appropriate safeguards are established.

Overall, the combination of an undefined design envelope, unspecified mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These serious deficiencies prevent a lawful and robust evaluation of environmental effects, ultimately leaving the competent authority incapable of making an informed decision based on the information submitted.

ASSESSMENT OF ALTERNATIVES

The application fails to provide a structured, evidence-based assessment of alternatives, which does not comply with the statutory requirements of the Environmental Impact Assessment regime. Instead of a thorough comparison of realistic alternatives based on their environmental effects, it offers a narrative account of the project's evolution. This method does not sufficiently demonstrate that less harmful options have been properly identified, assessed, and chosen over more

damaging solutions.

The lack of transparency in evaluating alternative offshore locations, development scales, or design configurations is evident. The developer has not shown that they have meaningfully considered positioning turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be lessened. Given the sensitivity of the West Lewis coastline and the critical role of proximity to shore in determining impact, the absence of such analysis hinders any conclusion that the proposed siting represents the least damaging option.

These shortcomings also extend to the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly investigated to avoid or reduce impacts on sensitive receptors, including culturally and spiritually significant sites such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis suggests that the application does not employ mitigation by design, instead relying on post-design measures.

Consequently, the application fails to show that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This represents a failure to adhere to the established mitigation hierarchy, preventing the competent authority from determining whether there are less harmful and more suitable alternatives. Without a comprehensive alternatives assessment, it cannot be concluded 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 environments, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission that contributes to the overall conclusion that the application has not 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, yet the assessment of marine ecology and protected species is deeply flawed. The baseline data provided is incomplete, and the methodologies used do not adequately capture the presence, behaviour, and habitat use of various species. This deficiency undermines any valid evaluation of potential impacts.

Particularly concerning is the omission of otters, a European Protected Species, which have not been properly recognised or assessed for their active use of the coastal areas for foraging and movement. The lack of consideration of their core foraging range and behaviour raises significant concerns about the potential effects of construction disturbances, noise, and increased activity. Consequently, this oversight compromises the conclusions drawn about the absence of significant effects on this species.

In addition, the assessment of basking sharks is inadequately addressed, relying on

aerial surveys that introduce considerable detection bias, especially in Atlantic conditions. Such an approach is likely to underestimate their presence, especially when compared to established land-based observations that show frequent use of these waters. This failure to incorporate relevant data results in an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings mean that the findings of negligible or non-significant effects are based more on assumptions than on solid evidence. The lack of adequate baseline data obstructs a meaningful evaluation of cumulative and indirect impacts, which includes seasonal variations and interactions within the broader ecosystem. This uncertainty clouds the true scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the criteria set by the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been properly identified or assessed. The uncertainty introduced by these deficiencies prevents the assurance that adverse effects can be excluded beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these circumstances, lawful consent cannot be granted.

Overall, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. Such deficiencies obstruct a robust evaluation of impacts on marine ecology and protected species, reinforcing the conclusion that the application lacks a sound evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application fails to meet the evidential threshold necessary to confirm no adverse effect on the integrity of protected sites. It contains significant gaps in evidence and presents internal inconsistencies that undermine its conclusions. The assessment does not adequately address the implications of displacement, collision risk, or habitat loss, particularly given the development's location within key foraging areas and migratory pathways.

Seabird populations on the west coast of the Isle of Lewis are internationally important and many are in decline. The assessment does not convincingly demonstrate that these species will remain unaffected, particularly the Kittiwakes and Fulmars, which are already in severe decline. The reliance on modelling approaches leads to uncertainty, especially where baseline data is incomplete. Furthermore, the siting of turbines in a recognised migratory corridor presents a significant risk, creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland.

A fundamental contradiction arises in the application when the developer concludes no significant adverse effects, while also making a Habitats Regulations derogation case that is only warranted when significant harm is expected. This inconsistency raises questions about the reliability of the assessment and suggests that its conclusions are not backed by adequate evidence.

From a regulatory standpoint, the shortcomings in the assessment represent a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The presence of contradictory conclusions, coupled with data gaps and modelling limitations, 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.

In summary, the assessment is unreliable due to internal inconsistencies, methodological weaknesses, and insufficient evidence. These deficiencies hinder a proper 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 current assessment of cultural heritage and community identity is deeply flawed and does not recognise the West Lewis coastline as a vibrant cultural landscape. Here, the environment, language, tradition, and community are inextricably linked. Instead of appreciating the dynamic social, cultural, and spiritual roles that heritage plays, the application reduces it to mere isolated and static assets.

A significant shortcoming is evident in the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites of burial and spiritual practice, but the assessment inaccurately categorises them as static features, neglecting their ongoing use, significance, and the potential impact of development on their surroundings. This mischaracterisation leads to a failure in evaluating the cultural effects and overlooks their importance in community life.

Moreover, the assessment neglects intangible cultural heritage elements, including the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These components are vital to the area's identity yet are completely omitted from consideration, creating a substantial gap in understanding the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity associated with characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the validity of the assessment and fails to adhere to established principles of participation in decisions that affect cultural and environmental interests.

A crucial procedural oversight is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic effects on the island community, making this omission a barrier to lawful determination.

From a policy standpoint, the identified deficiencies place the proposal at odds with National Planning Framework 4, particularly concerning the protection of historic assets and places. Ignoring both tangible and intangible heritage, along with failing to acknowledge living cultural practices, represents a clear deviation from policy requirements.

Ultimately, the lack of assessment regarding living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been adequately addressed, and the application does not furnish a solid foundation for assessing the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer has commissioned a Social Impact Assessment that included focus groups with local residents. However, the full report has not been published, creating a significant evidential gap. This omission prevents both the public and the competent authority from comprehensively understanding the social risks identified through the developer's own research.

Available summaries suggest that residents are experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts have been derived from direct engagement with the community and are not merely speculative. Nevertheless, the lack of disclosure regarding the full assessment limits scrutiny of the findings and the ability to gauge their significance in the decision-making process.

There is also evidence indicating that the proposal poses a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite this, such impacts have not been fully integrated into the main application or adequately considered. The withholding of the complete Social Impact Assessment obscures the true human and social cost of the development.

This lack of transparency undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is vital for developments of this scale, especially when community character and functioning may be affected. The failure to provide the full dataset results in an incomplete evidential basis for assessing the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Development should promote positive health outcomes and prevent harm, yet the available evidence points to existing adverse effects that have not been fully disclosed. Without access to the complete assessment, compliance with this policy remains unproven.

The procedural implications are significant, as the competent authority cannot conduct a thorough socio-economic and health evaluation without the full Social Impact

Assessment. This represents a material omission within the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, along with evidence of current adverse impacts, renders the assessment incomplete and unreliable. This situation hinders a lawful determination and reinforces the conclusion that the application lacks sufficient information to be supported.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

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

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

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

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

thorough worst-case assessment further weakens any assertion of policy adherence.

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

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

CONSTRUCTION AND POLLUTION RISKS

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

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

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

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

From a regulatory standpoint, the postponement of critical environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. It is imperative that significant effects and mitigation strategies are evaluated prior to consent; without this information, a lawful determination cannot be reached.

Additionally, the application fails to illustrate adherence to policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The application falls short in providing a thorough assessment of fisheries and marine life, leaving significant concerns regarding ecological and socio-economic impacts unaddressed. The waters off the West Lewis coast host a diverse marine ecosystem and an active fishing industry, yet the proposal fails to ensure that these vital uses and habitats can be safeguarded without considerable disruption.

One major concern is the assumption that fishing activities can be relocated without repercussions. The application lacks evidence to support the availability and accessibility of alternative fishing grounds that could withstand additional pressure. This oversight is critical, as displacement poses a risk of overfishing in other areas, which may result in broader economic implications for the local fishing fleet. Without an evidence-based evaluation, understanding the effects on fisheries and livelihoods is impossible.

The proposal also raises significant risks to marine species, particularly due to the underwater noise generated during construction. Prolonged high-energy hammer piling is anticipated to disturb marine life across extensive areas, impacting species such as dolphins. The expected disturbance to a notable proportion of the local bottlenose dolphin population is alarming, yet the application minimises the importance of these effects without adequate supporting evidence.

There is a notable inconsistency within the application; while it acknowledges the need for licences to permit harm to European Protected Species, it simultaneously describes the impacts as negligible. This contradiction questions the credibility of the assessment and suggests potential non-compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

Moreover, the assessment neglects to evaluate cumulative impacts arising from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. A thorough examination of these combined effects is necessary to determine the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not comply with National Planning Framework 4 or the National Marine Plan. It fails to demonstrate that the proposed development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, leading to the conclusion that it does not represent sustainable

development.

In summary, the lack of evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal inconsistencies render the assessment incomplete and unreliable. These shortcomings inhibit a proper evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The onshore infrastructure assessment is materially incomplete and does not account for the full extent of impacts from what constitutes a single integrated project. The offshore turbines and the onshore works are intrinsically linked, yet they are evaluated separately, which leads to a fragmented approach that obscures the true scale of environmental and socio-economic effects. The proposed onshore components involve cabling across protected moorland, the construction of a substation near Stornoway, and related access infrastructure through sensitive landscapes. Specifically, excavation in areas of deep peat, particularly within Barvas Moor, poses significant risks, as this region is a crucial carbon store and ecologically sensitive habitat. The application fails to provide a comprehensive assessment of these impacts, thus hindering a complete understanding of the project's overall environmental footprint.

By omitting or deferring the assessment of onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project be examined collectively; however, the separation of offshore and onshore elements results in an incomplete understanding of the combined impacts on peatlands, habitats, and local communities. Moreover, there are substantial risks to sensitive habitats, such as machair systems and peatland environments, which are protected under policy. The application does not prove that these habitat impacts have been fully evaluated or that adequate avoidance measures are in place, thus highlighting a clear evidential gap regarding biodiversity protection.

Concerns also arise regarding the carbon balance; the disturbance of peatland is likely to release stored carbon, potentially incurring a carbon debt that contradicts the objectives of renewable energy development. The application inadequately addresses this issue and fails to demonstrate that the overall carbon balance remains beneficial. Additionally, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights, as the application lacks evidence that the necessary consents or processes have been initiated, raising doubts about deliverability and lawful implementation.

From a policy standpoint, the failure to assess the project in its entirety and to demonstrate the protection of peatlands, habitats, and land use interests conflicts with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated significantly undermines the application. Overall, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts render this part

of the application incomplete and unreliable, which ultimately prevents a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is distinguished by its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism potential. The proposal introduces permanent red aviation lighting that will create an intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment. This significant alteration poses immediate risks that have not been adequately addressed.

Crucially, the assessment fails to evaluate the impact of this lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are especially sensitive to artificial lighting due to phototaxis, which can cause disorientation and increase collision risks. The application lacks any lighting impact assessment or phototaxis study, leading to a failure in evaluating how aviation lighting may affect these species or escalate mortality rates.

Moreover, the ornithological assessment is overly reliant on daytime survey data, neglecting the nocturnal activity and associated risks that species such as Kittiwakes face, particularly as they forage or migrate at night. This oversight creates a significant gap in understanding the ecological impacts, as site-specific night-time data has not been collected.

Without a proper evaluation of nocturnal impacts, it remains impossible to ascertain whether protected species or designated sites will be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt cannot be met, thus invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, the absence of an assessment concerning dark skies and nocturnal wildlife contradicts National Planning Framework 4, which emphasises the protection of natural spaces and environmental quality. This omission also undermines the comprehensive assessment of landscape and seascape impacts, as night-time character is an integral aspect of the environment.

Overall, the lack of any evaluation regarding dark skies and nocturnal wildlife represents a significant evidential gap. The application is incomplete and incapable of supporting a lawful determination due to the absence of baseline data, impact modelling, and species-specific analysis. Immediate action is required to address these critical omissions.

TOURISM

The application presents significant deficiencies in the assessment of tourism impacts, neglecting to evaluate the economic and social consequences for a vital sector of the

Isle of Lewis economy. Tourism relies heavily on the region's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. 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 might influence visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism has experienced notable growth, escalating from £65 million in 2017 to over £81.5 million, creating more than 1,000 jobs and accounting for up to 16% of the island's economy. However, the application does not model how the industrialisation of the seascape and the deterioration of environmental quality would impact Tourism Gross Value Added or the broader economic resilience of the area. Without this analysis, it remains unclear whether the development would yield a net economic benefit or threaten an established and growing sector.

The assessment further neglects to examine the critical role of environmental quality in tourism, specifically how unspoiled landscapes and dark skies contribute to visitor experiences and emerging markets, such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a considerable gap in understanding the impacts on a recognised and expanding part of the local economy.

In an island community characterised by limited economic diversification, the failure to assess tourism impacts has broader implications for employment, local businesses, and community sustainability. Additionally, 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 does not demonstrate compliance with the National Planning Framework 4, particularly regarding economic impact and the obligation to illustrate net benefit. It also contradicts strategic objectives that identify tourism as a priority growth sector and lacks sufficient evidence for the competent authority to assess the economic ramifications of the proposal.

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

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the criteria for sustainable development as outlined 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

Will impact nature, tourism and an eyesore across the coastline

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: 2086CC91

Member of the public 1416

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted in accordance with the marine licensing and Environmental Impact Assessment regimes. A comprehensive review of the Environmental Impact Assessment Report and associated documentation reveals significant deficiencies in planning, environmental considerations, cultural impacts, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, an area notable for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

Concerns arise primarily due to the unprecedented scale and design of the proposal, which raises questions about its compatibility with statutory requirements, national policy, and sustainable development principles. The application does not establish a sufficient evidential basis for a lawful determination. Critical environmental data is lacking, baseline information is inconsistent and limited, and several key aspects of the proposal remain undefined. The flexible design framework employed does not facilitate a clear assessment of likely significant effects, and the reliance on unspecified mitigation measures renders the evaluation of their effectiveness impossible. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, undermining claims of negligible or non-significant effects due to the absence of robust supporting evidence.

Moreover, there are evident and substantive conflicts with established policies. The proposal seems to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural landscapes, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements for the protection of biodiversity, climate interests, and environmental integrity. Such conflicts directly affect the statutory tests necessary for consent and impair the competent authority's ability to determine the proposal's acceptability in policy terms.

The proximity of large turbines to the shoreline introduces significant concerns regarding landscape capacity, visual dominance, and environmental impact. In light of the absence of adequate information, dependence on undefined mitigation strategies, evidential inadequacies, and clear policy non-compliance, it is evident that the application is incomplete and cannot support a lawful determination. Thus, the application must invoke the precautionary principle.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally inadequate and fails to deliver a comprehensive, transparent, or dependable assessment of the potential environmental consequences of the proposal. The introduction of a flexible Project Design Envelope, which lacks definitive turbine dimensions, layouts, or configurations, creates substantial uncertainty and obstructs the consistent application of a worst-case scenario. This compromises the integrity of the assessment, leaving both the public and the competent authority without a clear understanding of the true extent of environmental effects related to the proposed development.

Furthermore, the application places significant reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent based on the premise that environmental harm will be mitigated later undermines any thorough evaluation of effectiveness or assessment of residual impacts. This postponement of crucial information until post-consent stages is procedurally unacceptable and contravenes the objective of the Environmental Impact Assessment framework, which stipulates that significant effects and mitigation must be clearly established before any determination.

Additionally, there are notable evidential shortcomings, such as insufficient baseline data, methodological constraints, and a tendency to depend on assumptions instead of site-specific evidence. This yields uncertainty about the scale and significance of impacts, especially in instances where conclusions of negligible or non-significant effects are made without strong supporting data. The lack of adequate information hinders a proper understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that cannot satisfy statutory obligations.

As a result, the application does not fulfil the evidential threshold outlined in the Habitats Regulations, which is essential to exclude adverse effects beyond reasonable scientific doubt. This raises the precautionary principle, particularly concerning protected species and sensitive habitats. The proposal also fails to adhere to National Planning Framework 4, including the mandates pertaining to biodiversity protection and environmental integrity, as it cannot substantiate that impacts have been thoroughly assessed or that suitable safeguards are established.

Collectively, the dependence on an undefined design envelope, the lack of specified mitigation, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings inhibit a lawful and rigorous evaluation of environmental effects, leaving the competent authority ill-equipped to make a determination based on the information available.

MARINE ECOLOGY AND PROTECTED SPECIES

The methodologies employed in assessing marine ecology and protected species are fundamentally flawed, resulting in an unreliable understanding of the ecological receptors within the West Lewis coastal environment. This area is highly sensitive and biologically active, yet the incomplete baseline data means that the presence, behaviour, and habitat use of various species have not been adequately captured. The

implications of this are significant, as it undermines the validity of the assessment in evaluating potential impacts.

A critical oversight is evident concerning otters, a European Protected Species. The application does not properly acknowledge their active utilisation of coastal areas for foraging and movement. The omission of their core foraging range and behavioural patterns means that the assessment fails to consider the potential effects of construction disturbances, noise, and increased activity on these animals. Consequently, the conclusions drawn regarding the absence of significant effects on otters lack a solid evidential basis.

The assessment of basking sharks also suffers from notable deficiencies, particularly due to the reliance on aerial surveys which introduces significant detection bias in Atlantic conditions. This methodology is likely to lead to an underestimation of their presence, especially in light of land-based observations that indicate these waters are frequented by the species. The disregard for such pertinent data results in an incomplete baseline and undermines the reliability of the conclusions drawn.

As a result of these methodological shortcomings, the claims of negligible or non-significant effects are based on assumptions rather than robust evidence. Furthermore, the lack of adequate baseline data inhibits a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This fosters uncertainty about 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 National Planning Framework 4. The failure to properly identify and assess protected species introduces a level of uncertainty that prevents the exclusion of adverse effects beyond reasonable scientific doubt. This situation necessitates the application of the precautionary principle, thus rendering the granting of consent unlawful.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions leads to a fundamentally unreliable assessment. These deficiencies obstruct a thorough evaluation of the impacts on marine ecology and protected species, ultimately affirming that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

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

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

Furthermore, the assessment does not convincingly demonstrate that seabirds linked to protected areas, including the Lewis Peatlands and St Kilda, will remain unaffected. The critical nature of these feeding grounds is inadequately addressed, and the reliance on modelling approaches adds uncertainty, particularly for species like Kittiwakes and Fulmars that are in severe decline. The methodologies used likely underestimate mortality rates, especially given that baseline data is insufficient and behavioural responses are not fully understood.

The placement of turbines within an established migratory corridor presents an additional and considerable risk, effectively serving as a barrier along a primary flight path used by species moving between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term consequences of ongoing mortality in this corridor or the potential impacts on species that have relatively small global populations.

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

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

Additionally, the assessment overlooks the intangible aspects of cultural heritage, which encompass the Gaelic language, traditions, and the enduring relationship between the local community and the coastal environment. These components are vital to the area's identity, yet they are completely excluded from consideration, marking a considerable gap. Without addressing these elements, the true cultural impact of the proposed development remains unclear.

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

Moreover, a crucial procedural oversight is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This alone renders a lawful determination impossible.

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The full report of the Social Impact Assessment commissioned by the developer has not been published, creating a significant evidential gap. This lack of transparency means that both the public and the competent authority cannot grasp the complete scope of social risks identified through the developer's own research. Available

summaries suggest that residents are facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement with the community and are therefore based on actual experiences rather than speculation. However, without access to the full assessment, proper scrutiny of these findings is hindered, limiting the ability to evaluate their importance in the decision-making process.

Furthermore, the proposal is seen as a threat to community identity and cohesion, with the developer's own findings highlighting concerns about "cultural loss." Despite this, such impacts have not been fully considered in the main application or given adequate weight. The withholding of the complete Social Impact Assessment obscures the true human and social costs of the development.

This deficiency in transparency undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning may be at stake. By failing to provide the complete dataset, the application lacks a solid evidential basis for balancing benefits against harm.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 regarding health and wellbeing. Development is expected to promote positive health outcomes and prevent harm, yet the evidence available points to existing adverse effects that have not been fully revealed. Without the complete assessment, the application cannot prove compliance with this policy.

The procedural implications are serious. The competent authority cannot carry out a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a significant omission within the application and fails to meet the evidential requirements of the Environmental Impact Assessment regime.

Overall, the non-disclosure of the complete Social Impact Assessment, along with evidence of existing negative impacts, renders the assessment incomplete and unreliable. This situation obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual impacts related to the proposed development is fundamentally inadequate and does not reflect the true scale of change or the sensitivity of the surrounding environment. The West Lewis coastline is marked by its open Atlantic horizon and an undeveloped character that conveys a strong sense of remoteness. The close proximity of large-scale turbines to the shoreline would introduce a continuous industrial presence, fundamentally altering this character and leading to a permanent and irreversible transformation of the landscape.

This application fails to capture the extent of the visual change that would occur. The

size and location of the turbines would dominate views from residential areas, historic sites, and well-frequented coastal locations, adversely affecting visual amenity and undermining the essential qualities of naturalness and remoteness. The assessment does not effectively communicate the significance of these impacts within such a sensitive landscape.

Moreover, there are methodological issues concerning the selection and depiction of visual viewpoints. Evidence indicates that the viewpoints chosen may not adequately reflect the most sensitive receptors or worst-case scenarios, particularly regarding key cultural heritage sites and areas of high landscape value. Consequently, this raises the possibility that the visual impact has been underestimated, compromising the reliability of the assessment.

Another critical shortcoming is the lack of consideration for the interconnected relationship between landscape, seascape, and cultural heritage. 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 as isolated features neglects their interdependence and leads to an incomplete evaluation of the impacts on their settings and cultural significance.

The industrialisation of the seascape would disrupt these connections, changing how heritage assets are perceived and their relation to the natural horizon. This change signifies not only a visual impact but also a broader cultural and spatial detriment that has not been adequately addressed in the application.

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4 regarding the protection of natural areas and historic assets. The degree of change is at odds with the requirement to maintain landscape character, visual amenity, and the setting of culturally important sites. The lack of a comprehensive 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 overwhelmingly dominant and unavoidable. Therefore, the resulting change is profound and permanent, rather than something that could be reduced to an acceptable level through mitigation efforts.

Overall, the assessment fails to accurately depict the magnitude of impact, the sensitivity of the environment, and the interconnected nature of the landscape and heritage. These inadequacies prevent a trustworthy evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment regarding construction and pollution risks is fundamentally lacking and fails to deliver the necessary detail for a proper evaluation of potential environmental effects. The proposal entails significant seabed preparation and

installation work in a high-energy Atlantic environment. However, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that are to be formulated after consent is granted, which obstructs any meaningful assessment of their adequacy or effectiveness.

This dependence on unspecified future measures raises serious concerns due to the sensitivity of the receiving environment. The coastline of West Lewis is home to clean coastal waters and vital habitats that are at risk from sediment disruption and contamination. Although the application acknowledges the risks of sediment mobilisation and potential chemical or oil spills, it lacks sufficient detail on strategies for prevention, control, or monitoring of these events.

There is also ambiguity regarding the scale and behaviour of sediment plumes that may arise from seabed disturbance and cable installation. Without comprehensive modelling and explicitly 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 already recognised as sensitive in the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application hinders the assessment of whether adequate safeguards are in place to address pollution incidents. This creates procedural risks and diminishes the capacity of the competent authority to evaluate environmental protection measures at the point of decision-making.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. Significant effects and mitigation measures must be assessed before consent is granted, and without this crucial information, a lawful determination cannot be achieved. Furthermore, the application does not demonstrate compliance with policy obligations concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The proposal introduces substantial risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over an extended period is likely to disturb marine life across significant distances, with concerns specifically raised about the local bottlenose dolphin population. The application appears to downplay the severity of these effects, lacking sufficient

supporting evidence to justify this minimisation.

Furthermore, the assessment of fisheries and marine life is inadequate and does not offer a comprehensive evaluation of the ecological or socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the application fails to demonstrate how these uses and habitats can be protected or maintained without substantial disruption.

A critical issue lies in the assumption that fishing activity can be displaced without repercussions. The application does not provide evidence that alternative fishing grounds are available, accessible, or capable of accommodating additional pressure. This lack of information is troubling, as it raises the risk of overfishing in other areas and may lead to wider economic consequences for the local fishing fleet. Without a clear and evidence-based assessment, the implications for fisheries and local livelihoods cannot be properly understood.

There is also a notable inconsistency within the application. While the need for licences to permit harm to European Protected Species is acknowledged, impacts are simultaneously described as negligible. This contradiction undermines the credibility of the assessment and raises significant concerns regarding compliance with the Habitats Regulations, especially when harm is expected to a level that requires legal authorisation.

Additionally, the assessment neglects to address cumulative impacts resulting from various pressures, including habitat disturbance, noise, and the displacement of fishing activity. A comprehensive evaluation of these combined effects is crucial; otherwise, the overall impact on marine ecosystems and socio-economic conditions remains indeterminate.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal is fundamentally flawed due to its incomplete assessment of onshore infrastructure, which fails to recognise the interconnected nature of the offshore turbines and onshore works. This fragmented evaluation obscures the full extent of the environmental and socio-economic impacts associated with this single integrated project.

Critical onshore elements include the installation of cabling across protected moorland, the construction of a substation in proximity to Stornoway, and the necessary access infrastructure that traverses sensitive landscapes. These activities involve excavation in areas of deep peat, notably within Barvas Moor, an important carbon store and ecologically sensitive habitat. The lack of a thorough assessment of these impacts hinders a comprehensive understanding of the overall environmental footprint of the project.

By omitting or postponing the evaluation of onshore impacts, the application fails to facilitate an adequate assessment of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered together; however, the disaggregation of offshore and onshore elements results in an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

Furthermore, there are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are afforded policy protection. The application does not convincingly demonstrate that these habitats have been fully evaluated or that appropriate avoidance measures are in place, indicating a significant evidential gap regarding biodiversity protection.

Concerns also arise regarding carbon balance, as the disturbance of peatland may release stored carbon, leading to a potential carbon debt that contradicts the goals of renewable energy development. This issue is not adequately addressed in the application, which fails to prove that the overall carbon balance remains advantageous.

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

From a policy standpoint, the failure to assess the project comprehensively 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 summary, the separation of project components, the lack of thorough assessment, and the absence of supporting 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 proposal introduces permanent red aviation lighting that would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment. This lighting is visible over long distances and represents a

significant change to the area's visual amenity and landscape character. However, the Environmental Impact Assessment fails to evaluate the impact of this lighting, which is a material omission given the importance of dark skies to the identity of the West Lewis coastline and its emerging tourism sectors, including astro-tourism.

Furthermore, the absence of any assessment regarding nocturnal wildlife is particularly concerning. 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 cause disorientation and increase their risk of collision. Despite this, the application does not provide any lighting impact assessment or phototaxis study to evaluate how the proposed aviation lighting may affect these vulnerable species or lead to increased mortality rates.

The ornithological assessment relies solely on daytime survey data, which fails to account for nocturnal activity and the associated risks for species like Kittiwakes that may forage or migrate at night. This lack of site-specific night-time data creates a critical gap in understanding the ecological impacts of the proposal. Without a thorough assessment of these nocturnal impacts, it remains impossible to ascertain whether protected species or designated sites would be adversely affected. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt cannot be fulfilled, invoking the precautionary principle and hindering a lawful determination.

From a policy perspective, the omission of these assessments contradicts National Planning Framework 4, which relates to the protection of natural places and environmental quality. It also undermines the overall assessment of landscape and seascape impacts, as the night-time character is a vital aspect of the environment.

In summary, the absence of any evaluation of dark skies and nocturnal wildlife constitutes a significant evidential gap. The failure to provide baseline data, impact modelling, and species-specific analysis results in an incomplete application that is incapable of supporting a lawful determination.

TOURISM

The application for the proposed development presents a significant deficiency in its assessment of tourism impacts, neglecting to evaluate the economic and social consequences on a vital sector of the Isle of Lewis economy. Tourism is intrinsically linked to the region's wild coastline, nearly untouched landscapes, dark skies, and overall sense of remoteness. Although the application notes that 86% of visitors are motivated by the scenery, it fails to provide a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contributions of tourism.

Tourism in the area has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, and currently supports more than 1,000 jobs, comprising up to 16% of the island's economy. Nevertheless, the application does not explore how the

anticipated industrialisation of the seascape and a decline in environmental quality may affect Tourism Gross Value Added or broader economic resilience. This lack of analysis inhibits the ability to ascertain whether the development would yield a net economic benefit or jeopardise an established and expanding sector.

Furthermore, the application fails to adequately consider the significance of environmental quality in fostering tourism. This includes the essential role of unspoiled landscapes and dark skies in enhancing visitor experiences, as well as the rising demand for nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment only exacerbates this shortcoming, resulting in a critical gap in understanding the potential impacts on this recognised and growing segment of the local economy.

For an island community with limited economic diversification, the insufficient evaluation of tourism impacts bears broader implications for employment, local businesses, and community sustainability. The lack of a compliant Island Communities Impact Assessment means that these economic vulnerabilities remain unexamined, as mandated by the Islands (Scotland) Act 2018.

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

Collectively, these shortcomings—including the failure to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and consider the economic dependency of the island—culminate in a significant evidential gap. This gap hampers a thorough assessment of economic effects and leads to the conclusion that the application remains incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the standards of sustainable development when evaluated against statutory duties, national policy, and evidential standards. This application echoes the primary issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Now, it is presented under a more robust policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are considerable deficiencies in the evidential basis required for determination. The application is marred by critical gaps in baseline data, reliance on an undefined design envelope, unspecified mitigation measures, and a failure to address significant impact pathways, particularly concerning nocturnal wildlife, the entirety of onshore infrastructure, and effects on tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a thorough understanding of likely significant

effects or any residual impacts.

Procedural failures are also evident in the application. The lack of a compliant Island Communities Impact Assessment is a breach of statutory duty as stipulated in the Islands (Scotland) Act 2018, while the failure to provide a full Social Impact Assessment constitutes a material omission. These shortcomings inhibit the competent authority from properly evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

Furthermore, the proposal conflicts directly with National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural environments, and cultural heritage. The impacts on health and wellbeing are not shown to be acceptable, and there is no evidence of a net economic benefit due to the lack of tourism impact modelling. The assessment of cumulative impacts from offshore and onshore elements has not been adequately conducted, obscuring their effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain both uncertain and potentially significant. Assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and, in certain areas, inconsistent. The required evidential threshold to confirm that adverse effects can be excluded beyond reasonable scientific doubt has not been achieved, necessitating the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

Additionally, the proposal would result in 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 impacts on tourism signify permanent effects that cannot be mitigated to an acceptable degree.

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

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

Additional Comments

I find this shocking that this eye sore should be planned with no feedback from communities I have family on the islands and they will have no benefit from it whatsoever

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: 7872835B

Member of the public 1417

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted in accordance with the marine licensing and Environmental Impact Assessment regulations. It arises from an evaluation of the Environmental Impact Assessment Report and the associated documentation, highlighting significant deficiencies across planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west coast of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and a strong sense of cultural identity. Concerns about the scale, proximity, and design of the project question its alignment with statutory requirements, national policies, and the tenets of sustainable development.

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

Additionally, there are substantial conflicts with established policies. The proposal shows inconsistencies with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate that national obligations to protect biodiversity, climate interests, and environmental integrity will be fulfilled. These discrepancies challenge the statutory tests for consent and impede the competent authority's ability to determine the project's acceptability in policy terms.

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a comprehensive and transparent evaluation of the potential environmental consequences of the proposal. The reliance on a flexible Project Design Envelope, lacking commitment to specific turbine dimensions, layouts, or configurations, creates substantial uncertainty. This uncertainty obstructs the effective application of a worst-case scenario analysis, thereby compromising the integrity of the assessment. Consequently, the impacts outlined may not accurately represent the development that is ultimately realised, leading to a situation where both the public and the competent authority are left unaware of the true extent of the environmental effects.

A concerning aspect of the application is its heavy dependence on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Consent is being sought with the assumption that environmental harm will be managed later, which severely limits any thorough evaluation of the measures' effectiveness and assessment of residual impacts. This postponement of crucial information until after consent is granted is procedurally unacceptable and contradicts the purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation measures are clearly delineated before any decision is made.

Moreover, there are considerable evidential shortcomings, including notable gaps in baseline data, methodological limitations, and an over-reliance on assumptions instead of site-specific evidence. This leads to uncertainty regarding the magnitude and significance of impacts, especially where claims of negligible or non-significant effects are made without strong supporting data. The lack of adequate information hinders a clear understanding of cumulative and worst-case impacts, creating scientific uncertainty that fails to meet statutory requirements.

As a result of these deficiencies, the application does not satisfy the evidential threshold established 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. Additionally, the proposal does not demonstrate alignment with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, since it cannot be evidenced that impacts have been thoroughly assessed or that appropriate safeguards are in place.

Overall, the reliance on an ill-defined design envelope, the absence of specified mitigation measures, and the gaps in baseline data culminate in an Environmental Impact Assessment Report that is both unreliable and incomplete. These shortcomings impede a lawful and rigorous evaluation of environmental effects and leave the competent authority unable to make an informed decision based on the provided information.

ASSESSMENT OF ALTERNATIVES

The application fails to provide a robust assessment of alternatives, which does not 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, it merely recounts the project's evolution. This narrative approach does not adequately demonstrate that less harmful options have been identified, assessed, and chosen over more damaging solutions.

Furthermore, there is a notable lack of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Particularly concerning is the absence of evidence that the developer has seriously considered placing turbines further offshore, a decision that would likely lessen visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline and the crucial role of proximity to shore in assessing impacts, the failure to include such analysis means that the proposed siting cannot be deemed the least damaging option.

The inadequacies extend to the assessment of cable routing and landfall, where there is insufficient evidence that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors. This includes areas of cultural and spiritual significance such as Barvas Cemetery. The lack of a clear avoidance strategy and a comparative analysis suggests that mitigation through design has not been effectively implemented, resulting in a reliance on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This oversight represents a failure to adhere to the established mitigation hierarchy, which ultimately hinders the competent authority's ability to ascertain whether there are less harmful and more suitable alternatives. 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 deficiency significantly undermines adherence to National Planning Framework 4, especially regarding the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a serious omission that leads to the overall conclusion that the application has not been adequately evaluated and cannot lawfully be determined.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment suffers from significant deficiencies, leading to an incomplete understanding of ecological receptors in this biologically active marine system. The methodologies employed fail to adequately capture the presence, behaviour, and habitat use of key species, which results in a lack of a solid evidential basis for evaluating potential impacts.

A major concern is the inadequate recognition and assessment of otters, a European Protected Species, particularly their active use of coastal areas for foraging and

movement. The failure to account for their core foraging range and behaviour means that the implications of construction disturbance, noise, and increased activity have not been thoroughly examined. This raises doubts about the conclusions drawn regarding the absence of significant effects on otters.

Similarly, the assessment of basking sharks demonstrates further shortcomings, as it relies heavily on aerial surveys that are prone to detection bias under Atlantic conditions. Such an approach is likely to lead to an underestimation of their presence, especially when compared to established land-based observations indicating a frequent use of these waters. The neglect to incorporate relevant data results in an inadequate baseline and undermines the reliability of the findings.

These methodological shortcomings lead to conclusions about negligible or non-significant effects being based more on assumptions than on robust evidence. Additionally, the lack of sufficient baseline data hampers any meaningful assessment of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. This introduces uncertainty regarding the genuine scale of risk to marine species and habitats.

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

In summary, the assessment is rendered unreliable due to incomplete baseline data, flawed methodologies, and unsupported conclusions. These issues hinder a thorough evaluation of impacts on marine ecology and protected species, further contributing to the overall assertion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, presenting significant gaps in evidence and internal inconsistencies that seriously undermine its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations that are already experiencing declines. However, the application fails to convincingly demonstrate that these species will not be adversely affected. Located within key foraging areas and migratory pathways, the development does not adequately evaluate the implications of potential displacement, collision risks, or habitat loss.

A crucial contradiction arises within the application, wherein the developer asserts there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is necessary only when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions drawn lack adequate support from the underlying

evidence. Furthermore, the assessment does not sufficiently prove that seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is underrepresented, and the reliance on modelling methods introduces uncertainty, particularly for species such as Kittiwakes and Fulmars, which are already in severe decline. The methodologies employed are likely to underestimate mortality, particularly in light of incomplete baseline data and insufficient understanding of behavioural responses.

The positioning of turbines within a recognised migratory corridor presents an additional significant risk, effectively 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 in this corridor or the potential effects on species with relatively small global populations.

From a regulatory standpoint, the application does not fulfil the evidential standards required to ascertain 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 satisfied. This engages the precautionary principle, thereby precluding 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 conflict with national policy.

In summary, the assessment is unreliable due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. These shortcomings hinder a thorough evaluation of impacts and lead to the conclusion that the application does not meet the statutory requirements necessary to support its determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

A significant oversight is the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are not only places of burial but also active venues for spiritual practice. By categorising them as static features, the assessment overlooks their ongoing use, significance, and the development's potential impact on their surroundings. This mischaracterisation leads to an insufficient evaluation of cultural effects and ignores their vital role in community life.

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

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

A further procedural shortcoming is the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission is significant enough to prevent a lawful determination.

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing is significantly lacking and does not provide the transparency necessary for a lawful evaluation. The developer has commissioned a Social Impact Assessment that included focus groups with local residents, but the full report remains unpublished. This creates a serious evidential gap, making it impossible for both the public and the competent authority to grasp the full extent of the social risks highlighted by the developer's own research.

Summaries that are available suggest that residents are already experiencing significant stress, anxiety, and concern due to the scale and proximity of the proposal. These effects are based on direct engagement rather than speculation. However, the absence of the complete assessment hinders a thorough examination of these findings and restricts the ability to ascertain their importance in the decision-making process.

There is also an indication that the proposal is viewed as a direct threat to community identity and cohesion, with “cultural loss” mentioned in the developer’s own findings. Nevertheless, these impacts have not been adequately incorporated into the main application or given proper consideration. Withholding the full Social Impact Assessment clouds the actual human and social costs associated with the development.

This lack of transparency undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning may be at risk. By failing to provide the complete dataset, the application does not establish a thorough evidential foundation for weighing the benefits against the harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and minimise harm, yet existing evidence points to adverse effects that have not been fully revealed. Without the complete assessment, compliance with this policy cannot be established.

The procedural implications are substantial. The competent authority cannot carry out a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This omission represents a significant flaw within the application and a failure to satisfy the evidential criteria of the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing negative impacts, renders the assessment inadequate and unreliable. This situation obstructs a lawful determination and supports the conclusion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

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

Additionally, there is a critical deficiency in the assessment's treatment of the interconnected relationship between landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting linked by visual and spatial relationships to the Atlantic horizon. The evaluation treats these assets in isolation, disregarding their interdependence and leading to an incomplete assessment of impacts on their setting and cultural significance.

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

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

This dependence on unspecified future measures raises alarms given the delicate nature of the surrounding environment. The West Lewis coastline is home to pristine coastal waters and crucial habitats that are at risk from sediment disruption and

contamination. While the application acknowledges potential hazards, including sediment mobilisation and accidental spills of chemicals or oil, it lacks sufficient detail on how such incidents will be prevented, managed, or monitored.

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

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

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

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

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 of the project's onshore infrastructure is significantly lacking and does not take into account the full range of impacts associated with what constitutes a single integrated project. The offshore turbines and the onshore works are fundamentally interconnected; however, they are evaluated separately. This fragmented approach obscures the actual magnitude of both environmental and socio-economic effects.

The onshore components encompass cabling that crosses protected moorland, the construction of a substation in proximity to Stornoway, and necessary access infrastructure that traverses sensitive landscapes. These construction activities involve excavation in areas with deep peat, particularly within Barvas Moor, which is an

important carbon sink and ecologically delicate habitat. The application fails to deliver a thorough assessment of these impacts, which hinders a comprehensive understanding of the project's overall environmental footprint.

By omitting or postponing the evaluation of onshore impacts, the application undermines the ability to assess cumulative effects adequately. The Environmental Impact Assessment process necessitates that all parts of a project are reviewed collectively, yet the division between offshore and onshore elements means that the collective impacts on peatlands, habitats, and local communities remain unclear.

Furthermore, there are considerable risks to vulnerable habitats, such as machair systems and peatland environments, which are under policy protection. The application does not prove that impacts on these habitats have been completely assessed or that suitable avoidance measures have been implemented. This results in a significant evidential gap concerning biodiversity protection.

Concerns also arise regarding carbon balance. The disturbance of peatland leads to the release of stored carbon, which could establish a carbon debt that undermines the goals of renewable energy initiatives. The application does not sufficiently address this concern or show that the overall carbon balance is still advantageous.

Additionally, routing infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application does not provide sufficient evidence that the necessary consents or processes have been initiated, leading to doubts about both deliverability and lawful execution.

From a policy standpoint, the failure to treat the project as a cohesive whole and to demonstrate the protection of peatlands, habitats, and land use interests is at odds with the National Marine Plan and National Planning Framework 4. The lack of ability to demonstrate that impacts can be avoided or mitigated further diminishes the application's validity.

In summary, the separation of the project's components, the absence 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 proposal introduces permanent red aviation lighting that would be visible over long distances, leading to a continuous and intrusive “wall of light” effect across the western horizon. This alteration fundamentally changes the night-time environment, which is particularly concerning given the West Lewis coastline is noted for its exceptionally dark skies. These dark skies are integral to the area's environmental quality, cultural identity, and tourism value. The application fails to assess the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors, creating a significant gap in the overall landscape and environmental

assessment.

In addition, the proposal lacks an evaluation of the impacts on nocturnal wildlife, including sensitive species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel. These species are particularly vulnerable to artificial lighting due to phototaxis, leading to disorientation and increased collision risk. The absence of any lighting impact assessment or phototaxis study means that the potential effects of aviation lighting on these species, and the associated risks of increased mortality, have not been addressed.

The ornithological assessment's reliance on daytime survey data is also troubling, as it does not capture nocturnal activity or the associated risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting. The lack of site-specific night-time data presents a critical gap in understanding the ecological impacts.

Without a thorough assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would suffer adverse effects. The evidential standard required to rule out adverse effects beyond reasonable scientific doubt cannot be achieved, necessitating the precautionary principle and impeding a lawful determination.

From a policy standpoint, the omission contradicts the National Planning Framework 4 regarding the protection of natural places and environmental quality. This lack of consideration undermines the wider assessment of landscape and seascape impacts, as the character of the night-time environment is a fundamental aspect of the overall setting.

Collectively, the absence of an assessment of dark skies and nocturnal wildlife constitutes a significant evidential gap. The failure to provide baseline data, impact modelling, and species-specific analysis renders the application incomplete and incapable of supporting a lawful determination.

TOURISM

The application presents a materially deficient assessment of tourism impacts, neglecting to evaluate the economic and social consequences for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, nearly pristine landscapes, dark skies, and a profound sense of remoteness. Despite acknowledging that 86% of visitors are attracted by the scenery, there is no quantified assessment of how large-scale offshore infrastructure could influence visitor numbers, behaviour, or overall economic contributions.

The significance of tourism has risen considerably, 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. Nevertheless, the application neglects to model the potential impacts of industrialising the seascape and diminishing environmental

quality on Tourism Gross Value Added and broader economic resilience. Without this analysis, it remains unclear whether the proposed development would provide a net economic benefit or jeopardise an established and burgeoning sector.

Furthermore, the assessment fails to recognise the importance of environmental quality in fostering tourism, particularly the value of unspoiled landscapes and dark skies to visitor experiences and emerging markets such as nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this deficiency, creating a substantial gap in understanding the implications for a recognised and expanding segment of the local economy.

In an island community characterised by limited economic diversification, the lack of consideration for tourism impacts has broader ramifications for employment, local businesses, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been addressed as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not establish compliance with National Planning Framework 4, especially concerning 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 consequences of the proposal.

In summary, the collective failure to quantify tourism impacts, analyse environmental factors influencing visitor behaviour, and consider the island's economic reliance culminates in a significant evidential gap. This hinders a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the statutory duties and standards required for sustainable development. This application mirrors the principal issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it still does not provide a comprehensive or reliable evidential foundation for decision-making.

Critical gaps exist in baseline data, and the application continues to rely on an undefined design envelope. Furthermore, it leans on unspecified mitigation measures while neglecting vital impact pathways, such as those affecting nocturnal wildlife, the full extent of onshore infrastructure, and the effects on tourism. As a result, the Environmental Impact Assessment is incomplete, failing to facilitate a thorough understanding of the likely significant effects and residual impacts.

Procedural deficiencies are also evident. The lack of a compliant Island Communities Impact Assessment is a violation of statutory obligations outlined in the Islands

(Scotland) Act 2018. Additionally, the non-disclosure of the complete Social Impact Assessment is a material omission, hindering the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These shortcomings render the application unfit for determination.

Moreover, the proposal stands in direct opposition to National Planning Framework 4. It does not adequately protect biodiversity, natural places, and cultural heritage. The application fails to demonstrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, primarily due to the absence of tourism impact modelling. The cumulative impacts of offshore and onshore components have not been thoroughly evaluated, clouding the assessment of effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and may be significantly detrimental. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistently reported. The necessary evidential standard to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, thereby engaging the precautionary principle and obstructing a lawful conclusion regarding acceptable impacts.

Additionally, the proposal would bring about considerable and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruptions to cultural and visual relationships, and adverse effects on tourism indicate permanent consequences that cannot be satisfactorily mitigated.

In conclusion, the application is procedurally and substantively unfit for determination. The considerable deficiencies in information, alongside policy conflicts and unresolved environmental risks, obstruct the ability to reach a lawful and evidence-based decision. The competent authority should either refuse consent on these grounds or invoke the relevant regulatory provisions to mandate the submission of the missing information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 94E0593A

Member of the public 1418

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 based on an examination of the Environmental Impact Assessment Report and associated documentation, highlighting significant deficiencies related to planning, environmental, cultural, and procedural aspects. The development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, relatively unspoiled environment, and rich cultural identity. Concerns arise from the scale, design, and proximity of the proposal, which raise questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application does not present a sufficient evidential foundation necessary for a lawful decision. There is a notable absence of critical environmental data, while the baseline information provided is both limited and inconsistent. Moreover, key elements of the proposal remain undefined, leading to ambiguity in understanding potential significant effects. The use of a flexible design framework complicates the ability to assess these effects, and the reliance on unspecified mitigation measures renders it impossible to evaluate their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects lack robust supporting evidence.

There exist substantial conflicts with established policies. The proposal does not appear to align with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural habitats, cultural heritage, and health and well-being. It does not adequately demonstrate compliance with national obligations to protect biodiversity, climate interests, and environmental integrity. These discrepancies directly challenge the statutory tests required for obtaining consent and compromise the competent authority's ability to determine the project's acceptability in policy terms.

The unprecedented scale of the proposal, with large turbines situated in close proximity to the shoreline, raises significant issues concerning landscape capacity, visual dominance, and overall environmental impact. Collectively, the lack of sufficient information, dependence on undefined mitigation, evidential shortcomings, and clear policy violations indicate that the application is incomplete and does not support a lawful determination. In light of these circumstances, it is essential that the precautionary principle be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate and does not offer a comprehensive or dependable account of the potential environmental effects associated with the proposal. The application's reliance on a flexible Project Design Envelope, which lacks specific commitments to turbine dimensions, layouts, or configurations, introduces significant uncertainty. This ambiguity undermines the assessment's integrity and may lead to a misrepresentation of the actual impacts of the development, thereby hindering both public understanding and the competent authority's ability to gauge the true extent of the environmental consequences.

Furthermore, the application places considerable emphasis on unestablished mitigation measures, monitoring strategies, and management plans. Seeking consent under the assumption that environmental harm will be resolved later obstructs meaningful evaluation of these measures' effectiveness and the assessment of residual impacts. This deferral of crucial information to post-consent stages contravenes the intended purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies are clearly delineated before any determination is made.

Additionally, the report exhibits serious evidential shortcomings, including insufficient baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. Such deficiencies result in uncertainty regarding the scale and significance of the impacts, particularly where negligible or non-significant effects are asserted without robust supporting evidence. The lack of adequate information hampers a thorough understanding of cumulative and worst-case impacts, generating scientific uncertainty that fails to align with statutory requirements.

Consequently, the application does not satisfy the evidential threshold mandated by the Habitats Regulations, as it does not eliminate adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. The proposal also does not demonstrate adherence to National Planning Framework 4, including standards related to biodiversity protection and environmental integrity, since it cannot prove that impacts have been comprehensively assessed or that suitable safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The Environmental Impact Assessment regime requires a thorough assessment of alternatives, yet the current application falls short of this statutory obligation. Instead of offering a structured and reasoned comparison of realistic alternatives based on their environmental effects, it provides a narrative of project evolution that does not

adequately identify or assess less harmful options. This significant oversight raises concerns about the developer's consideration of alternative offshore locations, development scales, and design configurations.

Specifically, the application does not demonstrate that the possibility of situating turbines further offshore, where visual, ecological, and coastal impacts could be lessened, has been seriously considered. The sensitivity of the West Lewis coastline underscores the importance of proximity to shore in evaluating environmental impact. Consequently, the lack of such an analysis casts doubt on the assertion that the proposed siting is indeed the least damaging option available.

Furthermore, the shortcomings extend to the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been sufficiently explored to mitigate impacts on sensitive receptors. This includes areas of cultural and spiritual significance, such as Barvas Cemetery. The absence of a clear strategy for avoidance and the lack of comparative analysis suggest a failure to apply mitigation by design, resulting in an overreliance on post-design measures to address potential harm.

As a consequence, the application does not adequately demonstrate that environmental harm has been minimised through thoughtful site selection, layout, and infrastructure routing. This inadequacy represents a deviation from the established mitigation hierarchy, which prevents the competent authority from determining whether more appropriate and less harmful alternatives are available. Without a comprehensive assessment of alternatives, it is impossible to ascertain if the proposal is sustainable or compliant with relevant policies.

From a policy standpoint, these deficiencies hinder compliance with National Planning Framework 4, particularly concerning the protection of natural environments, cultural heritage, and community wellbeing. The failure to present a structured and comparative assessment is a material shortcoming that further supports the conclusion that the application has not been thoroughly evaluated and is incapable of sustaining a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species demonstrates significant deficiencies, leaving local concerns unaddressed regarding the ecological integrity of the West Lewis coastal environment. This area is known for its biological activity and sensitivity, yet the application relies on incomplete baseline data and methodologies that do not adequately reflect species presence, behaviour, and habitat utilisation. Consequently, the assessment lacks a reliable evidential basis for determining impacts.

A notable gap in the assessment pertains to otters, a European Protected Species. The failure to thoroughly recognise and evaluate their foraging and movement patterns along the coast raises critical issues. Without a proper understanding of their core

foraging range, the potential effects of construction-related disturbances such as noise and increased activity are inadequately assessed. This oversight undermines any claims regarding the lack of significant effects on otters.

The evaluation of basking sharks reveals further methodological shortcomings. The reliance on aerial surveys introduces a substantial detection bias, particularly under Atlantic conditions, likely leading to an underestimation of their presence. In contrast, established land-based observations indicate that these waters are frequently utilised by basking sharks. Ignoring or inadequately considering such data results in an incomplete baseline, further compromising the reliability of the conclusions drawn.

These methodological flaws mean that assertions of negligible or non-significant effects rest on assumptions rather than solid evidence. The lack of sufficient baseline information obstructs a meaningful assessment of cumulative and indirect impacts, including variations over seasons and broader ecosystem interactions. This situation creates uncertainty around the actual risks posed to marine species and their habitats.

From a regulatory standpoint, the application fails to align with the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it does not adequately identify or assess protected species. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, which invokes the precautionary principle. In light of these considerations, it is clear that consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application contains significant deficiencies that compromise the reliability of the ornithological assessment. The west coast of the Isle of Lewis is home to seabird populations of international importance, many of which are already experiencing declines. However, the application fails to provide the necessary evidence to demonstrate that these species will not be adversely affected. Key foraging areas and migratory pathways have been identified in the development's location, yet the assessment does not adequately evaluate the risks of displacement, collision, or habitat loss.

A troubling contradiction is evident in the developer's conclusions, which assert no significant adverse effects while simultaneously presenting a Habitats Regulations derogation case, a measure that is only necessary when significant harm is anticipated. This inconsistency raises doubts about the assessment's reliability and suggests that the conclusions drawn are not backed by the evidence provided. The assessment lacks sufficient evidence regarding the potential impacts on seabirds associated with protected sites such as the Lewis Peatlands and St Kilda. Notably, the significance of

these feeding grounds is not thoroughly considered, and the modelling methods employed introduce uncertainty, particularly for species like Kittiwakes and Fulmars that are in severe decline. The methodologies likely underestimate mortality, especially given the incomplete baseline data and the lack of understanding regarding behavioural responses.

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

Regulatory considerations indicate that 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, alongside data gaps and limitations in modelling, suggests that the standard of beyond reasonable scientific doubt has not been satisfied. This invokes the precautionary principle and hinders a lawful conclusion that could support consent. Furthermore, these identified deficiencies indicate non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally significant seabird populations will remain unaffected places the proposal in direct conflict with national policy.

In summary, the assessment is deemed unreliable due to its internal inconsistencies, methodological shortcomings, and insufficient evidence. These issues hinder a thorough evaluation of potential impacts and lead to the conclusion that the application does not satisfy the statutory requirements necessary for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is fundamentally flawed, particularly regarding the West Lewis coastline, which is a dynamic cultural landscape where environment, language, tradition, and community are deeply interconnected. This application adopts a simplistic view, treating heritage as isolated, static assets, neglecting their ongoing social, cultural, and spiritual significance within the community.

A major oversight is evident in the handling of significant cultural sites, including the cemeteries at Dalmore, Bragar, and Barvas. These locations are not merely static features; they serve as active places of burial and spiritual practice. The assessment's failure to account for their continued use and meaning, along with the potential impact of development on their setting, leads to an incomplete understanding of cultural effects and ignores their essential role in community life.

Furthermore, the evaluation neglects intangible aspects of cultural heritage such as the Gaelic language, traditions, and the enduring connection between the community and

the coastal environment. These components are vital to the area's identity yet are entirely overlooked in the assessment, representing a significant gap. Without acknowledging these elements, the true cultural impact of the development remains unclear.

Community rights and engagement also raise serious concerns. The Gaelic-speaking population has a distinct cultural identity recognised as part of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of genuine engagement undermines the legitimacy of the assessment and does not adhere to established principles of participation regarding decisions that affect cultural and environmental interests.

A further procedural flaw is the absence of a compliant Island Communities Impact Assessment, required by the Islands (Scotland) Act 2018. This omission means the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community. Such a gap alone renders a lawful determination impossible.

From a policy standpoint, these inadequacies place the proposal at odds with National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to consider both tangible and intangible heritage, along with living cultural practices, clearly deviates from policy requirements.

Overall, the deficiencies in assessing living heritage, intangible cultural value, community rights, and statutory obligations culminate in a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application fails to provide a solid foundation for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency regarding the Social Impact Assessment conducted by the developer is a critical shortcoming that affects the evaluation of the application. While the developer engaged local residents through focus groups, the full report remains unpublished, leading to a significant evidential gap. This absence hinders both public understanding and the competent authority's ability to assess the social risks identified in the developer’s own research.

Evidence suggests that residents are experiencing measurable levels of stress, anxiety, and concern linked to the scale and proximity of the proposed development. These findings are based on direct engagement and should not be viewed as speculative. However, without access to the complete assessment, the findings cannot be adequately scrutinised, and their significance in the decision-making process is diminished.

Furthermore, the proposal is perceived as a threat to community identity and cohesion, with the developer's findings highlighting concerns over “cultural loss.” These social

impacts have not been sufficiently acknowledged in the main application and have not been assigned the appropriate weight. The failure to disclose the full Social Impact Assessment obscures the true human and social costs of the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health impacts is crucial for developments of this magnitude, particularly when community character and functioning are at stake. The absence of the complete dataset leads to an incomplete evidential basis for balancing benefits against harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. It is required that developments promote positive health outcomes and avoid causing harm. However, the evidence currently available points to existing adverse effects that have not been fully disclosed. Thus, without the full assessment, compliance with this policy remains unproven.

The procedural implications of this situation are profound. The competent authority cannot perform a thorough socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This represents a material omission within the application and signifies a failure to meet the evidential standards mandated by the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment regarding seascape, landscape, and visual impacts is fundamentally flawed and does not sufficiently capture the extent of change or the sensitivity of the surrounding environment. The character of the West Lewis coastline is marked by its unobstructed Atlantic horizon, its undeveloped nature, and a profound sense of remoteness. The proposed large-scale turbines, located near the shoreline, would impose a continuous and overpowering industrial presence, which would irrevocably change this character and lead to a permanent transformation of the landscape.

Moreover, the application fails to accurately depict the extent of this visual alteration. Due to their scale and proximity, the turbines would overshadow views from residential areas, historic sites, and popular coastal locations. This would adversely affect visual amenity and compromise the essential qualities of naturalness and remoteness. The assessment does not adequately communicate the significance of this impact within the framework of such a sensitive landscape.

Concerns also arise regarding the methodology employed in selecting and presenting visual viewpoints. There is evidence that these viewpoints may not fully encompass the

most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and valued landscapes. This raises the possibility that the actual magnitude of visual impact has been minimised, which undermines the credibility of the assessment.

Additionally, the analysis neglects to consider the interconnectedness of landscape, seascape, and cultural heritage. Notable sites, including the Calanais Standing Stones and other Scheduled Monuments, are embedded within a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these sites as standalone entities, overlooking their interdependence and leading to an incomplete understanding of the impacts on their settings and cultural significance.

The industrialisation of the seascape would disrupt these connections, altering the experiences related to heritage assets and severing their ties to the natural horizon. This represents not only a visual impact but also a deeper cultural and spatial damage that has not been adequately examined in the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, which emphasises the need to protect natural places and historic assets. The scale of change proposed is at odds with the requirement to preserve landscape character, visual amenity, and the context of culturally significant sites. The lack of a thorough worst-case assessment further diminishes any assertion of compliance with policy.

It is evident that the identified impacts cannot be effectively mitigated. Given the size, height, and closeness of the turbines, their presence would be overwhelming and inescapable. Consequently, the change is fundamentally permanent, rather than something that could be diminished to an acceptable level through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The assessment of risks associated with construction and pollution is severely lacking, failing to provide the necessary detail for evaluating the likely environmental effects. The proposal includes significant seabed preparation and installation works in a high-energy Atlantic environment. However, it does not present fully developed Construction Environmental Management Plans or Pollution Prevention Plans, relying instead on mitigation and contingency measures that are to be formulated after consent is granted. This reliance on unspecified future measures is particularly troubling, given the sensitive nature of the receiving environment.

The West Lewis coastline is home to clean coastal waters and critical habitats that are at risk of sediment disturbance and contamination. Although the application

acknowledges potential risks such as sediment mobilisation and accidental chemical or oil spills, it lacks sufficient detail on how these risks will be effectively prevented, controlled, or monitored.

Moreover, there is significant uncertainty surrounding the extent and behaviour of sediment plumes resulting from seabed disturbance and cable installation. In the absence of robust modelling and clearly defined management strategies, it is impossible to ascertain the potential ecological effects or the duration of these impacts. This uncertainty raises additional concerns regarding the impact on marine species and habitats already identified as sensitive in the broader assessment.

Compounding these issues is the lack of detailed emergency response procedures. The decision to defer contingency planning to a post-consent stage obstructs the evaluation of whether adequate safeguards are in place for responding to pollution incidents. This creates procedural risks and undermines the ability of the competent authority to assess the effectiveness of environmental protection measures at the time of determination.

From a regulatory viewpoint, postponing essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. It is mandated that significant effects and mitigation measures must be evaluated before consent, and without this information, a lawful determination cannot be achieved. Furthermore, the application fails to demonstrate compliance with policy requirements regarding environmental protection and water quality.

In summary, the deficiencies stemming from the absence of defined mitigation measures, lack of detailed management plans, and the uncertainty of potential impacts lead to a materially inadequate assessment. These shortcomings impede a comprehensive evaluation of construction and pollution risks, reinforcing 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 assessment of the entire project lacks completeness, particularly regarding the integration of onshore and offshore infrastructure. The offshore turbines and onshore works, which are fundamentally connected, are evaluated separately, leading to a disjointed approach that fails to reveal the true magnitude of environmental and socio-economic impacts.

Included in the onshore components 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 undertakings necessitate excavation in areas of deep peat, especially within Barvas Moor, which serves as a vital carbon reservoir and is an ecologically sensitive habitat.

The application does not encompass a thorough evaluation of these impacts, hindering a complete understanding of the project's total environmental footprint.

By omitting or postponing the assessment of onshore impacts, the application obstructs a proper appraisal of cumulative effects. The Environmental Impact Assessment process mandates that all facets of a project be examined collectively. However, the division between offshore and onshore elements obscures the combined effects on peatlands, habitats, and local communities.

Moreover, the proposal poses notable risks to sensitive habitats such as machair systems and peatland environments, both of which are subject to policy protection. The application fails to show that the impacts on these habitats have been thoroughly evaluated or that suitable avoidance measures have been implemented, thus highlighting a significant evidential gap regarding biodiversity preservation.

Concerns also emerge regarding carbon balance due to the disturbance of peatland, which releases stored carbon and potentially results in a carbon debt, undermining the goals of renewable energy development. This issue is not sufficiently addressed within the application, nor does it prove that the overall carbon balance is beneficial.

Furthermore, the routing of infrastructure through active croft land raises possible conflicts with existing land use and legal rights. The application does not present evidence that the necessary consents or processes have been initiated, casting doubt on the deliverability and lawful execution of the project.

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

In summary, the disjunction of project components, the absence of a comprehensive assessment, and the lack of evidence concerning environmental and land use impacts render this portion of the application insufficient and unreliable, ultimately hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are a crucial aspect of the area's environmental quality, cultural identity, and tourism potential. The proposal introduces permanent red aviation lighting that would be visible over long distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon. This change would fundamentally alter the night-time environment and represents a significant concern.

Furthermore, the application does not address how this lighting would impact visual amenity, landscape character, or the experiences of residents and visitors. Given the importance of dark skies to the local identity and to emerging sectors like astro-

tourism, this oversight is considerable and creates a notable gap in the overall landscape and environmental assessment.

More importantly, there is no evaluation of the 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 can result in disorientation and increased collision risks. The lack of a lighting impact assessment or phototaxis study means the application fails to consider how aviation lighting might affect these species or contribute to increased mortality rates.

This gap is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which overlooks nocturnal activities and associated risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting; however, this vulnerability has not been examined. Without site-specific night-time data, there exists a significant deficiency in understanding the ecological impacts of the proposal.

The absence of an assessment regarding nocturnal impacts prevents the determination of whether protected species or designated sites could face adverse effects. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt cannot be satisfied, thus invoking the precautionary principle and obstructing a lawful determination.

From a policy standpoint, this omission is in conflict with the National Planning Framework 4 regarding the protection of natural places and environmental quality. It also diminishes the comprehensive assessment of landscape and seascape impacts since the night-time character is a vital element of the environment.

In summary, the failure to assess dark skies and nocturnal wildlife constitutes 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 assessment of tourism impacts is critically inadequate and neglects to consider the economic and social ramifications for a vital sector of the Isle of Lewis economy. With tourism being intrinsically linked to the area's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness, the application’s acknowledgement that 86% of visitors are attracted by scenery highlights a glaring oversight. It fails to provide a quantitative analysis of how large-scale offshore infrastructure may affect visitor numbers, behaviour, or the overall economic contribution that tourism makes to the island.

Tourism has experienced significant growth, escalating 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 island’s economy. Nevertheless, the application does not examine how the

industrialisation of the seascape and degradation of environmental quality would impact Tourism Gross Value Added or the broader economic resilience of the area. In the absence of such critical analysis, it remains uncertain whether the proposed development would yield a net economic benefit or jeopardise a well-established and expanding sector.

Furthermore, the assessment disregards the significance of environmental quality in bolstering tourism, including how unspoiled landscapes and dark skies enhance visitor experiences and appeal to emerging markets like nature-based tourism and astro-tourism. The failure to include a Dark Skies Assessment exacerbates this shortcoming, creating a notable gap in the understanding of impacts on a recognized and burgeoning aspect of the local economy.

In a context where the island community faces limited economic diversification, this neglect to assess the impacts on tourism has broader implications for employment, local businesses, and community sustainability. The lack of a proper Island Communities Impact Assessment means that these economic vulnerabilities have gone unexamined, contravening requirements set out in the Islands (Scotland) Act 2018.

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

In summary, the inability to quantify tourism impacts, evaluate environmental influences on visitor behaviour, and recognise the island's economic reliance culminates in a substantial evidential gap. This deficiency hinders a thorough assessment of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the requirements of sustainable development as outlined by statutory duties, national policy, and evidential standards. This application echoes the principal issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the scale of proposed industrialisation was deemed unacceptable. Despite being presented within a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the current application remains deficient.

There are critical gaps within the evidential basis provided for this proposal, including an incomplete assessment of baseline data and the use of an unspecified design envelope. Additionally, there is a reliance on unverified mitigation measures and the absence of essential impact assessments regarding nocturnal wildlife, the full extent of

onshore infrastructure, and effects on tourism. As a result, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of likely significant effects and any residual impacts.

Procedural shortcomings are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations as per the Islands (Scotland) Act 2018. Furthermore, the omission of a comprehensive Social Impact Assessment constitutes a substantial material gap. These inadequacies inhibit the competent authority from adequately evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal stands in direct contradiction to National Planning Framework 4. It fails to demonstrate adequate protection for biodiversity, natural places, and cultural heritage. It does not establish that health and wellbeing impacts are acceptable, nor does it provide evidence of a net economic benefit, as there is no modelling of tourism impacts. The cumulative effects of both offshore and onshore elements 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 potentially significant. Incomplete and internally inconsistent assessments regarding marine ecology, seabirds, protected species, and marine mammals fail to meet the evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle and precludes a lawful conclusion that the impacts of the proposal are acceptable.

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

Collectively, these issues render the application both procedurally and substantively unfit for determination. The magnitude of information deficiencies, alongside policy inconsistencies and unresolved environmental risks, obstructs a lawful and evidence-based decision-making process. Therefore, it is requested that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Additional Comments

These proposed turbines would be highly detrimental to human and animal health.

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: D687368A

Member of the public 1419

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the proposed Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The objection arises from a review of the Environmental Impact Assessment Report and associated documentation, revealing significant deficiencies in planning, environmental considerations, cultural impact, 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, largely untouched environment, and vibrant cultural identity. There are pressing concerns regarding the proposal's scale, proximity to the shore, and overall design, which challenge its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential foundation necessary for lawful determination. Critical environmental data is absent, with baseline information being both limited and inconsistent, and many key components of the proposal are inadequately defined. The reliance on a flexible design framework complicates the ability to ascertain significant environmental effects, and the unspecified mitigation measures hinder any meaningful assessment of their effectiveness. Consequently, the available documentation does not facilitate a comprehensive understanding of the potential environmental, cultural, or community impacts, undermining claims of negligible or non-significant effects due to a lack of robust evidence.

Moreover, the proposal presents clear and significant conflicts with established policies. It appears misaligned with the National Marine Plan, the Environmental Impact Assessment regulations, and National Planning Framework 4, particularly concerning biodiversity, cultural heritage, natural environments, and public health. The application does not convincingly demonstrate adherence to national requirements aimed at safeguarding biodiversity, addressing climate considerations, and maintaining environmental integrity. These discrepancies directly affect the statutory criteria for consent and compromise the competent authority's ability to determine whether the development is acceptable under policy guidelines.

The unprecedented scale of the proposal, characterised by large turbines positioned in close proximity to the shoreline, raises considerable issues related to landscape capacity, visual impact, and broader environmental repercussions. Collectively, the lack of comprehensive information, dependence on undefined mitigation strategies, evidential shortcomings, and significant policy non-compliance illustrate that the application is incomplete and insufficient for lawful determination. 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 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 application has not provided a structured and reasoned comparison of realistic alternatives based on environmental effects, which is a significant shortcoming. Instead, it presents a narrative account of project evolution that fails to show that less harmful options have been properly identified, assessed, and chosen over more damaging solutions. There is a lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not illustrate that the developer has seriously considered placing turbines further offshore, where the visual, ecological, and coastal impacts would likely be diminished. The sensitivity of the West Lewis coastline highlights the critical importance of proximity to shore in determining impact, and the absence of such analysis raises questions about whether the proposed siting is the least damaging option.

The deficiencies also extend to cable routing and landfall assessment, as there is inadequate evidence that alternative routes have been adequately explored to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis suggest that the design has not been mitigated by proper planning, relying instead on post-design mitigation measures.

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

From a policy standpoint, these deficiencies hinder 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 is a significant omission that leads to the overarching conclusion that the application has not been sufficiently assessed and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The application presents significant shortcomings in its assessment of marine ecology and protected species, leading to an unreliable understanding of the ecological receptors within the West Lewis coastal environment. This area is a biologically active and sensitive marine system, yet the baseline data provided is incomplete. The methodologies employed do not adequately capture the presence, behaviour, and habitat use of key species, resulting in an insufficient evidential basis for evaluating potential impacts.

A notable gap in the assessment pertains to otters, a species protected under European law. The application fails to appropriately recognise and evaluate their active usage of coastal regions for foraging and movement. By neglecting to consider the core foraging range and behavioural patterns of otters, the assessment does not adequately

address the potential impacts of construction disturbance, noise, and increased human activity. Consequently, this oversight undermines any assertions made regarding the absence of significant effects on otters.

Furthermore, the evaluation of basking sharks reveals additional deficiencies. The reliance on aerial surveys introduces substantial detection bias, particularly under Atlantic conditions, and is likely to underestimate their presence in the area. This is particularly evident when compared with established land-based observations that demonstrate frequent use of these waters. The lack of incorporation or proper consideration of such data results in an incomplete baseline, diminishing the reliability of the conclusions drawn.

These methodological flaws mean that claims of negligible or non-significant effects are grounded in assumptions rather than robust evidence. The absence of comprehensive baseline data hinders a meaningful assessment of cumulative and indirect impacts, which include seasonal variations and broader ecosystem interactions. This uncertainty raises questions about the true extent of risk to marine species and their habitats.

Regulatory compliance is also a concern, as the application fails to satisfy the requirements outlined in the Environmental Impact Assessment regime and National Planning Framework 4. The proper identification and assessment of protected species are lacking, and the uncertainty created by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus necessitating the application of the precautionary principle. Under these circumstances, granting consent cannot be justified legally.

In summary, the assessment is rendered unreliable due to incomplete baseline data, flawed methodologies, and unsupported conclusions. These issues impede a thorough evaluation of impacts on marine ecology and protected species, leading to the overarching conclusion that the application does not rest on a solid 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.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The concerns surrounding social impacts, health, and wellbeing related to the proposal are profound and merit urgent attention. A significant evidential gap exists due to the lack of transparency in the developer’s Social Impact Assessment, which remains unpublished despite having included focus groups with local residents. This omission hinders both public understanding and the competent authority's ability to evaluate the potential social risks highlighted by the developer’s own research.

Available summaries reveal that local residents are suffering from measurable stress, anxiety, and concern linked directly to the proposal’s scale and proximity. These findings stem from direct community engagement and are thus grounded in reality, yet the lack of access to the comprehensive assessment limits scrutiny and fails to inform the decision-making process adequately.

Additionally, there is a growing perception among residents that the proposal threatens community identity and cohesion, with references to “cultural loss” appearing in the

developer's findings. Alarmingly, these critical social impacts have not been incorporated into the application or given due consideration, further obscuring the true human and social costs of the development.

Such a lack of transparency disrupts the Environmental Impact Assessment process, as a complete understanding of social, economic, and health ramifications is vital for developments of this magnitude, especially when they could alter community character and functioning. Without the full dataset, the application fails to offer a comprehensive evidential basis to weigh benefits against harms.

From a policy standpoint, the application falls short of demonstrating compliance with National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and avoid harm, yet the evidence currently indicates existing adverse effects that remain undisclosed. Consequently, the absence of the full assessment prevents any demonstration of compliance with this critical policy.

The procedural implications are equally troubling. The competent authority is unable to conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This material omission highlights a significant failure to meet the evidential standards required under the Environmental Impact Assessment regime.

In conclusion, the combination of non-disclosure of the full Social Impact Assessment and the presence of existing adverse impacts leaves the assessment incomplete and unreliable. Such deficiencies obstruct a lawful determination and underscore the reality that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal involves the introduction of large-scale turbines near the West Lewis coastline, which is characterised by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. This development would create a continuous industrial presence that fundamentally alters the existing landscape, resulting in a permanent and irreversible transformation. The application fails to accurately represent the magnitude of visual change that would result from the turbines, which would dominate views from residential areas, historic sites, and popular coastal locations, thereby impacting visual amenity and eroding the qualities of naturalness and remoteness.

Additionally, there are methodological issues concerning the selection and presentation of visual viewpoints within the assessment. It appears that some viewpoints do not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This oversight introduces the risk of understating the visual impact, which ultimately undermines the reliability of the entire assessment.

Another significant shortcoming is the lack of consideration for the interconnected relationship between landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader

landscape that is visually and spatially linked to the Atlantic horizon. By treating these sites as isolated rather than recognising their interdependence, the assessment results in an incomplete evaluation of the impacts on their setting and cultural significance. The proposed industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are perceived and severing their relationship with the natural horizon. This effect represents not only a visual impact but also a broader cultural and spatial harm that the application fails to adequately assess.

From a policy standpoint, the proposal conflicts with National Planning Framework 4, particularly regarding the protection of natural places and historic assets. The scale of change is at odds with the obligation to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further detracts from any claims of policy compliance.

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

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to both a diverse marine ecosystem and an active fishing industry. However, the application lacks a thorough assessment of how these vital uses and habitats can be preserved without significant disruption. One major concern is the assumption that fishing activities can be relocated without negative effects. The application does not provide evidence that alternative fishing grounds exist or can handle the additional pressure, which poses a serious risk of overfishing in other areas and could have wider economic repercussions for local fishermen.

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

Furthermore, the application acknowledges the necessity for licences to allow harm to European Protected Species, while simultaneously downplaying the potential impacts as negligible. This contradiction raises doubts about the assessment's reliability and compliance with the Habitats Regulations, especially where harm is expected to require legal authorisation. The assessment also neglects to address cumulative

impacts from various pressures such as habitat disturbance, noise, and fishing displacement. Without a thorough evaluation of these combined effects, it is impossible to accurately gauge the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate alignment with the National Planning Framework 4 or the National Marine Plan. It does not establish that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, making it difficult to conclude that the proposal aligns with sustainable development principles. Collectively, the lack of evidence regarding fishing displacement, the underestimation of noise impacts, and the internal inconsistencies render the assessment insufficient and untrustworthy. These issues hinder any reliable evaluation of the potential effects on marine life and fisheries.

DARK SKIES AND NOCTURNAL WILDLIFE

The omission of an assessment of dark skies and nocturnal wildlife in the Environmental Impact Assessment represents a significant gap in the application. The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism, particularly with the rise of astro-tourism. The proposal introduces permanent red aviation lighting that is visible over long distances, creating an intrusive "wall of light" effect across the western horizon, thereby fundamentally changing the night-time environment.

Furthermore, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This oversight is particularly concerning given the critical role dark skies play in the area’s identity. The lack of consideration for these impacts results in a significant deficiency in the overall assessment of landscape and environmental factors.

More alarmingly, there has been no evaluation of how these lighting changes might 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 lead to disorientation and an increased risk of collision. The application does not include any assessment of lighting impacts or a study on phototaxis, thus failing to consider the potential adverse effects of aviation lighting on these species and the increased risk of mortality they face.

This issue is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not account for nocturnal activities or associated risks. Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this risk remains unassessed. The absence of site-specific night-time data creates a critical gap in understanding the ecological impacts.

In the absence of an assessment of nocturnal impacts, it remains impossible to ascertain whether protected species or designated sites may be adversely affected.

The necessary evidential standard to exclude adverse effects beyond reasonable scientific doubt is not met, thereby engaging the precautionary principle and hindering a lawful determination.

From a policy perspective, the omission contradicts the National Planning Framework 4 concerning the protection of natural places and environmental quality. It also undermines a broader understanding of landscape and seascape impacts, as the character of night-time environments is integral to the overall context.

In conclusion, the lack of any assessment regarding 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 economic and social consequences of the proposed development for tourism on the Isle of Lewis are inadequately addressed, particularly given that tourism is a crucial sector of the local economy. The region's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness are vital for attracting visitors. While the application notes that 86% of visitors come for the scenery, it fails to provide a quantified analysis of how large-scale offshore infrastructure may influence visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism in the area has witnessed substantial growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and constitutes up to 16% of the island's economy. However, the application neglects to model how the proposed industrialisation of the seascape and the potential loss of environmental quality would affect Tourism Gross Value Added or the wider economic resilience of the community. This lack of analysis leaves uncertainty regarding whether the development would yield a net economic benefit or detract from a vital and expanding sector.

Furthermore, the assessment does not take into account the significance of environmental quality in enhancing tourism, particularly the necessity of unspoiled landscapes and dark skies for visitor experiences and emerging markets such as nature-based tourism and astro-tourism. The omission of a Dark Skies Assessment exacerbates this shortcoming, resulting in a significant gap in understanding the implications for a recognised and growing segment of the local economy.

In an island community that lacks economic diversification, the failure to evaluate tourism impacts carries broader implications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been adequately considered, contravening the requirements set forth in the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not sufficiently demonstrate compliance with National Planning Framework 4, especially concerning economic

impact and the obligation to show net benefit. It contradicts strategic objectives that highlight tourism as a priority growth sector and fails to provide the necessary evidence for the competent authority to assess the economic implications of the proposal.

In conclusion, the collective failure to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and acknowledge the island's economic dependency culminates in a significant evidential gap. This shortfall hinders a comprehensive evaluation of economic effects and underlines the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed and does not meet the requirements of sustainable development as outlined in statutory duties and national policy. It mirrors the core issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Now, under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the proposal still fails to address these concerns adequately.

There are significant gaps in the evidential basis for the proposal. It does not include comprehensive baseline data and continues to utilise an undefined design envelope. Furthermore, it relies on unspecified mitigation measures and omits critical impact pathways, such as those related to nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, limiting the understanding of likely significant effects and residual impacts.

Procedural issues also mar the application. The lack of a compliant Island Communities Impact Assessment violates the Islands (Scotland) Act 2018, while the failure to provide a complete Social Impact Assessment represents a material omission. These shortcomings hinder the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal conflicts with the National Planning Framework 4 as it does not adequately protect biodiversity, natural places, and cultural heritage. It fails to establish that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, as tourism impact modelling has not been conducted. The assessment of the cumulative impact from both offshore and onshore elements is inadequate, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal are uncertain and potentially significant. Evaluations of marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in parts. The evidential threshold required to demonstrate the absence of adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful

conclusion regarding acceptable impacts.

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

In summary, the application is procedurally and substantively unfit for determination. The extensive information deficiencies, combined with conflicts with policy and unresolved environmental risks, inhibit a lawful, evidence-based decision. The competent authority should refuse consent for the Spiorad na Mara Offshore Wind Farm application in its entirety.

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: 7A607648

Member of the public 1420

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. A thorough review of the Environmental Impact Assessment Report and accompanying documentation has identified significant deficiencies in planning, environmental, cultural, and procedural aspects of the proposal. 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. The scale, proximity, and design of the proposed development raise serious concerns about its compatibility with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for a lawful decision. Essential environmental data is absent, baseline information is both limited and inconsistent, and several key elements of the proposal are not clearly defined. The employment of a flexible design framework obscures the understanding of likely significant effects, while the reliance on unspecified mitigation measures renders their effectiveness unassessable. Consequently, the provided documentation fails to facilitate a comprehensive understanding of the environmental, cultural, or community impacts, and the claims of negligible or non-significant effects are unsupported by robust evidence.

There are substantial conflicts with existing policies. The proposal seems at odds with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national obligations 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 determine whether the development is acceptable from a policy standpoint.

The unprecedented scale of the proposed development in this area raises considerable concerns, particularly regarding landscape capacity, visual dominance, and environmental impact, due to the large turbines being positioned close to the shoreline. In light of the insufficient information, reliance on undefined mitigation measures, evidential shortcomings, and clear policy non-compliance, it is evident that the application is incomplete and unable to support a lawful determination. Under these circumstances, the precautionary principle must be applied.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposed development introduces permanent red aviation lighting that would create a continuous and intrusive "wall of light" effect visible over long distances across the western horizon. This change fundamentally alters the night-time environment of the West Lewis coastline, which is characterised by exceptionally dark skies. The absence of an assessment of dark skies and nocturnal wildlife within the Environmental Impact Assessment is a significant oversight, as these dark skies are crucial for the area's environmental quality, cultural identity, and tourism value, particularly for emerging sectors such as astro-tourism.

Furthermore, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of residents and visitors. This gap in the assessment is critical considering the importance of dark skies to the area's identity. Additionally, there is no consideration of how the proposed lighting may affect nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can lead to disorientation and an increased risk of collision. The lack of a lighting impact assessment or phototaxis study means that the potential effects of aviation lighting on these species and their mortality rates are not addressed.

The reliance on daytime survey data in the ornithological assessment further compounds this issue, as it fails to capture nocturnal activity and associated risks. Kittiwakes, for example, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this risk has not been evaluated. The absence of site-specific night-time data creates a critical gap in understanding the ecological impacts of the proposal.

Without an assessment of nocturnal impacts, it is impossible to 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, thus engaging the precautionary principle and preventing a lawful determination of the application.

From a policy standpoint, the omission contravenes the National Planning Framework 4, which emphasises the protection of natural places and environmental quality. This oversight undermines the overall assessment of landscape and seascape impacts, as the character of the night-time environment is an integral aspect of the surrounding area.

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

TOURISM

The application acknowledges that 86% of visitors are drawn to the Isle of Lewis by its scenery. However, it lacks a quantified assessment of how large-scale offshore

infrastructure might affect visitor numbers, behaviour, or the overall economic contribution of tourism. This is particularly concerning given the significant growth in the tourism sector, which has increased 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 failure to model the potential impacts of industrialisation on the seascape and environmental quality raises serious questions about the net economic benefit of the development and its implications for a vital and growing sector.

Moreover, the assessment neglects the critical role of environmental quality in sustaining tourism. Unspoiled landscapes and dark skies are fundamental to visitor experiences, as well as emerging markets like nature-based tourism and astro-tourism. The omission of a Dark Skies Assessment exacerbates this issue, creating a notable gap in understanding the potential impacts on a significant and developing part of the local economy.

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

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

Collectively, the failure to quantify tourism impacts, assess environmental influences on visitor behaviour, and recognise the island's economic reliance results in a significant evidential gap. This prevents a thorough evaluation of economic effects and supports the conclusion that the application remains incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm reflects a significant failure to meet the requirements for sustainable development as dictated by statutory duties, national policy, and evidential standards. It echoes the fundamental issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. Despite now being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application falls short in several key areas.

There are serious deficiencies in the evidence provided for assessment. The proposal lacks a comprehensive and reliable evidential basis, with critical gaps in baseline data and the use of an undefined design envelope. It relies on unspecified mitigation

measures and neglects to address important impact pathways, including those affecting nocturnal wildlife, the full scope of onshore infrastructure, and tourism consequences. As a result, the Environmental Impact Assessment is incomplete, failing to provide a clear understanding of the likely significant effects or any residual impacts.

Moreover, there are notable procedural shortcomings. The omission of a compliant Island Communities Impact Assessment contravenes statutory obligations under the Islands (Scotland) Act 2018, and the failure to present a complete Social Impact Assessment represents a significant oversight. These inadequacies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for consideration.

Additionally, the proposal contradicts National Planning Framework 4 by failing to protect biodiversity, natural places, and cultural heritage. It does not adequately demonstrate that health and wellbeing impacts are acceptable nor provide evidence of a net economic benefit due to the lack of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been thoroughly assessed, obscuring their impact 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 at times internally inconsistent. The evidential standard needed to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and obstructing any lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, along with conflicts with policy and unresolved environmental risks, obstruct a lawful and evidence-based decision. Therefore, it is imperative that the competent authority either denies consent based on these grounds or exercises the appropriate regulatory measures to require the submission of the necessary missing information. It is requested that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 289847D5

Member of the public 1421

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. A review of the Environmental Impact Assessment Report and its supporting documents has revealed significant deficiencies in planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and strong cultural heritage. The design, scale, and proximity of the proposal raise serious questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential foundation for a lawful decision. There are critical gaps in environmental data, with baseline information being both limited and inconsistent. Additionally, many essential elements of the proposal remain undefined. The adoption of a flexible design framework hampers a clear assessment of likely significant impacts, while the reliance on unspecified mitigation measures makes it impossible to evaluate their effectiveness. Consequently, the provided documentation fails to offer a comprehensive understanding of the environmental, cultural, or community impacts, and claims regarding negligible or non-significant effects lack robust evidential support.

There are also evident and significant policy contradictions. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regulations, or National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not establish that it can meet national obligations to safeguard biodiversity, climate concerns, and environmental integrity. These discrepancies directly relate to the statutory requirements for consent and compromise the capability of the competent authority to determine the development's acceptability from a policy standpoint.

The unprecedented scale of this proposal involves large turbines located in close proximity to the shoreline, raising substantial concerns regarding landscape capacity, visual dominance, and environmental repercussions. Collectively, the lack of adequate information, dependence on undefined mitigation strategies, evidential weaknesses, and clear non-compliance with policies indicate that the application is incomplete and incapable of supporting a lawful determination. In light of these factors, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is unreliable and incomplete. It does not provide a full or transparent account of the likely environmental effects of the proposal. The application relies on a flexible Project Design Envelope, which does not commit to specific turbine dimensions or layouts. This introduces significant uncertainty and prevents a consistent worst-case scenario application. As a result, the impacts presented may not accurately reflect the development that is ultimately constructed. This lack of clarity stops both the public and the competent authority from understanding the true extent of environmental effects.

Moreover, the application depends heavily on mitigation measures, monitoring strategies, and management plans that are yet to be defined. Seeking consent on the basis that environmental harm will be addressed at a later stage makes it impossible to meaningfully evaluate effectiveness or assess residual impacts. This deferral of key information to post-consent stages is procedurally unacceptable and contradicts the purpose of the Environmental Impact Assessment regime, which demands that significant effects and mitigation are established before determination.

There are also serious evidential deficiencies, such as gaps in baseline data, limitations in methodology, and a reliance on assumptions instead of site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are made without robust supporting data. The lack of sufficient information hinders a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot be reconciled with statutory requirements.

Consequently, the application does not meet the evidential threshold required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This raises concerns about the precautionary principle, particularly concerning protected species and sensitive habitats. The proposal fails to demonstrate compliance with National Planning Framework 4, including requirements for biodiversity protection and environmental integrity, as it cannot be shown that impacts have been fully assessed or that appropriate safeguards are in place.

Overall, the reliance on an undefined design envelope, absence of specified mitigation, and gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies prevent a lawful and robust assessment of environmental effects, meaning the competent authority is not able to determine the application based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application's assessment of alternatives is fundamentally lacking and does not satisfy the statutory requirements set forth by the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives in terms of their environmental impacts, the documentation provides a narrative on the project's evolution. This method does not adequately demonstrate that less harmful options have been properly identified, assessed, and selected over more

damaging alternatives.

There is no transparent or evidence-based evaluation of alternative offshore locations, development scales, or design configurations. Notably, the application fails to show that the developer has seriously explored the possibility of placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be mitigated. Considering the sensitivity of the West Lewis coastline and the significant role that proximity to shore plays in assessing impact, the lack of such an analysis precludes any determination that the proposed siting is the least damaging option.

These shortcomings also extend to the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly examined to avoid or lessen impacts on sensitive receptors, including areas of cultural and spiritual significance, such as Barvas Cemetery. The absence of a clear strategy for avoidance and the lack of comparative analysis reveal that mitigation by design has not been implemented, with reliance 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 signifies a failure to adhere to the established mitigation hierarchy and hinders the competent authority's ability to ascertain whether less harmful and more suitable alternatives exist. In the absence of a comprehensive alternatives assessment, it cannot be concluded that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this inadequacy compromises adherence to National Planning Framework 4, particularly regarding the protection of natural places, cultural heritage, and community wellbeing. The failure to conduct a structured and comparative assessment is a significant omission that contributes to the overall conclusion that the application has not been sufficiently evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally inadequate and fails to provide a complete or trustworthy understanding of the ecological receptors present within the West Lewis coastal environment. This area is characterised by high sensitivity and biological activity; however, the baseline data is insufficient, and the methodologies used do not adequately capture the presence, behaviour, and habitat utilisation of various species. Consequently, the assessment lacks a solid evidential foundation for evaluating potential impacts.

One significant shortcoming is the treatment of otters, a species protected under European law. The application does not adequately recognise or assess the active utilisation of coastal areas by otters for foraging and movement. The oversight regarding their core foraging range and behavioural patterns leads to an inadequate evaluation of the potential impacts of construction disturbance, noise, and increased activity. This oversight undermines any assertions regarding the absence of significant effects on this

species.

Additional concerns arise concerning the assessment of basking sharks, where the reliance on aerial surveys introduces considerable detection bias, particularly under Atlantic conditions. This method is likely to result in an underestimation of the species' presence, especially when compared to established land-based observations that indicate regular use 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 reached.

The limitations in methodology mean that assertions of negligible or non-significant effects are grounded in assumptions rather than in robust evidence. The lack of sufficient baseline data further complicates the meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty regarding the actual level of risk to marine species and their habitats.

From a regulatory standpoint, the application does not conform to the stipulations of the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been properly identified or evaluated. The introduction of uncertainty prevents the dismissal of adverse effects beyond a reasonable scientific doubt, thereby invoking the precautionary principle. In light of these circumstances, lawful consent cannot be granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These deficiencies hinder a thorough evaluation of impacts on marine ecology and protected species, ultimately contributing to the conclusion that the application does not possess a sufficient evidential basis.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual, seascape, and landscape impacts presents significant deficiencies that do not adequately capture the extent of change or the sensitivity of the environment. The coastline of West Lewis, characterised by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness, would face a profound transformation with the introduction of large-scale turbines in close proximity to the shore. This would create a continuous industrial presence that fundamentally alters the area's character, leading to a permanent and irreversible landscape change.

The application fails to accurately depict the visual magnitude of this change. Given their scale and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This would detrimentally affect visual amenity and diminish the defining qualities of naturalness and remoteness, while the assessment does not sufficiently articulate the significance of these impacts in the context of such a delicate landscape.

Concerns also arise regarding the methodology employed in selecting and presenting visual viewpoints. It appears that certain viewpoints do not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This oversight risks understating the visual impact magnitude, which undermines the assessment's reliability.

Another notable shortcoming is the lack of consideration for the interconnectedness of landscape, seascape, and cultural heritage. Prominent sites like the Calanais Standing Stones and other Scheduled Monuments are integrated within a broader landscape setting linked visually and spatially to the Atlantic horizon. The assessment treats these assets in isolation, failing to acknowledge their interdependence and thus providing an incomplete analysis of impacts on their settings and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are perceived and their connection to the natural horizon. This presents not only a visual impact but also a wider cultural and spatial detriment that the application does not adequately assess.

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4 regarding the safeguarding of natural places and historic assets. The extent of change is 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 assertions of policy compliance.

Moreover, it is evident that the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would result in a dominant and unavoidable presence. Consequently, the changes brought about are fundamental and permanent, rather than reducible to an acceptable level through mitigation efforts.

In summary, the assessment does not accurately convey the extent of impact, the sensitivity of the environment, or the interconnected nature of landscape and heritage. These shortcomings hinder a dependable evaluation and reinforce the conclusion that the proposal is not compatible 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 assessment of fisheries and marine life associated with this application is inadequate and does not provide a thorough evaluation of the ecological or socio-economic impacts involved. The waters off the West Lewis coast not only host a diverse marine ecosystem but also support an active fishing industry. However, the application fails to prove that these vital uses and habitats can be protected or maintained without significant disruption.

A major concern arises from the assumption that fishing activity can be displaced without any adverse consequences. There is no evidence provided that alternative fishing grounds exist, are accessible, or can sustain additional pressure. This is a significant oversight, as such displacement could lead to overfishing in other areas and potentially harm the local fishing fleet’s economic viability. Without a sound and evidence-based assessment, the potential impacts on fisheries and livelihoods remain poorly understood.

Moreover, the proposal poses considerable risks to marine species, primarily due to the

underwater noise produced during construction. The prolonged use of high-energy hammer piling is likely to cause disturbances over large distances, affecting species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is alarming, yet the application tends to downplay the seriousness of these effects, lacking sufficient supporting evidence.

There is also a glaring inconsistency within the application itself; it acknowledges the necessity for licences to permit harm to European Protected Species while simultaneously describing impacts as negligible. This contradiction calls into question the reliability of the assessment and raises concerns about adherence to the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

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

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4 or the National Marine Plan. It fails to indicate 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 conclusion, the absence of evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal contradictions collectively render the assessment incomplete and unreliable. These shortcomings obstruct a robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment concerning onshore infrastructure is significantly lacking, failing to account for the full range of impacts associated with what constitutes a single integrated project. The offshore turbines and the onshore works are inherently connected; however, they are being evaluated separately. This fragmented approach obscures the true scale of both environmental and socio-economic consequences.

The onshore elements involve the installation of cabling across protected moorland, the construction of a substation in proximity to Stornoway, and the development of associated access infrastructure through delicate landscapes. These activities necessitate excavation in areas of deep peat, notably within Barvas Moor, an important carbon store and ecologically sensitive area. The application does not deliver a thorough assessment of these impacts, which prevents a comprehensive understanding of the project's overall environmental footprint.

By choosing to exclude or postpone the evaluation of onshore impacts, the application undermines the ability to adequately assess cumulative effects. The Environmental

Impact Assessment process stipulates that all components of a project must be considered collectively. Nonetheless, the division between offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities remain insufficiently understood.

Additionally, there are substantial risks posed to sensitive habitats, including machair systems and peatland environments, which are protected by policy. The application fails to prove that the impacts on these habitats have been thoroughly evaluated or that suitable avoidance measures have been implemented, thus creating a significant evidential gap regarding biodiversity protection.

Concerns also arise about carbon balance. The disruption of peatland is likely to release stored carbon, potentially resulting in a carbon debt that contradicts the goals of renewable energy development. The application does not sufficiently address this matter or establish that the overall carbon balance is beneficial.

Furthermore, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is no evidence presented that necessary consents or processes have been started, which raises doubts about the feasibility and lawful implementation of the proposal.

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 stands in conflict with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated significantly undermines the application.

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 segment of the application incomplete and untrustworthy, thereby impeding 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 shaping the area's cultural identity, environmental quality, and tourism potential. The proposed development would introduce permanent red aviation lighting that is visible over long distances, creating an intrusive and continuous "wall of light" effect across the western horizon. This alteration would significantly disrupt the night-time environment, yet the application fails to assess the implications of such lighting on visual amenity, landscape character, or the experiences of local residents and visitors.

The absence of an evaluation of impacts on nocturnal wildlife is particularly concerning. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are notably sensitive to artificial lighting, which can cause disorientation and increase the risk of collision. The proposal does not include a lighting impact assessment or a study on phototaxis, neglecting to consider how the introduction of

aviation lighting may affect these vulnerable species or lead to increased mortality.

Compounding this issue is the reliance on daytime survey data in the ornithological assessment, which fails to capture the nocturnal activities and associated risks faced by species such as Kittiwakes, known to forage or migrate at night. This lack of site-specific night-time data presents a critical gap in understanding the ecological impacts of the proposal.

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

From a policy standpoint, these omissions contradict National Planning Framework 4, which emphasises the importance of protecting natural places and maintaining environmental quality. Additionally, they undermine a comprehensive evaluation of landscape and seascape impacts, as the character of night-time environments is an essential component of the overall ecology.

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

TOURISM

The assessment of tourism impacts is notably inadequate, lacking a thorough evaluation of the economic and social effects on a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and overall sense of remoteness. Although the application acknowledges that 86% of visitors are attracted by the scenery, it does not provide any quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the total economic contribution.

Significant growth in tourism has been observed, with revenue rising from £65 million in 2017 to over £81.5 million, facilitating more than 1,000 jobs and representing up to 16% of the island's economy. Nonetheless, the application neglects to model the potential impacts of seascape industrialisation and the degradation of environmental quality on Tourism Gross Value Added and broader economic resilience. Without this crucial analysis, it remains unclear whether the development would yield a net economic benefit or adversely affect a well-established and expanding sector.

Furthermore, the assessment does not acknowledge the critical role that environmental quality plays in tourism, such as the significance of unspoiled landscapes and dark skies for enhancing visitor experiences and catering to emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies

Assessment exacerbates this shortcoming, creating a notable gap in understanding the potential impacts on a recognised and growing segment of the local economy.

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

From a policy perspective, the application does not demonstrate compliance with the National Planning Framework 4, particularly concerning economic impact and the necessity of proving net benefit. Additionally, it contradicts strategic objectives that recognise tourism as a priority growth sector and fails to provide adequate evidence for the competent authority to assess the economic repercussions of the proposal.

In summary, the lack of quantification of tourism impacts, failure to evaluate environmental factors influencing visitor behaviour, and disregard for the economic dependency of the island culminate in a significant evidential gap. This hinders a comprehensive assessment of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the requirements of sustainable development as outlined by statutory duties, national policy, and evidential standards. This application 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. It is now submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it still falls short.

The application lacks a complete and reliable evidential basis for determination. Significant gaps exist in the baseline data, and the use of an undefined design envelope raises concerns. Mitigation measures are not specified, and key impact pathways such as those related to nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects have been omitted. Consequently, the Environmental Impact Assessment is incomplete and does not provide a clear understanding of the likely significant effects or residual impacts.

There are also evident procedural failures in the application process. The absence of a compliant Island Communities Impact Assessment breaches statutory duties under the Islands (Scotland) Act 2018. Additionally, the failure to disclose the complete Social Impact Assessment constitutes a material omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

This proposal conflicts directly with the National Planning Framework 4. It does not

demonstrate adequate protection for biodiversity, natural environments, and cultural heritage. It fails to confirm that health and wellbeing impacts are acceptable and cannot provide evidence of a net economic benefit, particularly due to the lack of tourism impact modelling. The cumulative impacts of both offshore and onshore components have not been appropriately assessed, obscuring effects on peatlands, carbon balance, habitats, and crofting land.

The environmental risks associated with this proposal remain uncertain and potentially significant. Assessments of marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt has not been met, invoking the precautionary principle and precluding a lawful conclusion that impacts are acceptable.

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

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

Therefore, a formal request is made 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: B104E2CB